

Wednesday, June 21, 2017

Mr Simon Manoski Group Manager Strategic Planning Inner West Council 7-15 Wetherill Street Leichhardt NSW 2040

Amended Planning Proposal for 469- 483 Balmain Road, Lilyfield

Dear Simon,

I write in response to your letter dated 6 June 2017 to Wes van der Gardner of Roche Group. Roche Group has amended its proposal to be consistent with the key principles outlined in your letter. The key metrics of the revised proposal are listed in the table below.

Zoning	IN2 Light Industrial with residential accommodation as an additional permitted use
Height	6 Storeys
Floor Space Ratio	2.54:1
Minimum Non-residential /employment floor space	6,000sqm

The issues raised in your letter are addressed in further detail below and supported by a revised urban design concept, a revised traffic assessment and a revised economic impact assessment.

Additionally, the revised concept retains the key principles espoused in the original planning proposal (pg. 11) which were developed with the Resident Reference Group established by Leichardt Council in 2007.

Industrial Land and Floor Space

Roberts Day has prepared a Revised Concept (Attachment 1), that includes the retention of 6,000 square metres of employment floor space on the site, as requested by Inner West Council. A site specific local provision could be used to require the minimum provision of 6,000 square metres of non-residential floor space on site. Because of the retention of the existing employment floor space the revised FSR is 2.54:1.

Consistent with Council's comments, the IN2 Light Industrial zoning is proposed to be retained on the basis that residential accommodation will be added to Schedule 1 of the *Leichhardt Local Environmental Plan 2013* as an additional permitted use to accord with the Revised Concept.

Height and Building Envelopes

The Revised Concept proposes a maximum building height of 6 storeys. It demonstrates the efficacy of a vertically integrated development in achieving a flexible, viable employment space at ground floor level with residential dwellings above while minimising land use conflicts or impacts both within the site and on the surrounding uses. The flexible employment space with a generous floor to ceiling height of 5.2 metres on the ground floor (to match the existing floor to ceiling heights within the retained character buildings) will be able to accommodate a range of employment uses.

For this reason, Councils recommendation of a maximum six storey building height rather than a set height in metres is preferable to allow for design excellence and flexible spaces.

The vertical integration of uses (vs horizontal separation) allows the greatest flexibility to the floor space provided, maximises exposure to street frontages for non-residential uses as well as integrates with the retained character buildings. Employment uses above street level would be less feasible and much harder to accommodate.

The Revised Concept shows that ADG compliance can be achieved and although the building currently presents as a blank 3+ storey wall to Fred and Alberto St the Revised Concept shows the majority of this frontage incorporating a two storey street wall height.

Setbacks

The Revised Concept includes provision for generous pedestrian footpaths and a two to three storey transition to the surrounding residential areas. It is recommended that a new local provision be adopted similar to the Terry Street Site, which requires a transition to surrounding areas to resolved at DA stage.

New Local Provision

Consistent with the above, the following local provision is suggested for the site:

- 6.1x Development on certain land at Lilyfield
- (1) This clause applies to Lot 2 DP 101583
- (2) Despite any other provision of this Plan, development consent may be granted to a single development application for development on land to which this clause applies that is both of the following:
- (a) a proposal to develop the 469-483 Balmain Rd site in its entirety, and
- (b) a proposal for development with a maximum floor space ratio of 2.54:1, inclusive of a component of residential accommodation.
- (3) Development consent must not be granted under subclause (2) unless the consent authority is satisfied that:
- (a) a high standard of architectural and urban design appropriate to the building type and location will be achieved, with articulated height and massing providing an appropriate transition to the existing streetscape, and
- (b) the total gross floor area of the part of the development that is used for non-residential or employment purposes is a minimum of 6,000 square metres, and
- (c) the development will not exceed 6 storeys in height, and
- (d) the development will cause no adverse overshadowing impact of neighbouring properties, and
- (e) the development will provide and facilitate pedestrian access connecting Fred Street to Alberto Street, and
- (f) the development will incorporate environmentally sustainable design principles, and
- (g) the development will include the necessary design and acoustic measures to ensure that light industries within the development, as well as any existing industrial uses on land surrounding the development, do not have a significant adverse impact on the amenity of future residents of the development.

Information to be updated

The following attachments are also submitted in response to Council's request:

 A revised Economic Impact Assessment (Attachment 2), which addresses the revised strategic direction from Council specifically the retention of 6,000 square metres of employment space. This includes a consideration of Action 1.9.2 of A Plan for Growing Sydney and an assessment of the Proposal against the Industrial Lands Strategic Assessment Checklist. The revised Economic Impact Assessment predicts that there will be a fivefold increase in employment on site from the existing 26 jobs to approximately 131 jobs on site.

- A revised Traffic Assessment (Attachment 3), which includes consideration of the traffic impacts of the revised proposals and addresses Council's further information request received by email on 8 June 2017 relating to traffic issues and access arrangements.
- A revised VPA offer (Attachment 4) for an increased amount of affordable housing of 5% of the permissible residential floor space on the site consistent with the Draft Central District Plan and public domain improvements in combination with the other public benefits of the proposal such as sustainability initiatives, retention of artist studios and the protection of the significant heritage character buildings is seen to be an appropriate outcome for the site.

It is considered that the information contained in this submission, its attachments and the original Planning Proposal are sufficient to satisfy the requirements of section 55 of the *Environmental Planning and Assessment Act* 1979. The proposal as lodged was anticipated to generate a greater amount of local employment than presently existing onsite. By retaining the IN2 Light Industrial Zone and increasing the proposed employment floor space to 6,000 square metres, the flexibility and amount of employment outcome is increased significantly.

Should you wish to discuss or require any further clarification please do not hesitate to contact me on the number below.

Regards,

Michael File

Director

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