

13 February 2017

Ms Gill Dawson  
Manager Environment and Planning  
7 -15 Wetherill St,  
Leichhardt NSW 2040

**469 – 483 Balmain Road, Lilyfield - Planning Proposal**

Dear Gill,

Thank you for your most recent letter of 9 December 2016, the following letter endeavors to provide a comprehensive response to the additional issues raised.

Attached to this letter are the following responses:

**Appendix 1** contains an updated response from Hill PDA to the issues raised in relation to the proposed change of use and economic justification.

**Appendix 2** contains the requested detailed urban design analysis from Roberts Day in the form of an excerpt from the urban design study.

**Appendix 3** contains an analysis of the proposal against the recently released draft Central District plan and relevant council strategies as identified in Councils letter.

I trust this further information allows Council to complete its assessment and favourably consider the planning proposal. After many years of uncertainty regarding the future use of the site the landowner is keen to see the site evolve in such a way as to provide a positive contribution to the local area.

We are available at your convenience to meet and discuss the progression of the proposal and would appreciate an opportunity to present the proposal to the Inner West Council, Local Representation and Advisory Committee, as discussed at our recent meeting.

We look forward to continuing to work with you.

Best regards



Michael File  
Director  
FPD

## **Appendix 1 – Hill PDA response**

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 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            | <p>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> <p>The August 2015 HillPDA Industrial Precinct Review specifically states in its Summary that "Smaller precincts that were functioning well generally scored between 9 and 10.5" and their 4 November comment is about Leichhardt LGA in general and not the small Balmain Road in particular. In addition, page 83 of the August 2015 HillPDA Industrial Precinct Review also states that "Small local industry, (furniture storage and renovation, printerries, food production and creative industries) would however flourish in this location" apparently meaning Leichhardt LGA and again the 4 November comment does not address this issue of the potential for Balmain Road to flourish. The draft Central District Plan echoes this theme with its references to "employment and urban services land" precincts.</p> <p>The 4 November comment refers to agents saying there was lower demand by large users in Leichhardt LGA, while ignoring the p81 reference in the August 2015 HillPDA Industrial Precinct Review to there being "a stronger price-driven demand for smaller industrial space (under 500sqm)". Balmain Road is pre-eminently suitable for the creation of small units within the property. We would also need to see evidence collected from agents in order to establish how comprehensive and detailed that data is in relation to Balmain Road in particular.</p> | <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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|              |               | <p>HillPDA notes that "a precautionary approach to rezoning employment and urban services lands", is outlined in the draft Central District Plan (pg. 69).</p> <p>HillPDA also notes that the draft Central District Plan recommends a "district-wide" perspective with respect to assessing the relative merits of employment and urban services land precincts (pg. 69).</p> <p>The Plan asserts that the GSC will work together with Councils to "investigate how these areas operate, the range of uses they support, their industry and supply chains, their interdependencies, key constraints, and opportunities to be strengthened" (pg. 69).</p> <p>The current uses onsite are by a disparate group of industries with no obvious interdependencies and supply-chain linkages that could be adversely impacted by their relocation. Importantly, the presence of a large dilapidated buildings and the proposed retention of the character building constrains the site's potential adaptive uses.</p> <p>In contrast, there is demonstrated strong demand for residential development in Lilyfield suburb and an underrepresentation of apartment builds. The provision of high density residential development within close proximity to transport and employment is consistent with the directions of "A Plan for Growing Sydney". The proposed development is also projected to provide employment levels over and above the current levels based on the application of appropriate employment density ratios for the proposed end uses - commercial/studio/retail.</p> <p>The provision of creative, commercial and retail space on the Subject Site is consistent with traditional demand for small commercial spaces while also being compatible with the requirements of many existing and emerging businesses in the new economy. Commercial floorspace provision is consistent with the existing composition of the former Leichhardt LGA's resident workforce (as at Census 2011) and projected employment growth by</p> |

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 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>The 4 November HillPDA comment on this point is speculative and Council will need a more conclusive evidence base to assess this Planning Proposal thoroughly. The key issue here is the potential use of these precincts for industrial enterprises. If they are gone they cannot be used for industrial land to serve the rapidly growing city and inner city population and economy. The PRUTS proposed transformation of Camperdown to "biotechnology, education and health research uses" is not going to provide the type of industrial uses and employment that might evolve at Lords Road, Rozelle Railyards or the Balmain Road industrial precinct.</p> <p>The 4 November 2016 HillDPA comment says this modelling is outside the scope of an Economic Impact Assessment. However, Councils and proponents can set the scope for such Assessments. Indeed the second line on page 5 of "A guide to preparing planning proposals" states that the RPA is responsible for the content of the planning proposal</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> <p>HillPDA notes that page 5 of a "A guide to preparing planning proposals" also states that <i>"The level of detail required in a planning proposal should be proportionate to the complexity of the proposed amendment"</i>.</p> <p>The planning proposal for 469-483 Balmain Road, Lilyfield covers a 0.7ha site. Council's request to model the impacts of the loss of four precincts totalling 93.97ha is disproportionate to the complexity of the proposed amendment.</p> <p>However, HillPDA notes that while the Bays Precinct and Rozelle Railyards have industrial zonings they have not been used for compatible uses for</p> |

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|              | and the quality of the information provided in support of the proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>several decades. UrbanGrowth NSW's proposed revitalisation of these precincts responds to economic and demographic trends: Rozelle Railyards will be used for high density residential development; White Bay Power Station is proposed as a global centre for high-tech jobs.</p> <p>The revitalisation of the Camperdown precinct as part of PRUTS similarly reflects changing demand for land uses; a sizeable proportion of the existing industrial uses on the Camperdown precinct are non-traditional, catering to the retail and recreational needs of local populations.</p> <p>The provision of professional suites on the Subject Site is consistent with traditional demand for small commercial spaces while also being compatible with the requirements of many existing and emerging businesses within the new economy.</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>We need evidence to substantiate the HillPDA claim and their 4 November 2016 point about the scope of an EIA and transport analysis is incorrect as per page 5 of "A guide to preparing planning proposals".</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> <p>Council's request to model industrial lands capacity for the entire Inner West Council region is disproportionate to the complexity of the proposed amendment on a 0.7ha site.</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>See comment above regarding line 2 of page 5 of "A guide to preparing planning</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> <p>As stated in the planning proposal, the Marrickville/Sydenham Industrial precinct is only 6km by road from the Subject Site. Sydenham station is contiguous with the southern end of the precinct. The precinct is accessible</p>                                                                                                                                                                                                                                                                                                                                                                                     |

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                              | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|              | proposals"                                                                                                                                                                                                                                                                                                                                                                                                                                 | through a combination of light rail, bus and train modes from Lilyfield with a journey time of between 40 and 50 minutes in peak periods.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 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>See comment above regarding line 2 of page 5 of "A guide to preparing planning proposals"</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> <p>Council's request is disproportionate to the complexity of the proposed amendment sought by the planning proposal.</p> <p>Any exercise to assess the nature of future activities at the technology park and the type of industrial support uses that would be required for those activities would be highly speculative.</p> <p>The provision of creative, commercial and retail space on the Subject Site is consistent with traditional demand for small commercial spaces while also being compatible with the requirements of many existing and emerging businesses within the new economy.</p> |

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| 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>The 4 November 2016 HillPDA response to this point suggests around 50 artists sharing 400sqm including storage space for these artists. Can the Planning Proposal please document the consultation and engagement that has taken place with the artists on this matter.</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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 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 4 November 2016 HillPDA response is unhelpful. Evidence is required to be provided that there will be a better employment outcome for the site if it is rezoned than retaining the existing industrial zoning.</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> <p>The proposed development is projected to provide employment levels over and above the current levels based on the application of appropriate</p> |



| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>employment density ratios for the proposed category of uses.</p> <p>See response to point 2.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 9            | <p>Details of the market areas served by the existing businesses.</p> <p>The HillPDA 4 November 2016 response appears to assume this question is simply about whether the existing businesses serve the local community and economy, when in fact Council wants to establish whether these businesses and this property perform a wider servicing role for the Central District and beyond from this location. Again the need for "employment and urban services" land needs to be addressed more thoroughly.</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> <p>See response to point 2.</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>The HillPDA 4 November 2016 conclusion about the probability of the rest of the precinct being lost to industrial uses if the subject site is rezoned needs to be included in the Planning Proposal along with an analysis of how this would contribute to the cumulative loss of industrial land in the former Leichhardt LGA.</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>                                                                                                                                                                                                                                                   |
| 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 HillPDA 4 November 2016 response sidesteps the issue of whether this site is better than other poorer scoring industrial sites in the area. Their selective focus on</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</p> |

