



INNER WEST COUNCIL

Council Ref: DWS4000724
Contact: Roger Rankin
Phone: 9367 9174
Date: 14 October 2016

Michael File
FPD Pty Ltd
PO Box H219
Australia Square NSW 1215

Email: Michael@fileplanning.com

Dear Michael,

RE: 469 - 483 Balmain Road, Lilyfield - Pre Planning Proposal

Thank you for submitting the above Pre Planning Proposal and supporting documents.

Without prejudicing a detailed assessment of the Roberts Day urban design for the proposed mixed use development appears to be of a high calibre. Council must however consider two core questions in deciding whether to support the Planning Proposal. These questions are:

- Of all the existing industrial sites in the former Leichhardt Local Environmental Plan (LEP) 2013 area is this one more suitable for rezoning to mixed use than the others?
- If it is in principle the most suitable industrial site for rezoning should it be rezoned with a resultant loss of industrial land if there is sufficient capacity on identified alternative mixed use and residential prospective sites to accommodate projected household growth in the area?

In order to avoid unnecessary work for the proponent's consultancy team and Council's strategic planners we need to be able to answer these two questions before we decide whether to assess the urban design and architecture of the proposed built form in detail.

The FPD Planning Proposal - Pre Lodgement Draft and the HillPDA Economic Impact Assessment address the above two questions in some detail, but do not provide all the information and analysis Council needs to consider these questions fully. Consequently I have listed the additional information Council requires from you in the latter part of this letter.

Customer Service Centres

Ashfield | P (02) 9716 1800 | E info@ashfield.nsw.gov.au | 260 Liverpool Road, Ashfield NSW 2131
Leichhardt | P (02) 9367 9222 | E leichhardt@lmc.nsw.gov.au | 7-15 Wetherill Street, Leichhardt NSW 2040
Petersham | P (02) 9335 2222 | E council@marrickville.nsw.gov.au | 2-14 Fisher Street, Petersham NSW 2049

IMPORTANT

If you need an interpreter, please call TIS National on 131 450 and ask them to call Inner West Council on 02 9367 9222.

You can also visit the TIS National website for translated information about the services TIS National provides. Visit www.tisnational.gov.au

IMPORTANTE

Se avete bisogno di un interprete, si prega di chiamare TIS National al numero 131 450 e chiedere loro di chiamare Inner West Council al numero 9367 9222. Il nostro orario di ufficio va dalle 8:30 alle 17:00, dal lunedì al venerdì.

Potete anche visitare il sito web di TIS National per ottenere informazioni tradotte sui servizi forniti da TIS National. Visitate www.tisnational.gov.au

IMPORTANTE

Si necesita un intérprete, por favor llame a TIS National en el 131 450 y pida que lo comuniquen con Inner West Council en el 02 9367 9222. Nuestro horario de oficina es 8:30am-5pm, de lunes a viernes.

También puede visitar el sitio web de TIS National para obtener información acerca de los servicios que provee TIS National. Visite www.tisnational.gov.au

TIN QUAN TRONG

Nếu quý vị cần thông dịch viên, xin hãy gọi cho Dịch vụ Thông Phiên dịch Quốc gia (TIS Quốc gia) theo số 131 450 và yêu cầu họ gọi cho Inner West Council theo số 02 9367 9222. Giờ làm việc của chúng tôi là 8:30am-5pm, Thứ Hai-Thứ Sáu.

Quý vị cũng có thể vào thăm trang mạng của TIS Quốc gia để có thông tin về các dịch vụ mà TIS Quốc gia cung cấp. Hãy vào thăm www.tisnational.gov.au

ΣΗΜΑΝΤΙΚΟ

Αν χρειάζεστε διερμηνέα, καλέστε την Εθνική Υπηρεσία Διερμηνείας και Μετάφρασης (TIS National) στο 131 450 και ζητήστε να καλέσουν το Inner West Council στον αριθμό 02 9367 9222. Οι ώρες λειτουργίας μας είναι 8:30am-5pm, Δευτέρα-Παρασκευή.

