



INNER WEST COUNCIL

Contact: Leah Chiswick
Phone: 9367 5232

17 October 2018

Platino Properties
Att: Richard McLachlan
PO Box 1839
Neutral Bay NSW 2089
Sent by email to richard@platino.com.au

Dear Mr McLachlan,

RE: Pre-Planning Proposal – 67-75 Lords Road, Leichhardt

I refer to your application of 9 August 2018 for formal pre-planning proposal advice in relation to 67-75 Lords Road, Leichhardt (the site). This advice relates to the following amendments to *Leichhardt Local Environmental Plan 2013* (LLEP 2013):

- Rezone the site from IN2 Light Industrial to R3 Medium Density Residential
- Modify the FSR for the site from 1:1 to 2.4:1
- Introduce a maximum height of buildings of 30m
- Introduce a site-specific provision:
 - allowing a range of additional non-residential uses including recreation facility (indoor), office premises, business premises, light industry, industrial retail outlet, and restaurant or café;
 - requiring a minimum of 3,000 sqm of non-residential uses to be provided on the site; and
 - enabling a multi-use facility associated with Lambert Park to be provided as an FSR bonus.

Council's response (Attachment 1) outlines a number of issues with the proposal, including:

- loss of industrial land;
- workability of a mixed use development;
- prematurity of a planning proposal for the site and the requirements of the Out of Sequence Checklist, contained within the PRCUTS Implementation Plan 2016-2023, not being satisfied;
- inadequate justification for the planning controls sought;
- inconsistency with the Inner West Affordable Housing Policy; and
- lack of contribution to open space and public domain.

Furthermore, it identifies additional information that would be required if a planning proposal were to be pursued.

Council is currently undertaking a range of broader strategic planning work and studies including, but not limited to:

- Local Housing Strategy
- Local Strategic Planning Statement

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- Employment Lands Review
- Local Infrastructure Contributions Plan
- Integrated Transport Plan
- Comprehensive IWC LEP and DCP
- Affordable Housing Contribution Scheme
- PRCUTS precinct wide traffic modelling

This work will provide a comprehensive evidence base to inform the future strategic planning framework for the LGA, including land uses, infrastructure, public domain works, urban design and place making, community/social benefits, economic development and appropriate distribution of development uplift. A planning proposal for the subject site would be premature in relation to the completion of this broader strategic planning work, in particular the Local Housing Strategy and Employment Lands Review. The site and its future uses should be planned holistically in the context the revitalisation of Parramatta Road Corridor rather than in an ad hoc manner.

Notwithstanding, if a planning proposal is to be lodged, it should adequately address all matters raised in this correspondence. Prior to Council taking receipt of a planning proposal, a thorough review of the documentation being submitted would be undertaken. This is to ensure that an adequate level of information is being provided. This requires a meeting to be scheduled with a member of Council's Planning Operations team.

It should be noted that this response constitutes preliminary feedback and further issues may be identified during the assessment of any detailed planning proposal.

Should you have any enquiries, please contact Council's Executive Strategic Planner, Leah Chiswick on 9392 5232 (Mon, Wed and Thurs) or leah.chiswick@innerwest.nsw.gov.au.

Yours faithfully,

Colette Goodwin
Acting Planning Operations Manager

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**Attachment 1 – Pre-Planning Proposal Assessment
67-75 Lords Road, Leichhardt**

Pre-Planning Proposal Concept

The pre-planning proposal presents a scheme for the redevelopment of the site for the purpose of a mixed use development comprising:

- 22,482 sqm of residential floor space delivering approximately 235 dwellings
- 3,000 sqm of non-residential floor space on the ground floor
- Five buildings located around the perimeter of the site ranging from three to nine storeys with a maximum height of 30 metres
- Open space of approximately 1,650sqm
- A public through site link and a secondary GreenWay connection to the Marion light rail stop
- 35 affordable rental dwellings

There are a number of fundamental concerns with the proposal as currently presented. These issues are outlined below.

1. Concerns with the Pre-Planning Proposal

Loss of Industrial Land

The planning proposal needs to demonstrate consideration of the Industrial Lands Study (2014) and Leichhardt Industrial Precinct Planning (2016) both undertaken by SGS Economics and Planning.