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|              | <p>conversations with agents is insufficient evidence as it avoids other relevant findings of the August 2015 HillPDA Industrial Precinct Review as pointed out in the Council comment provided under point 2.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>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"> <li>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)</li> <li>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)</li> </ul> |
| 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>The HillPDA 4 November 2016 response does not answer this question. PRUTS rezones Camperdown and Tebbutt Street and justification for losing the Balmain Road precinct with its new ranking as the third largest industrial precinct left in the</p> | <p>SGS note the following with respect to the Camperdown, Tebbutt Street and Balmain Road precincts:</p> <p><b>Tebbutt Street/Parramatta Road</b> — '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><b>Camperdown</b> — '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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|              | former Leichhardt LGA required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p><b>Balmain Road</b> — ‘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>All industrial precincts in the former Leichhardt LGA would meet the NSW Government "imperative" for growth in housing supply in areas close to transport corridors stated by HillPDA so their 4 November response. Evidence is required that the need for residential land cannot be met on other more appropriate sites.</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> <p>Council's request for information is disproportionate to the complexity of the proposed amendment sought in the planning proposal.</p>                                                                                                                                                                                                                                                                                                                                       |
| 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</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 is has accessibility constraints/considerations relative to alternative sites that are not surrounded by residential uses is valid.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | HillPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | <p>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>The HillPDA 4 November 2016 response that an EIA does not hypothesise about potential viability for light industrial uses is flawed, as the EIA already hypothesises about other uses on the site such as commercial suites for professional services. It is noted that no evidence is provided as to whether there is currently a shortage of such floorspace in the former Leichhardt LGA.</p> | <p>The Planning Proposal includes 1,200sqm of flexible commercial/retail space. The scale of the retail offering would not be sufficient to impact on the existing retail hierarchy.</p> <p>See point 2.</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 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.</p> <p>The HillPDA 4 November 2016 response asserts the significant of Cordells without providing any independent documentary evidence of the comprehensiveness or reliability of this data source.</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> <p>Cordell Connect is a leading provider of building, construction and infrastructure project information and is widely recognised as such.</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 new draft Central District Plan nominates an Affordable Rental Housing Target</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</p>                                                                                                                                           |

| Issue Number | Issue Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | HiIPDA Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | <p>of 5%-10% for land that would be subject to upzoning. The draft Central District Plan also states that this target "does not preclude councils from negotiating additional affordable housing". The land value uplift model employed in the draft Inner West Council Affordable Housing Policy allows 50% of the land value uplift to be shared by Council for the public benefit of which affordable housing would be an important component. Given the significant value uplift that is generated by brownfield and redevelopment sites such as the subject site if this project were to proceed a target of 15% affordable housing would be appropriate. This needs to be reflected in the planning proposal.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Agreement with Inner West Council.</p> <p>The new draft Central District Plan also specifies that the target will be applied to "applicable land within new urban renewal or greenfield areas (government and private) subject to development feasibility assessed at a precinct scale."</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 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"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul> <p>The HiIPDA 4 November 2016 response seems to be predicated on a concept of "traditional IN2 uses" and relies on unsubstantiated claims.</p> | <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           | 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>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> |

## **Appendix 2 – Urban design**



# 06

# Technical Analysis

## Design Excellence

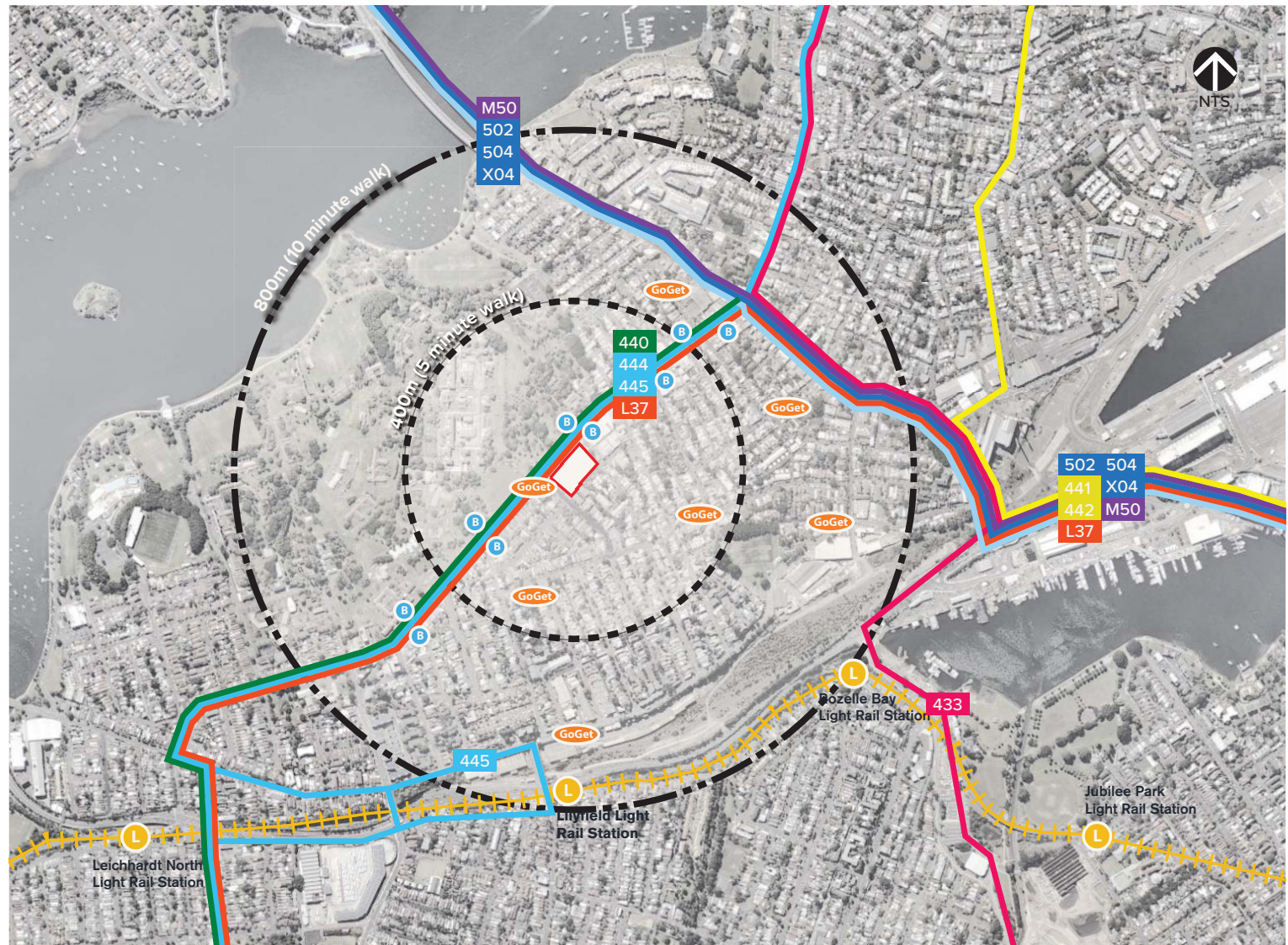
Art Haus has been informed by rigorous technical testing to ensure that the proposal is will be a model for design excellence and be a good neighbour by improving local streetscapes, ensuring solar amenity and complying with the Apartment Design Guide.



# Transport and Accessibility

## Legend

- Site
- 5 minute walk
- 10 minute walk
- Light Rail
- B Bus Stop
- L Light Rail Station
- GoGet GoGet Carshare
- Bus Route