Σχετικά με τις υπηρεσίες που παρέχονται από την Εθνική Υπηρεσία Διερμηνείας και Μετάφρασης, μπορείτε να επισκεφθείτε και τον ιστότοπο της υπηρεσίας στη διεύθυνση: www.tisnational.gov.au

重要信息

如果您需要口译员，请拨打 TIS National 的电话 131 450，请他们打电话给 Inner West Council，电话号码：02 9367 9222。我们的营业时间是周一至周五上午8时30分至下午5时。

你也可以访问TIS National 的网站，了解 TIS National 提供的服务。网址：www.tisnational.gov.au

IMPORTANTE

Se precisar de um intérprete, telefone para o TIS National no número 131 450 e peça para chamarem o Inner West Council no número 02 9367 9222. Nosso horário de funcionamento é das 8h30 às 17h, de segunda a sexta-feira. Você também pode visitar o sítio do TIS National para buscar informações traduzidas sobre os serviços que o TIS National oferece. Visite www.tisnational.gov.au

Firstly, however, I think you will find the following context useful in putting together this information. The Leichhardt, Marrickville and Ashfield LEP areas will remain planning units / areas until the current LEPs and Development Control Plans (DCPs) are integrated. The Greater Sydney Commission (GSC) District Plan will provide a sub-regional strategy in the near future and to that extent this Planning Proposal is premature. In addition although SGS have reported on industrial land in Leichhardt and employment land in Marrickville recently there is no parallel report for Ashfield where the industrial land supply is negligible.

Therefore in broad terms any Planning Proposal to rezone industrial land should demonstrate that it has thoroughly taken the prospective short, medium and long term loss of other industrial precincts and sites in the Leichhardt LEP area into account and whether there are more suitable sites in the LEP area that could accommodate the proposed number of dwellings.

This makes the short to medium term loss of the following four Leichhardt remaining thirteen industrial precincts, which were identified in the August 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning particularly important, especially as this Review is being used by the GSC to prepare its District Plans. These four precincts are:

- Parramatta Road, Mallet Street, Pyrmont Bridge Road - known as Camperdown by Council.
- Parramatta Road, Tebbutt Street - known as Tebbutt Street by Council.
- Bays Precinct, particularly Rozelle Railyards.
- Lords Road.

Three of these four precincts are among the largest existing industrial precincts in the Leichhardt LEP area. The Draft Parramatta Road Urban Transformation Strategy (DPRUTS) shows Camperdown and Tebbutt Street as rezoned to residential and mixed use with no industrial land. The Rozelle Railyards are also compromised as industrial land by Westconnex and a major light rail stabling facility. The terms of the Gateway Determination for the Lords Road site strongly suggest that it will be rezoned to residential in the near future.

The HillPDA Economic Impact Assessment suggests that the Marrickville SGS Employment Lands Study shows surplus industrial land in that LEP area, but it does not bear in mind that this Study does not factor in the prospective substantial loss of industrial land through the Sydenham to Bankstown Urban Renewal Corridor project.

Furthermore the loss of industrial land to mixed and residential uses results in a larger resident population that requires more industrial land to serve its needs.

Consequently can you please arrange for the HillPDA Economic Impact Assessment to address the following matters with additional information and analysis:

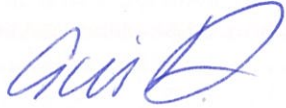
1. Full and detailed assessment of the Planning Proposal against the Council's Employment and Economic Development Plan (EEDP) page 55 criteria for consideration of proposed rezonings of industrial land, including and thorough market analysis and the matters specified in the following points 2 to 18.
2. Detailed consideration of the importance of the Leichhardt LEP area industrial precincts identified in the August 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning and their relative suitability for industrial uses.