The recommendations of the Leichhardt Industrial Precinct Planning included two options:

1. Business as usual approach
2. Policy change for key precincts

Under both options, the recommendation for the Lords Road precinct was the same, to retain the IN2 zoning and continue to protect the precinct from rezoning. The rationale for the recommendations can be summarised as follows:

- The Industrial Lands Study (2014) identified a shortage of industrial floorspace in the LGA by 2036;
- While it will not increase industrial floorspace to address the identified shortage, retention and active protection of all IN2 (Light Industrial) zoned land is the best way to ensure that there is no continual erosion of remaining stock;
- The risks associated with introducing additional uses significantly outweigh the benefits. Integrating land use types would likely generate conflicts, significantly limiting the ongoing function of the precincts concerned; and
- Introducing residential to a site could potentially result in this becoming the dominant land use, with industrial uses being pushed out.

In light of the above, concern is raised regarding the proposed loss of between 8,000sqm and 10,000sqm of industrial floorspace on the site. The loss of this floorspace, and the introduction of residential development to the site, are fundamental issues with the proposal going forward.

Furthermore, Council is currently undertaking an Employment Lands Review which will inform the preparation of an Inner West LEP. The land use future of this site should be informed by this process.

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The lodgement of a planning proposal for the site in advance of the completion of this work would be premature.

Economic Impact

The Draft Community & Stakeholder Engagement Consultation Report outlines that during discussions with the Department of Planning and Environment (DPE), following the decision not to support the previous planning proposal, they identified “the need to provide affordable commercial/industrial space and employment opportunities in the local area”. In addition, the consultation undertaken to date identifies existing tenants who serve the local population and hence need to remain in the area but are having difficulty finding an alternative space. The planning proposal should explore how these uses could remain on the site.

The EIA states that the proposal is addressing a market gap, responding to a “distinctly modest growth of employment in knowledge-intensive industries” by providing shared work space (comprising shared desks, workshops and studio space). The report however, does not consider how the existing tenants could be accommodated within a new development on the site, nor the impact of the loss of these uses. The net economic activity considers the proposal against the residential scenario (base case), rather than the existing situation, to argue a net increase in economic activity. There is no comparison with the existing situation in terms of jobs, both direct and flow-on.

Every effort should be made to encourage the provision of large, versatile, unembellished and affordable non-residential spaces on the site, which could help support and grow the creative industries which this area and the Inner West are already known for.

A preliminary review of the EIA has raised queries relating to the selected ‘catchment area’ and ‘analysis area’. Justification for using these areas as the basis for analysis is requested.

A peer review of the EIA, considering the methodology, analysis and assumptions, will be sought when the planning proposal is lodged.

Functionality of mixed-use development

A planning proposal would need to demonstrate the workability of the proposed non-residential space for light industrial/local service uses and how these uses could co-exist with residential development. Consideration should be given to floorspace, floor to ceiling heights, access, parking and servicing requirements and compatibility with the proposed residential component, particularly in terms of amenity. More information is also required in support of the purported flexibility and adaptability of the non-residential space.

There is no indication that an alternative scheme which separates the uses horizontally (in different buildings) has been considered.

Prematurity of a Planning Proposal

As noted above, a planning proposal for the site is considered premature in advance of the completion of broader strategic planning work, which has commenced. Furthermore, consideration against the criteria of the Out of Sequence Checklist (the Checklist) of the PRCUTS Implementation Plan 2016-2023 highlights a number of deficiencies.

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Criteria 1

The planning proposal can demonstrate significant delivery or contribution towards the Strategy's Corridor wide and Precinct specific vision	The submission considers the proposal against the Strategy's Corridor-wide and Precinct Visions and the Strategy's seven land use and transport planning principles. While the adopted approach has merit, Council officers have yet to determine if the proposal as presented will achieve 'significant delivery or contribution' towards the identified visions and satisfy the Strategy's principles and Strategic Actions.
The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfills the relevant Strategic Actions for each Principle	The purported economic, community and environmental benefits have yet to be verified and their significance ascertained.
The planning proposal can demonstrate significant net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located	The proposal includes provision of multi-purpose 'community floorspace' of 1,000sqm and notes that anticipated uses include APIA Leichhardt Football Club (500sqm); fitness studio/mixed martial arts (250sqm); dance/music/arts studio (200sqm); and café/takeaway food (50sqm). It is unclear how this proposed floorspace responds to an identified community need.
The planning proposal is consistent with the recommended land uses, heights, densities, open space, active transport and built form plans for the relevant Precinct or Frame Area	<p>The pre-planning proposal states that it is consistent with the relevant provisions for the Taverners Hill Precinct as outlined in the PRCUTS – Planning and Design Guidelines.</p> <p>The recommended planning controls for the site are incongruous in that the building height and density do not align with the described land use.</p> <p>In describing the recommended land use zones for the Taverners Hill Precinct, the Guidelines state that (with the exception of the western Frame Area, both sides of Parramatta Road east of Hawthorne Canal, and the eastern side of Tebbutt Street) "low density residential uses are recommended" with an R3 Medium Density zone shown "in recognition of the need to permit town houses and terrace type dwellings given the good proximity to public transport". This conflicts with the recommended building heights in the following sub-section. Figure 10.18 shows the site with a recommended height of 30m and the text states that "a 32 metre height control is...recommended for land on Lords Road that is close to the Marion Light Rail stop and other nearby facilities and services such as Kegworth</p>