Public Transport / CarShare



# Transport and Accessibility

## Legend

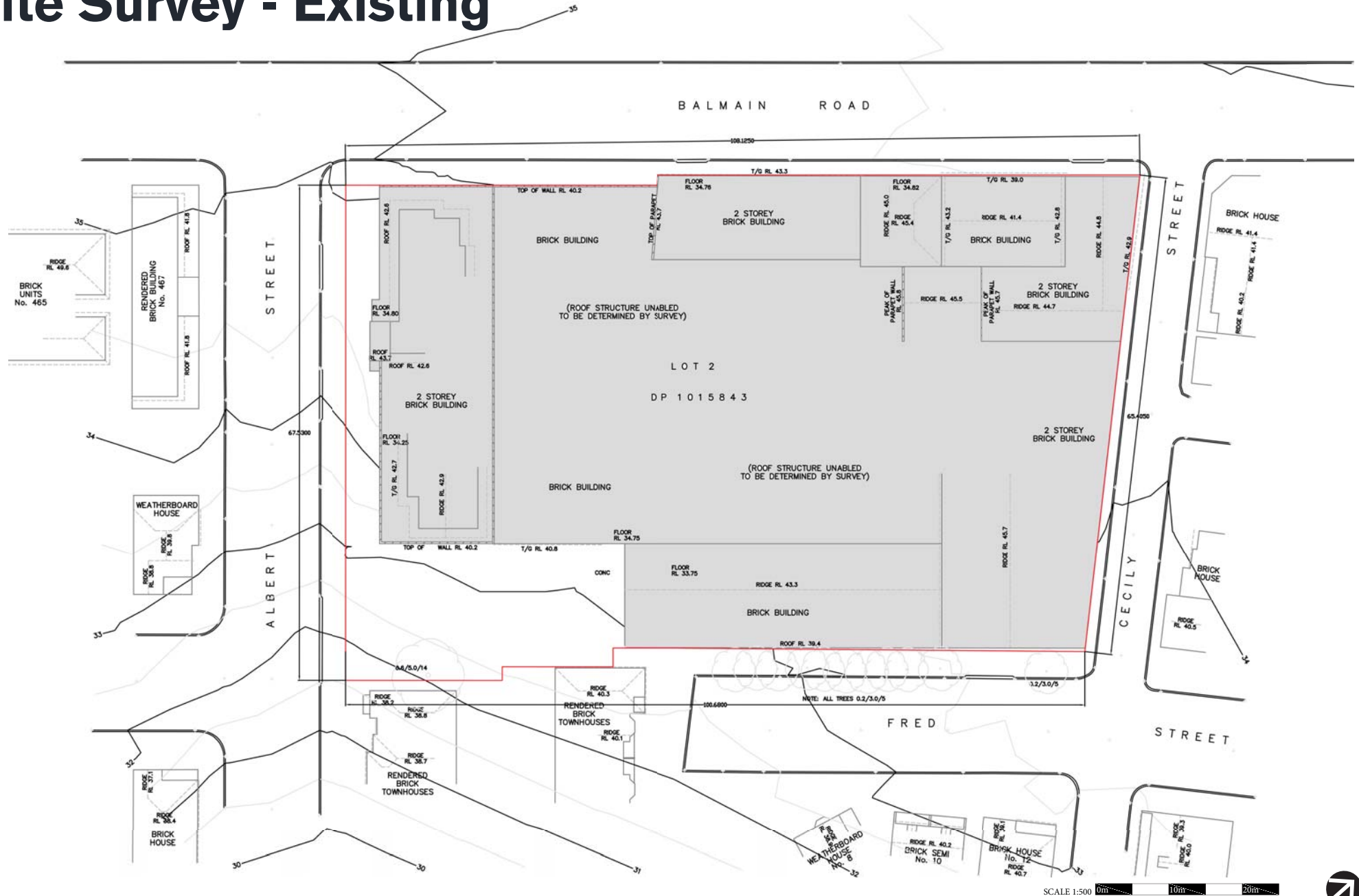
- Site
- 5 minute walk
- 10 minute walk
- RTA Links - On Road
- RTA Links - Shared Path
- Strategic Links - On Road
- Local Links - On Road
- Proposed Cycling Route
- B Bus Stop
- L Light Rail Station
- ↔ ↔ Pedestrian Path  
(750m to Light Rail Station)



Cycle Network and Pedestrian Routes



# Site Survey - Existing





# Site Survey - Proposed Concept

## Key Elements

### Legend

-  - Retained character building elements
-  - 3.30m (1 storey)
-  - 6.30m/7m (2 storeys)
-  - 9.30m/10m (3 storeys)
-  - 12.30m (4 storeys)
-  - 19m (6 storeys)
-  - 22m (7 storeys)
-  - 25m (8 storeys)
-  - 28m (9 storeys)
-  - Widened footpath zone\ Through site link
-  - Plaza
-  - Blank wall/ Detail design solution



SCALE 1:500 0m 10m 20m



### Legend

## Public Realm

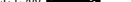
- 1 - Street Trees Planting
- 2 - Plaza
- 3 - Widened Footpath Zone

## Private Realm

- ④ - Communal Courtyards
- ⑤ - Roof Gardens

**- Contour Intervals 0.5m**



SCALE 1:500 



NTS



ROCHE  
GROUP



## Art Haus



# Illustrative Elevations and Cross Sections



Balmain Road Elevation



Fred Street Elevation

# Illustrative Elevations and Cross Sections



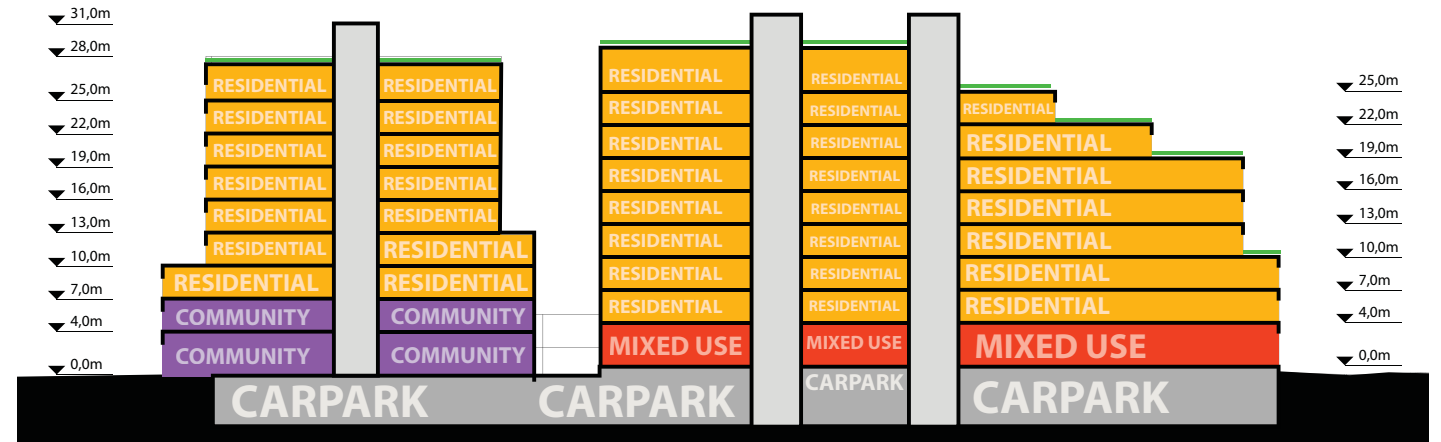
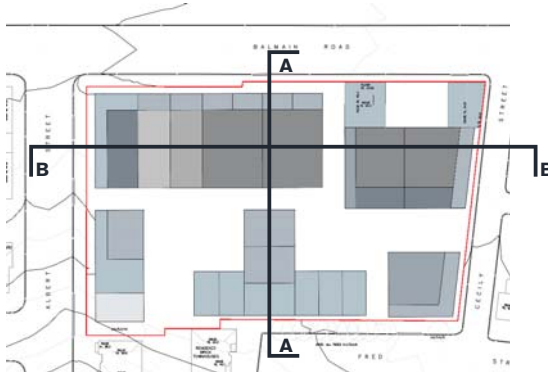
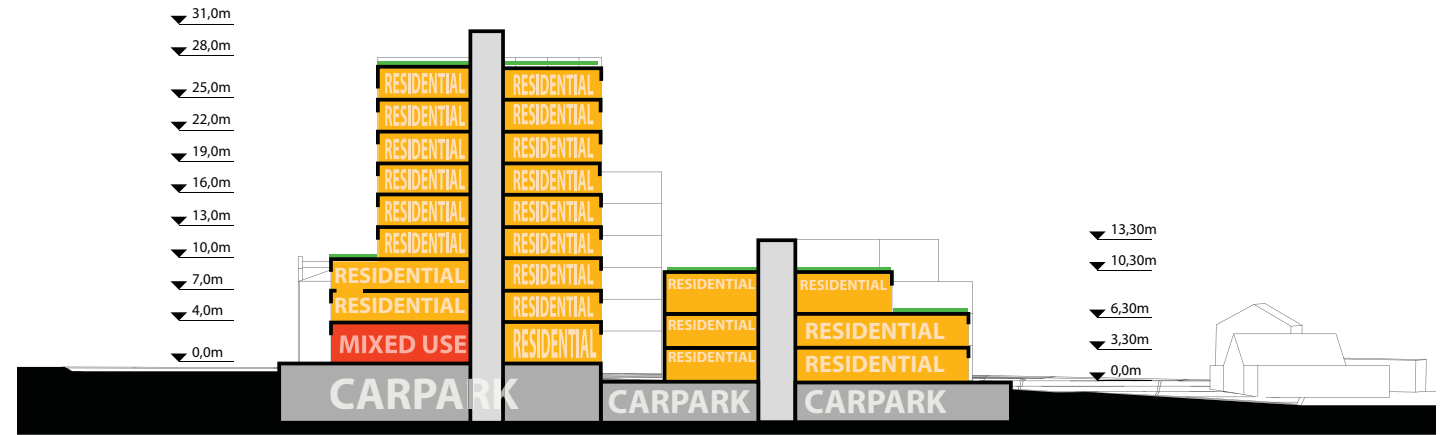
Cecily Street Elevation