3. In particular the Economic Impact Assessment should model the impacts of the loss of the four precincts identified above and the prospective residential population growth that would be generated by the rezoning of these sites.
4. Similarly as you and HillPDA consider that the existing industrial land supply in the Marrickville LEP area can provide population serving industrial land for the growing populations of the Leichhardt, Marrickville and by implication Ashfield LEP areas the Economic Impact Assessment should model how the existing Marrickville industrial land would accommodate the projected residential population growth in these three LEP areas and the loss of industrial land in Marrickville through the Sydenham to Bankstown Urban Renewal Corridor and other projects.
5. A transport analysis of whether population serving industrial land in the southern part of the Marrickville LEP area would be accessible to residents of northern Lilyfield and Rozelle in practical terms such as travel times using active / public / private transport in peak period traffic, if such industries would be open to customers at weekends if weekday travel times were impractically long etc.
6. Analysis of whether development of a technology park at White Bay Power Station and parallel improvements to road and public infrastructure, including the major Westconnex / Iron Cove / Beaches tunnels Rozelle Railyards interchange, would increase demand for industrial floorspace in the north Lilyfield and Rozelle suburbs.
7. A numerical breakdown of how the existing first floor space available to artists will be replaced and the current artist tenants accommodated in the proposed redevelopment. This should include information on how many artists currently work in the first floor studio space, how much floorspace each occupies, how these spaces will be provided in the redevelopment, comparative rental costs and lease terms and any mechanism that would be used to prevent rentals for artists' spaces becoming prohibitively expensive.
8. Clarification of the full time equivalent nature of the existing and estimated new jobs and the nature of the skills that the existing workers and new workers would have. A comparative estimate and analysis of full time equivalents in the existing property, and for full time equivalents that would work in the Planning Proposal development or in a redevelopment for uses permitted in the IN2 zone. This section of the additional information should indicate what mechanism would be applied to ensure the full time equivalent jobs estimated by HillPDA would be created and sustained in the short, medium and long term.
9. Details of the market areas served by the existing businesses.
10. Analysis of the impact of the loss of almost 60% (10577sqm) of the total current overall industrial floorspace of 18,072 sqm (SGS Leichhardt Industrial Precinct Planning Review April 2016 Table 6) that would result from the proposed rezoning. This analysis should address the risk that a rezoning might lead to the fragmentation and eventual total loss of the remainder of the precinct.
11. Comparative and numerical impact analysis of the suitability of 469 - 483 Balmain Road for rezoning using the August 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning as a frame of reference and in particular Appendix C Summary of Health and Results By Precincts Table 26. This scores several Leichhardt LEP 2013 area industrial precincts as less suitable for industry than the Planning Proposal site. This is also the case for some of the industrial precincts in the Marrickville LEP area.
12. A similar comparative and numerical impact analysis of the suitability of 469 - 483 Balmain Road for rezoning against the SGS Leichhardt Industrial Precinct Planning Review April 2016 is required. This should particularly address why this property as the cornerstone of the Balmain Road industrial precinct should be rezoned when the SGS study recommends that if any Leichhardt LEP 2013 industrial precincts should be rezoned from IN2 the strategic best options would be Camperdown and Tebbutt Street, with Balmain Road retained.

13. Council also needs a numerical analysis of why the residential land needs for projected population growth for the Leichhardt LEP and the Inner West Council areas cannot be met on other sites that are already zoned for or are identified in State government strategies for residential or mixed use development. This analysis should include intensification of development on suitable residential lots and existing use non-residential lots in residential and business zones.
14. Statistical evidence should be provided to support the HillPDA Economic Impact Assessment assertion on pages 24 and 25 that the Planning Proposal site could not be commercially viable for light industrial uses such as high value urban manufacturing, creative businesses and local services. The HillPDA reference to accessibility constraints is incorrect as their own August 2015 Industrial Precinct Review for the NSW Department of Planning scores the site on the higher side of average under "Location, Functions and Connections" and the SGS Leichhardt Industrial Precinct Planning Review April 2016 confirms the site's accessibility for industrial uses as good. The HillPDA Economic Impact Assessment suggestion that this site has parking and buffer zone constraints is also misleading in that all inner city industrial precincts will tend to have this type of characteristic at the interface with neighbouring land uses, without this being a strong planning reason to rezone such precincts to residential or mixed use.
15. The Economic Impact Assessment Inner West Supply Pipeline section should be expanded to cover additional aspects of supply such as the time parameters; the reliability and comprehensiveness of Cordells Connect for example in relation to exempt and complying industrial developments; the impact of the prospect of continuing loss of zoned industrial land in relation to serving the needs of a growing population; and analysis of the point at which a potential shortage of zoned industrial land renders it more valuable than residential land.
16. The Residential Assessment section of the Economic Impact Assessment needs to address the affordability of the proposed apartments for very to low income, moderate income and key workers such as police, fire service, nurses and teachers. Very low income is defined as less than 50% of the Sydney median income, low income as between 50% and 80% of the Sydney median and moderate as between 80% and 120% of the Sydney median.
17. The Employment Demographics and Policy Perspective sections of the Economic Impact Assessment makes a number of claims that need to be substantiated as follows:
 - Office-based employment would reduce congestion and increase passing trade - demonstrate that these factors would not apply equally to uses if the industrial zoning is retained.
 - The character of the area is a mix of business, industry, residential, institutional and parkland - demonstrate why rezoning would be a better planning outcome than retaining this mix.
 - Proximity to the CBD, light rail and major bus routes makes the site more suitable for residential development - demonstrate why this proximity is not equally or more beneficial for IN2 zoning land uses.
 - Developing the site for residential uses will support the local centre - demonstrate why more intensive use of the site by IN2 permissible uses would not provide more local centre support than a potentially largely dormitory apartment development.
18. What would the economic impacts be for the construction phase of a new industrial development for use by multiple urban manufacturers, creative businesses and local services?

