



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:

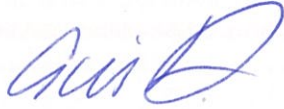
1. Full and detailed assessment of the Planning Proposal against the Council's Employment and Economic Development Plan (EEDP) page 55 criteria for consideration of proposed rezonings of industrial land, including and thorough market analysis and the matters specified in the following points 2 to 18.
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 Railways 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

A handwritten signature in blue ink, appearing to read 'Gill Dawson', with a stylized flourish at the end.

Gill Dawson
MANAGER ENVIRONMENT AND URBAN PLANNING