Albert Street Elevation

1:500 0m 10m 20m

# Illustrative Elevations and Cross Sections

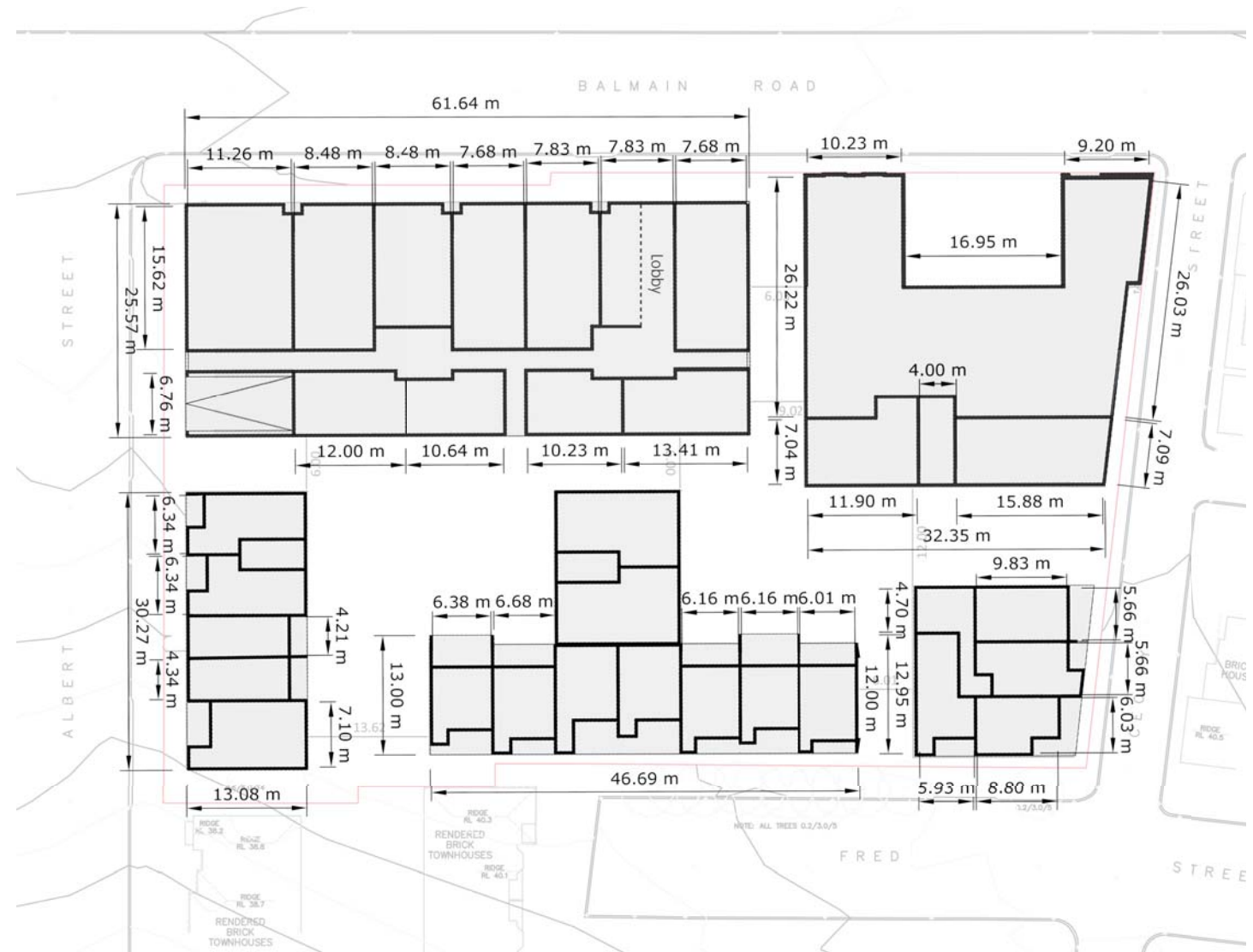


SCALE 1:500 0m 10m 20m





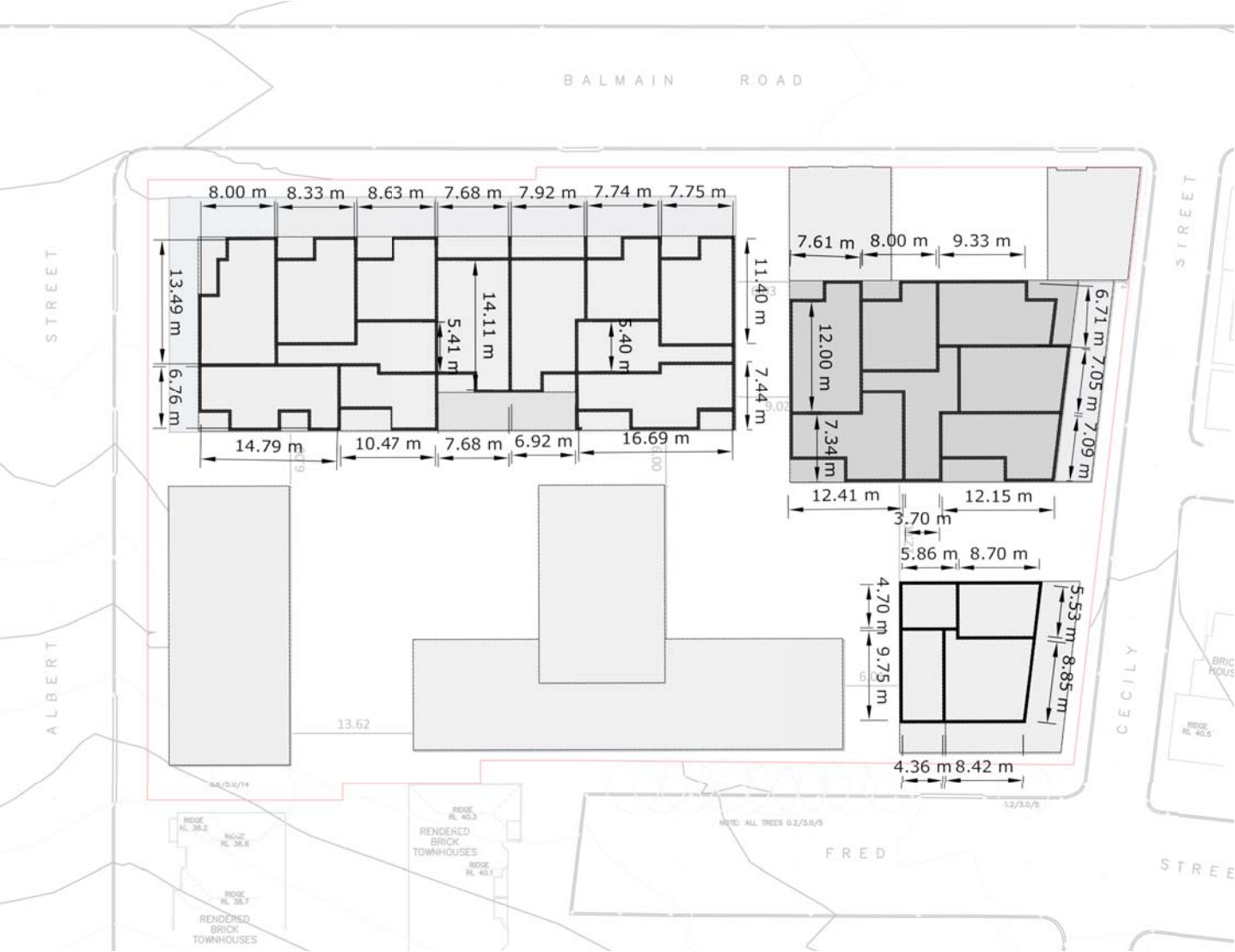
## Ground Floor



| Land Use                                                   | Sqm      |
|------------------------------------------------------------|----------|
| Site Area                                                  | 6,824    |
| Residential GFA                                            | 14,043   |
| Retail/Commercial GFA<br>(includes 400sqm community space) | 1,684    |
| Total GFA                                                  | 15,558   |
| FSR                                                        | 2.28 : 1 |