Should you have any questions or require additional information, please contact Roger Rankin 9367 9174.

Yours sincerely



Gill Dawson
MANAGER ENVIRONMENT AND URBAN PLANNING

Friday, November 04, 2016

Ms Gill Dawson
Manager Environment and Urban Planning
Inner West Council
7-15 Wetherill Street
Leichhardt NSW 2040
Email: leichhardt@lmc.nsw.gov.au

Dear Ms Dawson

RE: 469 – 483 Balmain Road, Lilyfield – Pre-Planning Proposal

I write with reference to your letter dated 14 October 2016 regarding our Pre-Planning Proposal submission for the subject site.

Thank you for your comprehensive response. You have asked us to address several matters arising from the Hill PDA Economic Impact Assessment (EIA) numbered 1-18 in Council's letter. We have attached a table which provides Hill PDA's response to each of the matters raised. This response now forms part of the Planning Proposal.

The Planning Proposal for the rezoning of Industrial zoned land to a Mixed Use zone aims at delivering a better planning and employment outcome for the site and is based on evidence prepared by highly regarded consultants in their respective fields. It is consistent with the State Government guidelines for re-zoning industrial land and widely accepted merit based planning assessment practice.

We are concerned to ensure that the proposal is considered on its merits and within the strategic settings that apply to the local and broader metropolitan area. With this context in mind, we assert that the assessment undertaken by our project team demonstrates that this site can be supported for re-zoning on any reasonable assessment of the merits of the case.

The attached table addresses a number of the issues raised in Council's letter, however, many of the issues are of a broader regional and subregional strategic nature, and would therefore be more appropriately dealt with at that level.

Further, some of the issues raised (eg. Sydenham to Bankstown corridor) are yet to be decided by Government. In that context, the Planning Proposal justifies the rezoning outcome relying on established policies and evidence within a high level strategic context.

The Planning Proposal has demonstrated strategic merit through an evidence based assessment that relates to the site and its surrounds. It is not possible nor appropriate to also assess other sites in more detail than what is presented to establish a comparative - analysis or otherwise.

The site is a relatively small, stand-alone, parcel of land of limited strategic industrial /employment value surrounded by residential development. It is not part of an integrated, viably functioning, industrial precinct. The proposal will deliver better employment outcomes which are more relevant and intrinsically linked to the evolving and growing community.

We fully appreciate the significance of the potential employment issues when proposing to rezone industrial land for an alternative purpose, in this case mixed use. For this reason we engaged Hill PDA to undertake the EIA in support of the Planning Proposal.

Hill PDA note in the table attached, that many of the requests are outside the scope of an EIA that are typically required for re-zoning planning proposals – particularly where they are of such modest scope as that for the Subject Site.

Further to the attached table, we wish to emphasise the following key points as they establish important points of context for Council's merit based assessment of this Planning Proposal.

- The subject site differs from other industrial areas in the LGA as it has the benefit of being located in the Roselle/Lilyfield high street. It is further benefited by a significant frontage opposite Callan Park. The current uses add nothing to this important streetscape and represent a significant underutilisation of the site;
- The surrounding residential development makes the potential for land use conflict from an increased industrial use on the site more pertinent.
- Council's comments suggest a local LGA view on the use and value of industrial and service industrial land. The usage pattern of such land is more appropriately analysed on a metro-scale and as such, the site is within easy travel time of major industrial areas at Artarmon, Southern Sydney, Parramatta Road etc. The usage of industrial land is not determined by LGA boundaries
- The location of industrial land closely follows the demographics of the surrounding workforce, access to markets and the availability of (mostly) road infrastructure.

We commend the Planning Proposal as submitted and the further information provided to Council and look forward to working with Council during its formal assessment.