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	<p>Public School and Leichhardt Marketplace".</p> <p>There needs to be further consideration of the scale of the built form outcome for the site. This should include submission of an urban design study justifying the height and density controls sought by the proposal (refer to Urban Design comments).</p>
<p>The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy</p>	<p>The approach taken to considering the planning proposal against the desired future character of the Taverners Hill precinct is appropriate, however further consideration is required by Council as to the proposal's contribution.</p> <p>Notwithstanding, concern is raised with regards to the impact of the proposal on achieving the desired preservation of the leafy, residential and low scale character north of Parramatta Road between Hathern Street and Lords Road. The pre-planning proposal asserts that the scheme would achieve an appropriate transition to adjacent low scale residential. This needs to be further justified (refer to Urban Design comments).</p>
<p>The planning proposal demonstrates design excellence can be achieved, consistent with councils adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines (Planning and Design Guidelines).</p>	<p>The planning proposal must adequately demonstrate that it is consistent with the design excellence provisions of the PRCUTS Planning and Design Guidelines. The pre-planning proposal submission does not include detailed consideration of the proposal with regard to these provisions.</p>

Criteria 2

An Integrated Infrastructure Delivery Plan (IIDP) is yet to be provided. The planning proposal will need to detail how it will contribute to various infrastructure items to realise the PRCUTS vision. The IIDP is to include a methodology for calculating the local and state infrastructure contributions.

Criteria 3

While the preliminary engagement with surrounding residents and existing tenants on the site is acknowledged, further consultation is required in relation to the detailed proposal. The Consultation Report notes that engagement with a number of stakeholders, including government agencies and Kegworth Public School has not been possible.

Overall, the engagement undertaken is inadequate and there is no evidence that the requirement for an appropriate level of support or agreement has been satisfied. To satisfy Criteria 3 of the Out of Sequence Checklist, a planning proposal would need to detail:

- the nature of consultation undertaken;

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- stakeholders engaged, including the extent of notification areas;
- material provided to consultees; and
- evidence of stakeholder support.

Council has received correspondence (attached) from the South Haberfield Action Group outlining their opposition to the rezoning of the site and redevelopment for residential purposes. Future consultation and any planning proposal should take account of the concerns raised. This will be fundamental in obtaining the required stakeholder agreement.

The pre-planning proposal refers to further consultation being undertaken “through formal exhibition of the proposal following a Gateway decision”. Consultation required by a Gateway determination is of no consequence to, and will go no way towards satisfying Criteria 3 of the Checklist.

Criteria 4

A sustainability report demonstrating how the proposal achieves or exceeds the targets of the Strategy is to accompany a planning proposal.

Criteria 5

The pre-planning proposal does not provide a thorough economic analysis to demonstrate feasibility with regard to the likely costs of infrastructure and the proposed funding arrangements available for the Precinct. This analysis should be informed by the Integrated Infrastructure Delivery Plan required under Criteria 2. A feasibility study should demonstrate the economic feasibility of the infrastructure works identified in the PRCUTS Infrastructure Schedule and how the works will be funded.

The submission makes reference to the development not being delivered until 2023. The relevance of this comment is unclear. The PRCUTS is a 30-year plan. While the Implementation Plan 2016-2023 provides the framework for the short-term delivery of the Strategy, the phasing of the Corridor's transformation beyond this time has yet to be determined. It is unreasonable to assume that land not identified for development between 2016 and 2023 will be ripe for development in 2024.