# Indicative Floor Plan

## Upper Levels



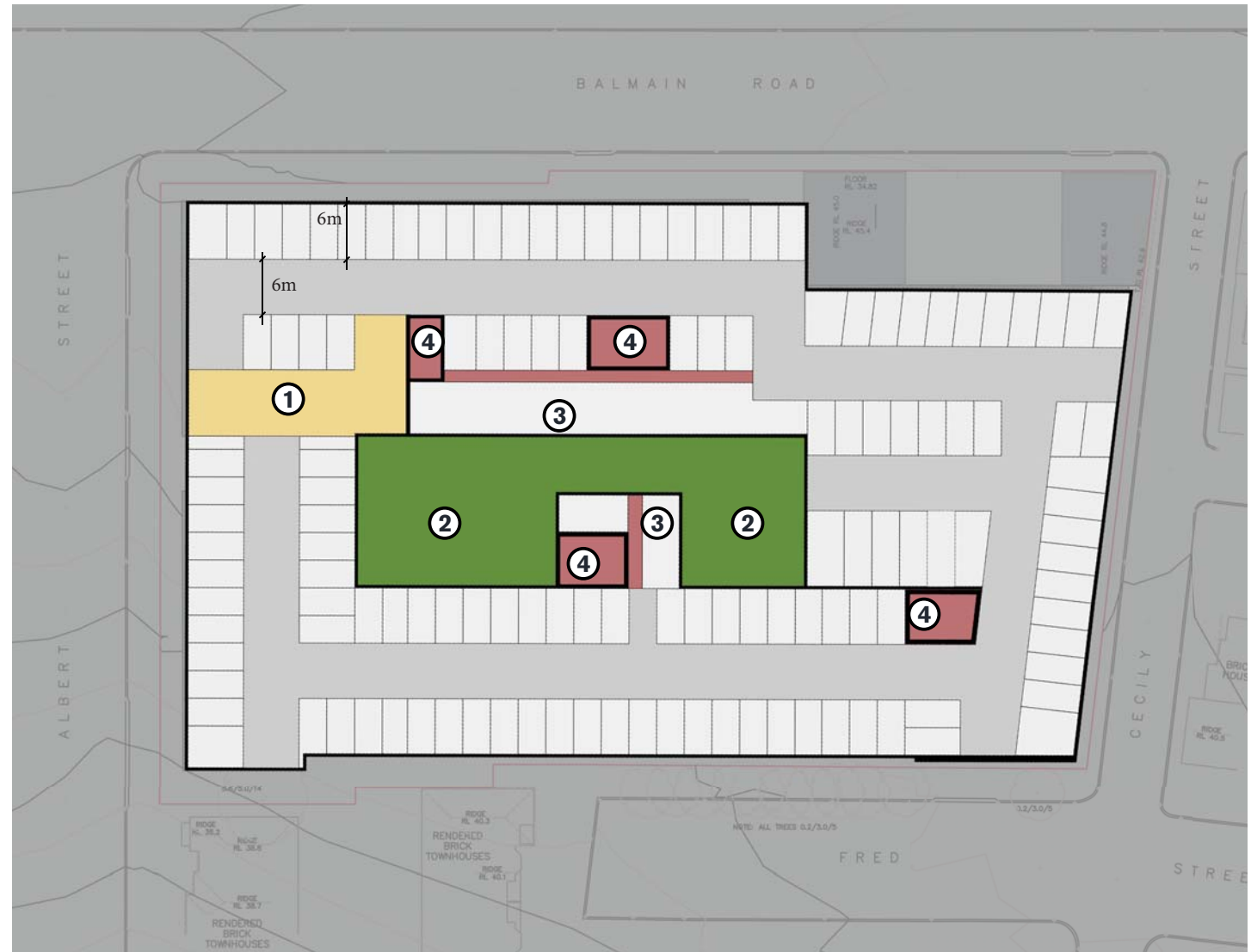
SCALE 1:500 0m 10m 20m

# Indicative Floor Plan

## Carparking

### Legend

- ① Access Ramp
- ② Deep Soil
- ③ Common Areas ( Bike parking, Storage, Bins)
- ④ Lift and Stair Areas



Note: 2 Levels of basement parking is provided on site with approximately 130 bay parking each floor.

# ADG Compliance

At this early stage of the process a preliminary assessment of the design has been undertaken against SEPP 65 to demonstrate compliance along with the Apartment Design Guide 'Rule of Thumb' Assessment.

| Criteria                         | Requirement                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Developing the Controls</b>   |                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>2A Primary Controls</b>       | Demonstrate context responsiveness                                                                                                                                                                   | Compliant – Proposal demonstrates context responsive design process responding to local context and solar amenity to generate building envelopes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>2B Building Envelopes</b>     | Carefully test primary controls                                                                                                                                                                      | Compliant – In preparing the Planning Proposal three alternate concepts were tested. The submitted concept optimises the concept's contribution to the local context, public and commercial feasibility                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>2C Building Height</b>        | Site specific building envelopes                                                                                                                                                                     | Compliant – A variety of building heights have been proposed synthesising solar amenity, solar envelope, adjoining streetscape character and built form, and desire to create a quality pedestrian experience and human scale.                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>2D Floor Space Ratio</b>      | Floor space ratio aligns with desired density and provides opportunity for articulation                                                                                                              | Compliant – The proposed FSR is a by-product of a context responsive design process providing the desired density and significant opportunity for building articulation.                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>2E Building Depth</b>         | 10 – 18m for adequate daylight and natural ventilation. Greater building depths with increased building articulation, perimeter wall depth and where higher ceilings provided (e.g. building reuse). | Compliant – Proposed buildings fronting Alberto St, Cecily St and Fred St have apartment building depths ranging between 10m to 18m. The major apartment building fronting Balmain Rd has a depth of 25m to 1) accommodate deeper adaptable ground floors on the ground and first floor to allow other uses to evolve over time 2) take advantage of the Callan Park amenity whilst optimising the floor plate to facilitate a variety of quality apartment types through the detail design process including 'up and over' apartments 3) to facilitate increased building articulation to create a fine-grain building mass. |
| <b>2G Street Setbacks</b>        | Determine street setback controls relevant to desired streetscape character, including increased                                                                                                     | Compliant – Whilst providing the opportunity to widen footpaths on Balmain Rd, Fre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>2H Side and rear setbacks</b> | NA                                                                                                                                                                                                   | NA - The site forms a complete urban block and therefore does not have any side or rear setbacks                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |



# ADG Compliance

At this early stage of the process a preliminary assessment of the design has been undertaken against SEPP 65 to demonstrate compliance along with the Apartment Design Guide 'Rule of Thumb' Assessment.

| Criteria                          | Requirement                                                                                                                                           | Response                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Sitting the Development</b>    |                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>3A Site analysis</b>           | Site analysis demonstrates decisions have been based on local opportunities and surrounding context                                                   | Compliant – The design sequence diagrams in the Planning Proposal demonstrate decisions have been based on local influences.                                                                                                                                                                                                                                                                                                               |
| <b>3B Orientation</b>             | Buildings respond to streetscape and solar amenity.                                                                                                   | Compliant – Buildings envelopes address the street and also ensure existing solar amenity of surrounding properties is not adversely impacted upon. This is explained further in the Solar Analysis.                                                                                                                                                                                                                                       |
| <b>3C Public Domain Interface</b> | Transition between private and public domain is achieved without compromising safety and security.                                                    | Compliant – The existing buildings on-site largely present blank walls of approximately 9.55m to the adjoining public realm. The blank walls are not conducive to safety. The proposal significantly improves the transition between the private and public realm. Balmain Rd will become a vibrant commercial street at ground level, whilst the other street addresses will be activated by residential dwellings addressing the street. |
| <b>3D Communal Open Space</b>     | Communal open space has a minimum area of 25% of the site area achieving a minimum of 50% sunlight for 2hrs between 9am and 3pm on 21 June.           | Compliant – With a site area of 6,825m <sup>2</sup> the proposal requires 1,706m <sup>2</sup> of communal open space. The proposal provides a total of 4,320m <sup>2</sup> of communal open space including 2,615m <sup>2</sup> at the ground floor and balance as communal roof gardens. The communal open space receives adequate sunlight.                                                                                              |
| <b>3E Deep Soil Zones</b>         | 7 to 15% of site must provide for deep soil with minimum dimension of 6m.                                                                             | Compliant – The proposal provides 650m <sup>2</sup> being 9.5% of the site.                                                                                                                                                                                                                                                                                                                                                                |
| <b>3F Visual Privacy</b>          | Minimum separation between windows and balconies is<br><br>1 to 4 storeys: 3m – 6m<br><br>5 to 8 storeys: 4.5m to 9m<br><br>9 storeys plus: 6m to 12m | Compliant – The proposal provides minimum separation for apartment buildings to facilitate compliance during detail design. Where the 'terrace' style buildings address the proposed Fred St thru-site link, internal planning can prevent overlooking of adjoining dwelling                                                                                                                                                               |
| <b>3G Pedestrian Entries</b>      | Building entries connect to the public realm, are easy to find and large sites provides key pedestrian links.                                         | Compliant – The proposal provides for direct building entries from the adjoining public realm. Further, the proposal provides a pedestrian link connecting Fred St to Alberto St.                                                                                                                                                                                                                                                          |
| <b>3H Vehicle Access</b>          | Vehicle access points are safe and minimise conflict.                                                                                                 | Compliant – Vehicle access is limited to the existing access off Alberto Street.                                                                                                                                                                                                                                                                                                                                                           |



# Development Control Plan

## Key Elements

The proponent is committed to preparing a detailed, site specific Development Control Plan (DCP) for Art Haus as part of the Planning Proposal process.