Yours sincerely



Michael File

Director

Phone: 0433 458 984

E-mail: Michael@fileplanning.com

Issue Number	Issue Details	HillPDA Response
1	Full and detailed assessment of the Planning Proposal against the Council's Employment and Economic Development Plan (EEDP) page 55 criteria for consideration of proposed rezonings of industrial land, including (sic) and thorough market analysis and the matters specified in the following points 2 to 18.	The draft planning proposal has specifically included an assessment against criteria in the Council's EEDP.
2	Detailed consideration of the importance of the Leichhardt LEP area industrial precincts identified in the August 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning and their relative suitability for industrial uses.	<p>The HillPDA Industrial Precinct Review for the NSW Department of Planning awarded the Balmain Road precinct a score of 9.5 out of 15 across the three criteria measured. It was awarded a score of 3 across the investment and business criteria and economic output and jobs criteria and a score of 3.5 across the location, function and connections criteria. A score of 3 for a 'criteria' was deemed 'average'.</p> <p>The average score across the Leichhardt LGA was also 9.5, but there were four precincts within the LGA that scored lower in total overall across the three criteria than the Balmain Road precinct. These were Lords Road; Marion/Walter Street; Victoria Road, Robert Street (East of Mullens Street); and Victoria Road, Terry Street/Wellington Street.</p> <p>With respect to Leichhardt, the HillPDA review noted: 'Whilst agents identified that almost all of the areas across the Central Subregion were in high demand for industrial space, Leichhardt was highlighted as a very small industrial pocket, which was in lower demand by larger users. This was largely due to the high price barrier, difficult access and manoeuvrability in and out of the Precinct.' (pg. 82)</p> <p>In addition, it was noted that: 'Having undertaken consultation with local representatives, agents, market research and HillPDAs industry knowledge, it was found that the industrial area at Leichhardt was highlighted as a potential area by Agents for rezoning, due to its small size and residential surroundings. As such, speculation has occurred, making some areas not viable for industrial uses.' (pg. 83)</p>

Issue Number	Issue Details	HillPDA Response
3	<p>In particular the Economic Impact Assessment should model the impacts of the loss of the four precincts identified above and the prospective residential population growth that would be generated by rezoning of these sites. [These precincts were identified as: Camperdown, Tebbutt Street, Bays Precinct, particularly Rozelle Railyards and Lords Road].</p>	<p>It is outside of the scope of requirements for an EIA to accompany this Planning Proposal to model the impacts of the future loss of industrial precincts associated with the Bays Precinct and Parramatta Road Urban Transformation projects — or the future loss of the industrial precinct at Lords Road. Further, it is entirely possible that the transformation of the sites mentioned could result in a significant increase in employment and even industrial use, particularly when you consider that the current uses for large parts of these sites provide no actual contribution to industrial land use due to their long-standing redundancy.</p>
4	<p>Similarly as you and HillPDA consider that the existing industrial land supply in the Marrickville LEP can provide population serving industrial land for the growing populations of the Leichhardt, Marrickville and by implication Ashfield LEP areas the Economic Impact Assessment should model how the existing Marrickville industrial land would accommodate the projected residential population growth in these three LEP areas and the loss of industrial land in Marrickville through the Sydenham to Bankstown Urban Renewal Corridor and other projects.</p>	<p>The statements made in the Planning Proposal and in the EIA stand on their merits. It is not possible to speculate as to how, when or where the transformation of the Sydenham to Bankstown corridor will manifest in terms of loss of industrial land. Further, it is outside of the scope of requirements for an EIA to accompany this Planning Proposal to undertake a strategic planning review of future employment lands for the whole Inner West LGA.</p>
5	<p>A transport analysis of whether population serving industrial land in the southern part of the Marrickville LEP area would be accessible to residents of northern Lilyfield and Rozelle in practical terms such as travel times using active / public / private transport in peak period traffic, if such industries would be open to customers at weekends if weekday travel times were impractically long etc.</p>	<p>A transport analysis covering the future accessibility of industrial lands within the Marrickville and Leichhardt LGAs is outside of the scope of requirements for an EIA to support this Planning Proposal.</p>

Issue Number	Issue Details	HillPDA Response
6	<p>Analysis of whether development of a technology park at White Bay Power Station and parallel improvements to road and public infrastructure, including the major Westconnex /Iron Cove /Beaches tunnels Rozelle Railyards interchange, would increase demand for industrial floorspace in the north Lilyfield and Rozelle suburbs.</p>	<p>An assessment of the impact of a future redevelopment of the White Bay Power Station is outside of the scope of requirements for an EIA to support this Planning Proposal. However, the rise of the knowledge economy is testament to the changing nature of demand for industrial floorspace and the provision of flexible commercial office space at the Subject Site could in the future accommodate businesses with linkages to the planned technology park at White Bay Power Station.</p> <p>The Subject Site will be impacted by WestConnex. A proposed underground connection between the planned interchange within the Rozelle Rail Yards and Iron Cove Bridge is projected to lead to a halving of traffic on Victoria Road, reducing the exposure of industrial uses to passing trade but improving access for local residents to key public transport services, including dedicated bus lanes on Victoria Road. WestConnex therefore would support the Subject Site’s residential uses.</p>
7	<p>A numerical breakdown of how the existing first floor space available to artists will be replaced and the current artist tenants accommodated in the proposed redevelopment. This should include information on how many artists currently work in the first floor studio space, how much floorspace each occupies, how these spaces will be provided in the redevelopment, comparative rental costs and lease terms and any mechanism that would be used to prevent rentals for artists’ spaces becoming prohibitively expensive.</p>	<p>802sqm is currently tenanted by approximately 50 artists in partitioned spaces. The days/hours of usage of the partitioned spaces varies for each artist.</p> <p>400sqm is designated for artist/gallery space in an open and multipurpose layout. How this space is ultimately configured will be determined by the artists themselves. Given that the existing artist space is underutilised in terms of intensity of usage at any given time, it is anticipated that the proposed 400sqm space would be sufficient to accommodate the requirements of the artists using the existing facilities through more efficient usage of space, including areas for artist storage when not on site, rather than requiring a permanent partitioned space.</p>