Criteria 6

Any planning proposal should be accompanied by a thorough needs assessment of the existing/future market conditions to support rezoning in the current context. As noted above, a peer review of the EIA will be undertaken should a planning proposal be lodged. This will ascertain whether the proposal adequately satisfies Criteria 6 of the Checklist.

Notwithstanding, the following preliminary concerns are raised in relation to market viability:

- The development would result in the loss of employment and urban services land which PRCUTS envisages being retained until at least 2023.
- The EIA notes that “soaring and sustained price growth in recent years is reflective of a market that is inadequately supplied”. In demonstrating the market viability of the proposed residential development, sustained and significant growth in house prices should not be primarily attributed to an undersupply of housing.

Urban Design

- The submitted Urban Design Study relies on the built form controls prescribed in PRCUTS rather than demonstrating its own independent design merit. In this regard, the proposal does not provide a sound rationale for the sought FSR and height controls.

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- The report does not interrogate any alternative built form outcomes for the site to make its case for the preferred option.
- There are concerns regarding the relationship between the proposed building heights and surrounding context. The proposed building envelope is inconsistent with the prevailing built form character and the desired future character of the precinct.
- Any planning proposal should be supported by an analysis of the visual impact on the surrounding area. This will ensure that the height controls for the site have regard to the existing surrounding context.
- Any proposal to establish a reduced level height control needs to be accompanied by a site survey. While the site analysis provides some levels across the site, these need to be verified against a professional survey plan. Council's property records identify Lot 1 DP 550608 as being burdened by easements. The nature and extent of any affectation should be identified.
- The cross sections and elevations do not provide RLs to allow the floor to ceiling heights or maximum building heights to be determined.
- The report does not provide a basement plan/footprint to allow the extent of proposed deep soil area to be determined. There are concerns that basement car parking would limit the opportunities for on-site deep soil and tree planting.

Affordable Housing

The proposed affordable housing does not satisfy the mandatory affordable housing contribution of the Inner West Affordable Housing Policy which is 15% of gross floor area. The argument that the Inner West target is inconsistent with that of other councils lacks cogency. Any case for a housing target needs to be evidence based. While evidence for Council's target is provided in its Affordable Housing Policy, no evidence is provided for the proposed offer, relative to local need. The exclusion of moderate income households from the eligibility requirements is also an inconsistency with Council's policy.

While the proposed agreement with Bridge Housing is noted, this approach is also inconsistent with Council's Policy, which seeks ownership of these properties to enable more flexible use and respond to changing demand over time. In relation to the proposed allocation of 18 studio and 17 one bedroom apartments, it is not clear why larger apartments that would provide for families with children have been omitted. No justification for this configuration based upon housing-need data is provided. The EIA identifies that family households in the Analysis Area have increased over the 2006-2016 period, accounting for 60.3% of all households in 2016, with families with children being the dominant family cohort (47.4% of all family households).

Open Space and Public Domain

The PRCUTS Planning and Design Guidelines identify the Taverners Hill Precinct as being deficient in local open space, particularly north of Parramatta Road. Redevelopment of the site presents an opportunity to address the shortfall.

For open space to make a genuine contribution to the recreation needs of the local community, it must be appropriately located and designed. While likely to provide recreation opportunities and improved amenity for the occupants of the proposed development, the open space shown would be of little benefit to the wider community. As a minimum, the open space should have greater interface with the existing public domain.

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The proposal states that it “provides pedestrian improvements along Lords Road between the pedestrian light rail underpass and Kegworth Primary School”. The documentation submitted does not demonstrate how the proposal will contribute to Lords Road being prioritised for pedestrians.

Community Strategic Plan

In June 2018 Council adopted a new Community Strategic Plan (CSP), *Our Inner West 2036*. Any planning proposal must address *Our Inner West 2036*, rather than the former Leichhardt Community Strategic Plan.

The CSP is guided by the principle: To work together in a way that is creative, caring and just. In the case of this proposal, creative is a key component of the principle and the Plan commits Council to the following expression:

Inner West is an environment where all forms of creativity flourish. This generates socio-economic growth and development, linking together the economy (creative industries), places (creative spaces) and people (creative talent), making a 'creative ecosystem' that reflects the relationship between creativity and place.