At this preliminary stage of the process, key DCP controls include:-

### Character Building Elements

- Subject to structural integrity, the intent is to retain the two character 'wing' building elements fronting Balmain Road.

### Creative Hub

- A 'creative hub' with a minimum floor space of 400sqm shall be dedicated to creative uses including artist studios, art gallery and creative space.

### Public Realm

- A publicly accessible plaza (12.5m x 12.5m min) shall be located between the retained character building elements fronting Balmain Road.
- A pedestrian and cycle link connecting Fred Street and Alberto Street shall be located along the southern site boundary (1m min width).
- New buildings fronting Balmain Road, Cecily Road and Alberto Street shall be setback 1.5m min from the existing property boundary to widen the footpaths.

### Built Form

- New built form shall create at least three individual buildings across the site.
- The building envelope fronting Balmain Road and Cecily Street shall be setback 4m min at the fourth storey.
- The building envelope fronting Alberto Street shall be setback 4m at the third storey.

- The building envelope fronting Fred Street shall be no taller than the existing building, being 9.55m.
- Individual buildings shall be designed as a series of vertical elements to create a fine-grain built form to contribute to the character of the area.
- New buildings fronting Balmain Road shall be designed with adaptable ground floors with a floor-to-ceiling height of 4m min.

### Sustainability

- Street trees shall be spaced approximately 10m on centre around the site perimeter to address urban heat island and benefit people walking.
- Green roofs and / or solar panels shall be allocated to 25 per cent minimum of the total roof(s) area.
- Residential buildings greater than 6 stories are to meet enhanced BASIX targets of 40% reduction for energy and 60% for water. All other buildings are to comply with BASIX targets.
- Future development applications shall include a 'green travel' plan giving priority to people walking, cycling and using public transport.
- Buildings shall incorporate smart metering for energy efficiency, light fittings and light sensors.
- A non-potable water reticulation system is to be installed.

### Parking and Access

- Vehicle access / egress to the site shall utilise the existing driveway access off Alberto Street frontage.
- Subject to an agreed 'green travel' plan, parking rates may be discounted from existing rates to reflect proximity to public transport and other measures (e.g. car share).

Upon completing an updated concept in response to community and government feedback, the above DCP controls will be refined. Obviously, it is not the intent of the DCP to replicate relevant ADG controls.

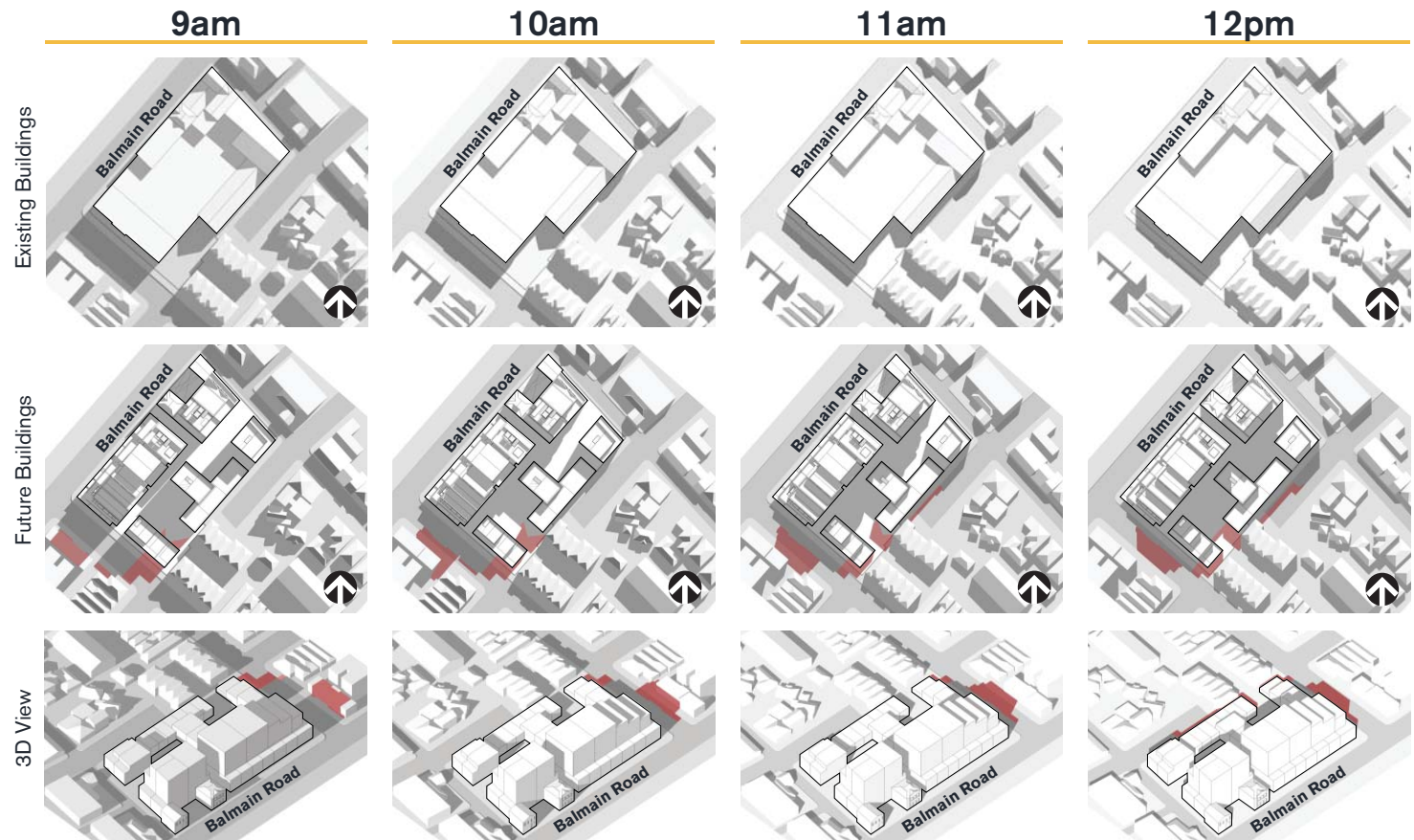
# Solar Analysis

Winter Solstice (21 June)

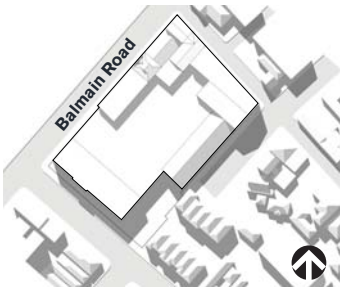
Building envelopes for the site are stepped down towards Alberto Street and Fred Street, allowing sunlight to reach adjoining properties and not be adversely impacted. The shadow diagrams show that there is very little impact on existing private and public open space and it is balanced throughout the day.

Between the hours of 9am and 11am on 21 June, although there is some overshadowing on adjoining properties along Alberto Street, it essentially falls onto blank walls and garages. Shadowing in this area decreases throughout the day.

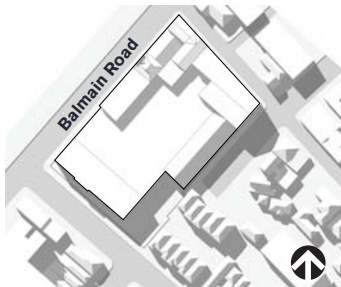
Similarly, properties along Fred Street receive full sunlight during the morning. While there is increased overshadowing in the afternoon, it is located within the road and existing built form, rather than private open spaces.