Issue Number	Issue Details	HillPDA Response
8	<p>Clarification of the full time equivalent nature of the existing and estimated new jobs and the nature of the skills that the existing workers and new workers would have. A comparative estimate and analysis of full time equivalents in the existing property, and for full time equivalents that would work in the Planning Proposal development or in a redevelopment for uses permitted in the IN2 zone. This section of the additional information should indicate what mechanism would be applied to ensure the full time equivalent jobs estimated by HillPDA would be created and sustained in the short, medium and long term.</p>	<p>The Subject Site is currently tenanted by a range of businesses and there are also two residential apartments on site. Approximately half of the non-residential floorspace is currently let by a furniture wholesaler employing 12 persons. Industrial uses comprise a carpentry business employing 2 persons and an aluminium window manufacturer employing 10 persons. It is estimated that there are a total of 26 employees at the Subject Site.</p> <p>Employment achieved as a result of the Planning Proposal has been estimated using an employment density of 1 person per 23 square metres for the projected 1,200sqm of retail/commercial space and a working-from-home ratio for residents of 1 person per 14 units. (This latter calculation is based on estimates from an Australian Bureau of Statistics report entitled ‘Locations of Work, Nov 2008’ and Census 2011 demographic data.)</p> <p>It is not practicable or necessary for a Planning Proposal to provide a guarantee on the nature of permitted employment uses that would eventuate at a proposed development.</p>
9	<p>Details of the market areas served by the existing businesses.</p>	<p>The Subject Site's current light industrial uses account for a comparatively low proportion of tenanted space and employment creation and are not directly supporting businesses within the Rozelle commercial centre or providing local industry services to local residents.</p>
10	<p>Analysis of the impact of the loss of almost 60% (10577sqm) of the total current overall industrial floorspace of 18072 sqm (SGS Leichhardt Industrial Precinct Planning Review April 2016 Table 6) that would result from the proposed rezoning. This analysis should address the risk that a rezoning might lead to the fragmentation and eventual total loss of the remainder of the precinct.</p>	<p>HillPDA recognises that there is an increased probability that – as a result rezoning of the Subject Site for mixed uses – a rezoning would be sought in the future for the remainder of the precinct.</p> <p>It is HillPDA’s opinion that mixed uses would comprise the highest and best use for the Subject Site and this assessment would also apply to the remainder of the Balmain Road precinct.</p>

Issue Number	Issue Details	HillPDA Response
11	<p>Comparative and numerical impact analysis of the suitability of 469-483 Balmain Road for rezoning using the August 2015 HillPDA Industrial Precinct Review for the NSW Department of Planning as a frame of reference and in particular Appendix C Summary of Health and Results by Precincts Table 26. This scores several Leichhardt LEP 2013 area industrial precincts as less suitable for industry than the Planning Proposal site. This is also the case for some of the industrial precincts in the Marrickville LEP area.</p>	<p>The Balmain Road precinct scored 9.5 out of 15 across the three criteria used in the Industrial Precinct Review undertaken in 2015 by HillPDA on behalf of the NSW Department of Planning (as per Table 26, Appendix C). The average score across the Leichhardt LGA was also 9.5, but there were four precincts within the LGA that scored lower in total across the three criteria than the Balmain Road precinct. These were Lords Road; Marion/Walter Street; Victoria Road, Robert Street (East of Mullens Street); and Victoria Road, Terry Street/Wellington Street.</p> <p>The HillPDA Industrial Precinct Review was a high-level assessment of industrial lands for the whole of Sydney. It was not intended to stifle the assessment of individual precincts based on the merits of a submitted Planning Proposal.</p> <p>Of note is that the only specific references to Leichhardt in the HillPDA report (other than the criteria scores) relate to conversations had with agents with regards to the LGA's industrial precincts:</p> <ul style="list-style-type: none"> ■ With respect to Leichhardt the HillPDA review noted: 'Whilst agents identified that almost all of the areas across the Central Subregion were in high demand for industrial space, Leichhardt was highlighted as a very small industrial pocket, which was in lower demand by larger users. This was largely due to the high price barrier, difficult access and manoeuvrability in and out of the Precinct.' (pg. 82) ■ In addition, it was noted that: 'Having undertaken consultation with local representatives, agents, market research and HillPDAs industry knowledge, it was found that the industrial area at Leichhardt was highlighted as a potential area by Agents for rezoning, due to its small size and residential surroundings. As such, speculation has occurred, making some areas not viable for industrial uses.' (pg. 83)