Traffic and Transport

- Prior to any rezoning commencing, the PRCUTS Implementation Plan requires completion of a precinct-wide traffic study and supporting modelling which considers the recommended land uses and densities, as well as future Westconnex conditions, and identifies the necessary road improvements and upgrades required to be delivered as part of any proposed renewal in the Precinct. The above mentioned study is being undertaken in collaboration with the Department of Planning and Environment (DPE) and its completion is not anticipated until the end of March 2019. It is unlikely that a planning proposal could be supported prior to the completion of this study.
- Concern is raised regarding the increased use of Davies Lane and the possibility that vehicles associated with the new dwellings fronting Davies Lane may try to park (even temporarily) in Davies Lane, severely restricting access to the rear garages of properties fronting Davies Street. This is further exacerbated by the internal road exiting onto Davies Lane.
- While the active transport link through Lambert Park is discussed, there is no formal commitment to this from either party. This connection is unlikely to be achieved unless Lambert Park is reconfigured.
- Application of a green/home-based travel plan will assist in reducing private car dependency, particularly at a site with proximity to both light rail and buses, however current spare capacity/occupancy levels on the network is uncertain (the applicant's assessment and Council's assessment seem to differ).
- The proposed access road is located in close proximity to the 90 degree road bend which may result in unsafe conditions for vehicles turning right into the site.
- “Scenario 3” indicates Level of Service F at the Marion/Foster intersection for 2028, however no assessment of the public transport impacts (either delay due to the LoS F, or the increased population) on spare public transport capacity by 2028.
- The current proposal will generate additional pedestrian traffic in Davies Lane. To ensure pedestrian safety, provision of a 1.5m wide footpath will need to be considered. This would require the dedication of land along the length of Davies Lane.

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- To enable vehicles to exit Davies Lane in a forward direction, a "Y" turning head may be required at the northern end of the lane.
- The traffic report states that the assessment is for "63-73 Lords Road, Leichhardt". However, the study area should be "63-75 Lords Road, Leichhardt".
- The survey date and raw data have not been provided for the "Existing Peak Hour Traffic Volume" for the intersections along Foster Street and Tebbutt Street (presented in Figure 2.8).
- The traffic report (Table 6.1) notes that the traffic generation of the existing development is estimated using the RMS guide. An overall rate of 1 trip per 100sqm was applied to all light industrial type uses which result in a higher generation rate for 'warehouse and storage' use. The RMS guide specifies that 0.5 trips per 100sqm for warehouses and 1 trip per 100sqm for factories. Traffic generation rates should be revised in accordance with the RMS guide.
- An overall rate of 1.69 trip per 100sqm was applied to all office/community space type uses. The RMS guide specifies 1.6 trips (AM peak) and 1.2 trips (PM peak) per 100sqm for offices. Traffic generation rates should be revised in accordance with the RMS guide.
- Notwithstanding the overall reduction in the peak traffic generation identified, the most critical times for the location are during school pick-up and set down. As such, the likely traffic movements at these times should be demonstrated (through surveys of similar developments in the inner west).
- The existing traffic surveys were undertaken in 2013. The relevance of the data should be justified, and evidence presented of the business occupancy in the precinct during the survey.
- The traffic report used RMS (TDT2013/04) Sydney Average traffic generation rate for high density residential flat dwellings of just 0.19 peak vph per unit. The surveys used to derive this rate include those from St Leonards and Chatswood, which have very different traffic generation rates than the inner west. The traffic generation rates shall be amended to use a rate of 0.3 peak vph per unit which is derived from the RMS survey data, excluding St Leonards and Chatswood.
- Both Figure 6.1 and Figure 6.2 show the PM peak hour traffic volume generated from the study area. AM peak is not presented.
- Further clarification is required regarding traffic distribution at the Lords Road/Foster Street intersection.
- Concern is raised regarding the potential for additional right turn movements at the Foster/Tebbutt Street/Kegworth Street intersection, particularly during school peak period.
- The ability to comply with the car parking requirements of Leichhardt DCP 2013 should be demonstrated.
- Section 7: Intersection Capacity Analysis
 - Clarify the growth rate that was used in the analysis
 - SIDRA calibration and validation report to be provided for review

2. Additional Information

Site-specific Development Control Plan provisions

A planning proposal of the nature outlined would need to be accompanied by site-specific DCP provisions to be incorporated into Leichhardt DCP 2013. This would constitute a Complex DCP amendment under Council's Fees and Charges and as such a fee of \$35,000 would be payable at lodgement (in addition to the \$100,000 Complex LEP Amendment fee).