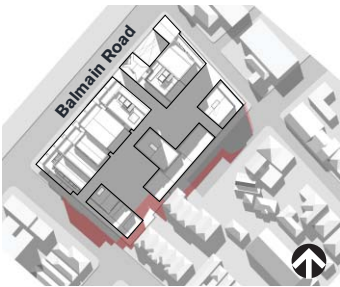
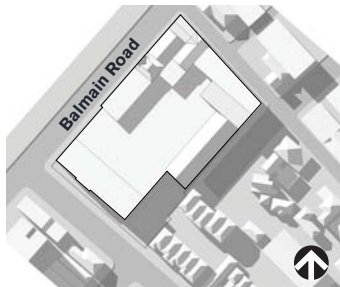
1pm



2pm



3pm

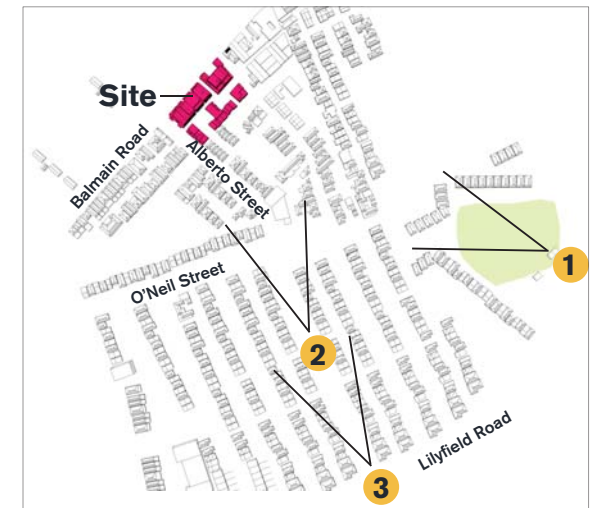




# Visual Assessment

Following advice from Inner West Council, an initial visual assessment of the proposed development has been undertaken.

The following images show the proposal viewed from south of the site, in Easton Park and from Ryan Street. The diagrams clearly show that the proposal has limited visual impact from key locations.



Key







## Appendix 3 – Consideration of relevant strategies

This appendix contains a discussion of the relevance of the following strategies to the proposal.

- Draft Towards our Greater Sydney 2056 (update to a Plan for Growing Sydney 2014).
- Draft Central District Plan
- Leichhardt Community and Cultural Plan 2011 - 2021
- Leichhardt Integrated Transport Plan
- Draft Inner West Council Affordable Housing policy

### ***Draft Towards our Greater Sydney***

In November 2016, the Greater Sydney Commission released a draft update to *A Plan for Growing Sydney 2014*, it proposes an amendment to the previous metropolitan plan and contains the following revised priorities.

| A Productive Sydney                                          | A Liveable Sydney                                                                                | A Sustainable Sydney                                             |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| A growing city<br>A city with smart jobs<br>A 30-minute city | An equitable, polycentric city<br>A city of housing choice and diversity<br>A collaborative city | A city in its landscape<br>An efficient city<br>A resilient city |

**Figure 1 - Towards Our Greater Sydney Priorities**

The amendment proposes a large increase in jobs and housing, 817 000 jobs and 725 000 new homes. In housing terms this is at least a 9% increase in homes beyond that sought by *A Plan for Growing Sydney in 2014*. The draft states that the need for additional capacity is greatest in the North and Central Districts,

The objectives relating to smart jobs and a 30-minute City are particularly relevant to this proposal as it will supply a greater density of employment and housing matched to the needs of the local population than presently exists on the current underutilized site.

The proposal aims to deliver a supply of medium density and subsidized affordable housing that will directly contribute to the housing choice and diversity of the local area.

### ***Draft Central District Plan***

The Draft Central District Plan was put on public exhibition in November 2016 until the end of March 2017. While the draft plan makes no specific reference to housing and employment targets for Lilyfield, it does reinforce the role of housing and employment in local and strategic centres. It is important to note that the plan is still in draft form and subject to a process of consultation.

Within the current hierarchy of NSW strategic plans, the District Plans are intended to give effect to the aims and objectives of the metropolitan strategy *A Plan for Growing Sydney 2014*). The planning proposal and the Hill PDA economic assessment contains a comprehensive assessment of the proposals ability to deliver to deliver a supply of housing



and greater employment in an area well serviced by transport and community infrastructure therefore satisfying the consolidated objectives of this plan.

The draft Central District Plan reiterates the importance of three main principles from *A Plan for Growing Sydney* and states that these underpin its proposed priorities. These principles are

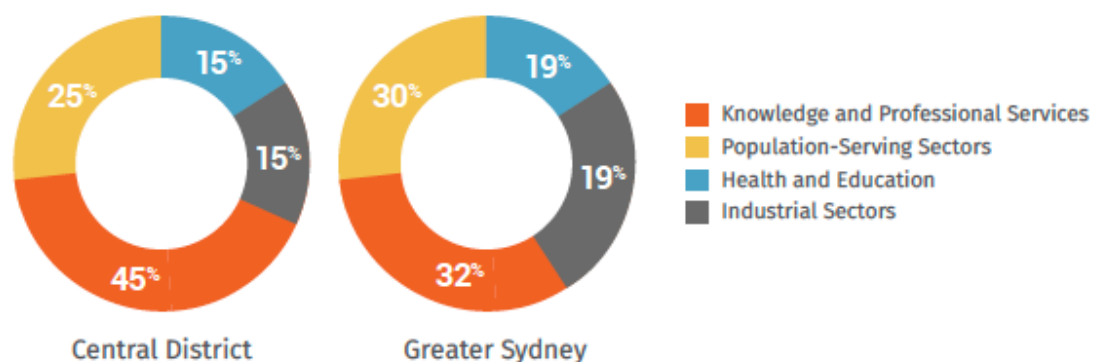
1. *Principle 1: Increasing housing choice around all centres through urban renewal in established areas*
2. *Principle 2: Stronger economic development in strategic centres and transport gateways*
3. *Principle 3: Connecting centres with a networked transport system*

The first objective is of particular relevance to this proposal as it increases housing supply, choice and employment in an established area. It also builds on the cultural and creative richness of the area by providing space for a continuation and enhancement of cultural and creative activities on the site.

The draft District plan contains further evidence which can be used to determine the proposals fit with the objectives of *A Plan for Growing Sydney 2014* objectives. The proposal is designed to provide a supply of employment that better matches the demographics of the surrounding area. The Draft District Plan contains the following information;

*In the 20 years between 1996 and 2016, the growth of the District's jobs was largely in knowledge and professional services (67% growth), health and education (56%) and population-serving (46%) sectors. A modest decline occurred in industrial sector jobs. (Pg37)*

Figure 3-2: Employment profile by sector in Central District vs Greater Sydney (2016)



Source: Transport Performance & Analytics (TPA) (formerly known as Bureau of Transport Statistics), Transport for NSW, Greater Sydney Employment Forecasts, 2011 to 2041 (2016 Release), NSW Government, Sydney

## Figure 2 - Draft Central District Plan Employment Profile

The planning proposal will provide employment space that is a better fit with the employment needs of the current demographics of the area, such as spaces suited to small professional firms, start-ups and creative industries. The greater density of employment of a kind matched to the local area, will provide more jobs closer to where people live.

The draft Central District Plan contains a number of relevant priorities to the proposal, these are discussed below;

## **Relevant Priorities**

*The Draft Central district plan groups its priorities under the categories of productivity, liveability and sustainability.*

### **Productivity**

The overarching productivity priorities are:

- Driving the growth of the Eastern City
- Enhancing the Eastern City's role as a global leader
- Planning for job target ranges for strategic and district centres
- Growing economic activity in centres
- Improving 30-minute access to jobs and services
- Managing Sydney's trade gateways

When measured against the priorities of the draft plan the proposal will deliver significant employment and housing growth on a site which has remained stagnant for many years. The proposal aims to match employment to the demographics of the surrounding area and provide a diversity of housing in close proximity to local and CBD jobs in accordance with the ambition of a 30-minute city.

The draft plan expresses concern about the erosion of employment and urban services land in the Central District. It urges Councils to take a precautionary approach and proposes that proposals which seek to rezone industrial land should demonstrate that there is a net community benefit and this should take into account the economic, social and environmental considerations of the change of use.

Hill PDA have completed an economic assessment of the impacts of the change of use and this along with a further response to the issues raised by Council and the draft Central District Plan are attached to the planning proposal.

In applying the above net community benefit considerations to the current proposal it is clear that the outcome for the site will remain unchanged if the proposal does not proceed. The site is an isolated pocket of industrial land landlocked by very fragmented residential land with quite narrow streets. Clearly the current built form is not conducive to an intensified employment use and the Hill PDA analysis shows that none of the current uses on the site could be characterised as providing urban services for the surrounding area. the Hill PDA economic analysis shows that there will be a significant increase in employment on the site and that there is a substantial economic benefit to the redevelopment of the site.

From a social perspective, the site currently contributes relatively little in the way of employment and provides for only two dwellings. There is currently provision for artist space on the site however this space is in poor condition. Redevelopment will allow for a range and diversity of housing types, new community and creative space and a kind of employment space that matches the local need.

Regarding the environmental considerations of the proposal there will be a significant decrease in heavy vehicle movements in the surrounding area, there are no significant additional impacts from overshadowing and the opportunity for local employment and active transport options for future residents will have a positive environmental impact.