Issue Number	Issue Details	HillPDA Response
12	<p>A similar comparative and numerical analysis of the suitability of 469-483 Balmain Road for rezoning against the SGS Leichhardt Industrial Precinct Planning Review April 2016 is required. This should particularly address why this property at the cornerstone of the Balmain Road industrial precinct should be rezoned when the SGS study recommends that if any Leichhardt LEP 2013 industrial precincts should be rezoned from IN2 the strategic best options would be Camperdown and Tebbutt Street, with Balmain Road retained.</p>	<p>SGS note the following with respect to the Camperdown, Tebbutt Street and Balmain Road precincts:</p> <p>Tebbutt Street/Parramatta Road — ‘The precinct’s location along Parramatta Road and Tebutt Street (which is an important north-south link to the City West Link) gives the precinct a strategic location to service both a local and subregional catchment’ (pg. 66).</p> <p>Camperdown — ‘The precinct’s proximity to the CBD and good arterial road access, coupled with its size and large floorplate units, mean that the Camperdown precinct is a strategically important light industrial area for both Leichhardt and the wider central subregion’ (pg. 68).</p> <p>Balmain Road — ‘The precinct has large floorplates considering the relatively small size of the precinct and the clear vehicular access around three of the precinct’s sides are an important attribute, especially as vehicles do not have to travel along many local roads to access the precinct’ (pg. 54).</p> <p>The above commentary from the SGS report recognises that the Camperdown and Tebbutt Street/Parramatta Road precincts both have superior strategic locations compared to the Balmain Road precinct. SGS recommends that all industrial land is retained within the Leichhardt LGA. If indeed the SGS report suggests as posited that the ‘strategic best options’ for rezoning would be Camperdown and Tebbutt Street precincts, the report indicates that this reflects pressures resulting from the urban renewal program planned for the Parramatta Road Corridor.</p>
13	<p>Council also needs a numerical analysis of why the residential land needs for projected population growth for the Leichhardt LEP and the Inner West Council areas cannot be met on other sites that are already zoned for or are identified in State government strategies for residential or mixed use development. This analysis should include intensification of development on suitable residential lots and existing use non-residential lots in residential and business zones.</p>	<p>This is outside of the scope of an EIA required to support this Planning Proposal. However, it is a matter on record that from a strategic perspective, the NSW Government is concerned to ensure growth in housing supply in areas located in proximity to transport corridors and connections to core areas of employment such as the Sydney CBD. The subject site comfortably meets this strategic imperative.</p>

Issue Number	Issue Details	HillPDA Response
14	<p>Statistical evidence should be provided to support the HillPDA Economic Impact Assessment assertion on pages 24 and 25 that the Planning Proposal site could not be commercially viable for light industrial uses such as high value urban manufacturing, creative businesses and local services. The HillPDA reference to accessibility constraints is incorrect as their own August 2015 Industrial Precinct Review for the NSW Department of Planning scores the site on the higher side of average under “Location, Functions and Connections” and the SGS Leichhardt Industrial Precinct Planning Review April 2016 confirms the site’s accessibility for industrial uses as good. The HillPDA Economic Impact Assessment suggestion that this site has parking and buffer zone constraints is also misleading in that all inner city industrial precincts will tend to have this type of characteristic at the interface with neighbouring land uses, without this being a strong planning reason to rezone such precincts to residential or mixed use.</p>	<p>It is beyond the requirements of an EIA to support this Planning Proposal to hypothesise on the possibility that some long term viable future use compliant with an IN2 zoning could be found for the Subject Site.</p> <p>The Subject Site is in a predominantly residential area and therefore the assertion that it has accessibility constraints/considerations relative to alternative sites that are not surrounded by residential uses is valid.</p>
15	<p>The Economic Impact Assessment Inner West Supply Pipeline section should be expanded to cover additional aspects of supply such as the time parameters; the reliability and comprehensiveness of Cordell’s Connect for example in relation to exempt and complying industrial developments; the impact of the prospect of continuing loss of zoned industrial land in relation to serving the needs of a growing population; and analysis of the point at which a potential shortage of zoned industrial land renders it more valuable than residential land.</p>	<p>Cordell Connect is a highly regarded authority on construction activity and provides up-to-date information on projects from their conception through to construction. This includes projects which do not require a planning proposal and/or development application.</p> <p>Projecting the future industrial land requirements for the whole Inner West Council and the outlook for industrial land prices vis-à-vis residential land within the LGA is beyond the requirements of an EIA to support this Planning Proposal.</p>
16	<p>The Residential Assessment section of the Economic Impact Assessment needs to address the affordability of the proposed apartments for very to low income, moderate income and key workers such as police, fire service, nurses and teachers. Very low income is defined as less than 50% of the Sydney median income, low income as between 50% and 80% of the Sydney median and moderate as between 80% and 120% of the Sydney median.</p>	<p>The Planning Proposal intends to provide at least 3% of the development for affordable housing. This floor space, based on an average apartment size of 80sqm, equates to 5 apartments. In addition to this 400sqm of artist/gallery space is proposed to be included for public benefit associated with the Planning Proposal and 11% of the site area is proposed to be utilised for footpath widening and to provide a pedestrian link from Fred Street to Alberto Street. The above would form the basis of a Voluntary Planning Agreement with Inner West Council.</p>

Issue Number	Issue Details	HillPDA Response
17	<p>The Employment Demographics and Policy Perspective sections of the Economic Impact Assessment makes a number of claims that need to be substantiated as follows:</p> <ul style="list-style-type: none"> ▪ Office-based employment would reduce congestion and increase passing trade – demonstrate that these factors would not apply equally to uses if the industrial zoning is retained. ▪ The character of the area is a mix of business, industry, residential, industrial and parkland – demonstrate why rezoning would be a better planning outcome that retaining this mix. ▪ Proximity to the CBD, light rail and major bus routes makes the site more suitable for residential development – demonstrate why this proximity is not equally or more beneficial for IN2 zoning land uses. ▪ Developing the site for residential uses will support the local centre – demonstrate why more intensive use of the site by IN2 permissible uses would not provide more local centre support than a potentially largely dormitory apartment development. 	<p>It is beyond the requirements of an EIA to support this Planning Proposal to provide evidence that there is no possible future redevelopment under an IN2 zoning that would be more consistent with the characteristics described than the Planning Proposal.</p> <p>The Subject Site is surrounded by residential uses and is a highly desirable place to live as attested to by the high median house and unit prices for Lilyfield suburb relative to Greater Sydney levels.</p> <p>The Planning Proposal is in accordance with State and Local Planning Strategies, providing significant additional housing and an increase in dwelling mixture choice in close proximity to transport and employment.</p> <p>The current uses at the Subject Site are predominantly related to wholesale activities, servicing businesses rather than residential populations. There is therefore little benefit to these industries from being co-located with public transport.</p> <p>Traditional IN2 uses for residential populations are associated with a preponderance of car based trips owing to the bulky nature of items retailed or – in the case of automotive services – the requirement of a car to take advantage of the services on offer.</p>

Issue Number	Issue Details	HillPDA Response
18	<p>What would the economic impacts be for the construction phase of a new industrial development for use by multiple urban manufacturers, creative business and local services?</p>	<p>The base case used for the Economic Impact Assessment is 'no change'. This is a reasonable assumption given that the existing buildings are still functional and largely occupied.</p> <p>The economic impacts during the construction phase are proportional to the size of the construction project. The cost range for multi-storey warehouse construction in Sydney provided in the Rawlinson's Australian Construction Handbook (Edition 34, pg. 46) is \$1,445/sqm to \$1555/sqm of GFA. In comparison, the cost range for a high end multi-unit apartment building with one or two bedroom units is between \$2,690/sqm and \$2,895/sqm. Given that the Planning Proposal is seeking an FSR of 2:1, whereas the maximum FSR under the current zoning is 1:1, this suggests that the construction costs — and therefore the impacts — would be around three times as large under the Planning Proposal compared to a redevelopment for IN2 uses.</p>