### **Liveability**

The overarching liveability priorities are:

- Improving housing choice

- Improving housing diversity and affordability
- Coordinating and monitoring housing outcomes and demographic trends
- Creating great places
- Fostering cohesive communities
- Responding to people's need for services

While medium density housing exists in the local area the draft Plan states that the Northern and Central Districts are in greatest need for increased housing supply and diversity. The proposal will provide approximately 170 new dwellings of which 5% are proposed to be affordable rental accommodation. The proposed dwellings, employment and community space is located adjacent to Callan Park, good services and transport and will provide a highly desirable place to live and work.

The proposal creates opportunities for living and working either onsite or in close proximity. It also proposes a significant community space which should generate synergies with the office component of the proposal given the presence of creative industries in the area.

### **Sustainability**

The overarching sustainability priorities are:

- Enhancing the Central District in its landscape
- Protecting the District's waterways
- Managing coastal landscapes
- Protecting and enhancing biodiversity
- Delivering Sydney's Green Grid
- Creating an efficient Central District
- Planning for a resilient Central District

Proximity of employment, housing and recreation both on the site and in a location with high quality walking cycling and public transport connections adds to the efficiency of the urban area and reduces pressure on greenfield and less suitable locations.

## Leichhardt Community and Cultural Plan 2011 - 2021

The Plan identifies five Strategic Objectives for social inclusion, equity, access, creative expression, cultural engagement and community wellbeing:

1. Connecting people to each other
2. Connecting people to place
3. Developing community strengths and capabilities
4. Enlivening the arts and cultural life
5. Promoting health and wellbeing.

The table below contains an assessment of the proposal against the five strategic objectives of the *Leichhardt Community and Cultural Plan 2011 – 2021*.

| Objective                                          | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Connecting people to each other                 | <p>The provision of a supply of employment closely matched to the demographics of the surrounding area enables more people to work locally and create stronger connections with the local community and spend less time commuting.</p> <p>The addition of a significant arts space will foster connections with the local creative community as well as allowing for potential connections with employment uses onsite and in the surrounding area. The design of the proposal allows for the possibility of live/work arrangements.</p>    |
| 2. Connecting people to place                      | <p>The preservation of the older building forms of the site provides a historical built form reference to the history and previous use of the area. This will have the effect of connecting the future community to the area.</p> <p>The ability to live and work in the locality is probably the strongest element of connection to place, reductions in travel time and travel by foot or cycle will allow future workers and residents to fully appreciate the desirable local environment.</p>                                          |
| 3. Developing community strengths and capabilities | <p>The supply of 1,200 square metres of new adaptable floor space will generate approximately 66 local jobs, this kind of space is likely to be attractive to professional suites, start-up businesses and creative industries, particularly with the planned artist facilities.</p> <p>The proposed affordable housing will ameliorate housing stress experienced in the local area and enable some members of the community to remain in the local area who would have otherwise been forced to relocate due to rising housing costs.</p> |
| 4. Enlivening the arts and cultural life           | <p>The provision of 400 square metres of space dedicated to creative uses including artist studios, art</p>                                                                                                                                                                                                                                                                                                                                                                                                                                 |

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | gallery and creative space is directly consistent with this objective.                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5. Promoting health and wellbeing. | The location of housing and employment in an area that has good access to public transport and that encourages working in the local area will increase work and recreational travel by active means and reduce reliance on car based trips. This has been shown to have positive health benefits. Additionally the sites close proximity to a number of existing and planned areas of high quality open space creates an environment that promotes health and well being. |

The proposal will replace an under utilised site which is home to a mix of uses not belonging to any particular industry cluster and not predominantly industrial in nature.

The current use of the site has little role in servicing the local area, however the proposal offers to replace these with local housing, employment, affordable housing and an arts/cultural facility. As such the proposal is directly consistent with the objectives of the *Leichhardt Community and Cultural Plan 2011 – 2021*.

### **Leichhardt Integrated Transport Plan**

The Leichhardt Integrated Transport Plan states “Approximately 18% of Leichhardt LGA residents work within the LGA and a total of 63% work either within the Leichhardt LGA or in one of the adjoining LGAs”. This relatively high level of containment is evidence of the areas high level of transport accessibility and the significant employment options in the local area. As stated in the planning proposal Lilyfield is extremely close to the Sydney CBD and the new planned employment precinct of White Bay as well as significant sources of local employment.

The transport plan contains nine objectives which are shown below and followed by a table providing an assessment of the proposal against these objectives.

1. Improve accessibility within and through the LGA.
2. Create a legible, direct and safe pedestrian and cycling environment.
3. Encourage public transport use.
4. Provide a safe and efficient road network for all road users.
5. Provide appropriate levels of parking.
6. Facilitate integration of land use, transport and community & cultural activities.
7. Provide convenience for users of Leichhardt.
8. Promote health and well being.
9. Improve environmental conditions.

| <b>Objective</b>                                     | <b>Assessment</b>                                                                                                                                                                                                               |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Improve accessibility within and through the LGA. | The provision of a supply of employment closely matched to the demographics of the surrounding area enables more people to work locally and create stronger connections with the local community and spend less time commuting. |



|                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2. Create a legible, direct and safe pedestrian and cycling environment.              | A new Fred St pedestrian connection is proposed and it is also proposed to incorporate widened footpaths to enhance neighbourhood amenity and pedestrian circulation around the site                                                                                                                                                                                                                                                     |
| 3. Encourage public transport use.                                                    | The proposal will result in the placement of significant employment and housing in close proximity to high quality bus, light rail and active transport options.                                                                                                                                                                                                                                                                         |
| 4. Provide a safe and efficient road network for all road users.                      | <p>In providing for an improved pedestrian environment and minimising vehicle movements through the residential area the proposal meets this objective.</p> <p>The report by Colston Budd Rogers &amp; Kafes the future development would have minimal impact on the surrounding area and adequate transport infrastructure exists to cater for the future development.</p>                                                              |
| 5. Provide appropriate levels of parking.                                             | <p>The proposal is capable of complying with the parking provisions in the Leichhardt DCP. This will be further assessed at development application stage.</p> <p>Vehicular access to the development is proposed to be provided from Alberto Street. The existing driveways to the site from Balmain Road, and two of the existing site driveways from Alberto Street, will be removed. This will improve parking in these streets.</p> |
| 6. Facilitate integration of land use, transport and community & cultural activities. | The proposal integrates employment, housing, and arts/community space all in close proximity to the established centre and in easy walking distance to high quality public transport.                                                                                                                                                                                                                                                    |
| 7. Provide convenience for users of Leichhardt.                                       | Employment space matched to the demographics of the local area will allow for more people to live and work locally which has significant quality of life and convenience advantages. It is also a more sustainable travel option.                                                                                                                                                                                                        |
| 8. Promote health and well being.                                                     | <p>The proposal has been designed to provide opportunities for live/work onsite and encourage local employment for local people. This should result in greater use of active transport options such as walking and cycling.</p> <p>The improvement and provision of new pedestrian footpaths and provision of a pedestrian link connecting Fred Street to Alberto Street will further encourage walking and cycling.</p>                 |
| 9. Improve environmental conditions.                                                  | The current operations of the site involve larger delivery vehicles, at grade above ground parking and present a poor interface to the adjoining residential area.                                                                                                                                                                                                                                                                       |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>Vehicular access to the development is proposed to be provided from Alberto Street. The existing driveways to the site from Balmain Road, and two of the existing site driveways from Alberto Street, will be removed.</p> <p>The current proposal has been designed to improve this interface, minimise vehicle movements through the residential area and will significantly reduce if not eliminate larger vehicle movements in and around the residential area.</p> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

### **Draft Inner West Council Affordable Housing policy**

Released in November 2016 for public comment the Draft Inner West Affordable Housing Policy was formulated in response to decreased housing affordability in the LGA and an increase in the number of households experiencing housing stress.

*The draft strategy states that “redevelopment is most likely to take place in older industrial areas and areas of low quality commercial development. The strategy suggests that a levy of 15% is likely to be sustainable for developments of six stories and above in such areas, particularly given the order of accuracy of the modelling and the relatively conservative assumptions used”.*

The planning proposal will allow the redevelopment of an older isolated pocket of former industrial land to be developed to meet the aims of the strategy.

The draft Central District Plan suggest that affordable housing of up to 10% would be appropriate and an analysis of existing affordable housing schemes in Sydney shows that on the ground outcomes of between 3% and 4% have been delivered.

The current planning proposal is proposing that rather than deliver the entire public benefit in the form of affordable housing a balance of community/cultural facilities, employment outcomes and affordable housing is more appropriate given the state and local strategic aims. The proposed 5% provision of affordable housing will deliver a best practice example when measured against existing schemes, while also delivering on a range of other objectives.

Provision of artist spaces, provision of commercial space and 5% affordable housing represents a balanced approach to the delivery of a public benefit to the local area.