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Social Impact Statement

A Social Impact Statement is required to be prepared in accordance with the guidelines of the former Leichhardt Council. This approach to identifying social impacts (positive and negative), strategies and mitigation measures is the established mechanism for ensuring the balanced assessment of a proposal.

The Social Impact Assessment should take account of the Leichhardt Community and Cultural Plan 2011-2021 which identifies this site as being a component of the Iron Cove Arts, Culture and Recreation Corridor, containing significant creative sector employment lands, recreation lands, and community infrastructure.

Flood Study

The site is identified as a Flood Control Lot and as such a flood study must be submitted with a planning proposal. The study must establish the flood planning level, the probable maximum flood level and the hazard category. The study should be informed by an updated Flood Certificate obtained from Council. Without a flood study, consistency with Ministerial Direction 4.3 cannot be determined.

An overland flowpath must be maintained along the western boundary of the site. The existing flood waters pass from Parramatta Road, through George and Upwards Streets and on to Beeson Street. As the waters cannot pass the rail embankment, the flood waters travel alongside the embankment to Marion Street where it then has access to Hawthorne Canal. This flowpath will need to be maintained as part of any proposal to ensure that flooding of other properties in Lords Road or Kegworth Street is not exacerbated.

Heritage Impact Study

A Heritage Impact Study must accompany a planning proposal for the site. The study should consider the impact of the proposal on nearby heritage items, including the former house located within Lambert Park and Kegworth Primary School.

Contamination

While the pre-planning proposal states that an updated contamination assessment will be prepared to support the planning proposal, it is pertinent to note that in addition to a preliminary investigation, a detailed investigation may be necessary to adequately satisfy the requirements of SEPP 55 and demonstrate that the land can be remediated to make it suitable for the intended use.

Acid Sulfate Soil Study

The site is identified as having a probability of containing acid sulfate soils. Accordingly, an Acid Sulfate Soils Study must accompany a planning proposal for the site.

Voluntary Planning Agreement

Council will be seeking 50% of any uplift in value facilitated by amendment of the planning controls for the site, to be secured through a Voluntary Planning Agreement (VPA). A VPA offer is to be submitted with a planning proposal and is to contribute towards meeting local infrastructure/service demands.

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Note: A new fee structure for planning proposals and DCP amendments was adopted by Council on 24 July 2018. In addition to allowing for the recovery of costs associated with additional studies and peer reviews, it also stipulates that the costs of referring planning proposals to the Inner West Planning Panel and Architectural Excellence Panel are to be borne by proponents.

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From:
Sent: Saturday, 6 October 2018 9:31:01 AM
To: Inner West Council
Subject: Haberfield residents against Lords Road rezoning

Dear Mr Hart,

Haberfield residents are alarmed that Platino Properties is again trying to get the 67 Lords Road site rezoned to high-rise residential uses.

We had a meeting last week as the South Haberfield Action Group, and released the attached statement.

We urge Council to continue opposing the rezoning, and support our call for genuine consultation over the future of this important community resource.

Convenor

This email has been scanned by Symantec Email Security cloud service on behalf of Inner West Council.

South Haberfield Residents Statement

The owners of our local industrial site, at 67-73 Lords Road, Leichhardt (Platino Properties), is preparing a new bid to rezone the site for high-rise residential development. It is only 12 months since the last bid to rezone this land to residential was rejected by the Regional Planning Panel.

Platino Properties has been carrying out a sham consultation before resubmitting its plans. They want to argue that their redevelopment should be given priority so it can occur out-of-sequence before 2023. Their consultants have met some Leichhardt residents, who repeated their objections to the proposed scheme. But they did not talk to local Haberfield residents, not even those who addressed the Regional Planning Panel which rejected the proposed rezoning. They put on a planning display at the Haberfield library, but did not leaflet or inform most of the Haberfield houses directly affected.

The 'consultation' is a sham to justify a redevelopment almost as large as that rejected.

We object to the proposal for rezoning and intensive residential development of this site because:

1. The site with its diverse employment uses provides local services to the community including cultural and recreation services. This area has already lost much of its industrial lands, but a community is more than just dwellings.
2. The development is grossly out-of-scale with the surrounding community.
3. The increased residential population will put additional strain on local services such as the school and light rail
4. The development will increase traffic and congestion around the school, pedestrian routes and bike paths.
5. Residents in Haberfield will suffer a loss of privacy and sunlight, with likely effects on their property value.
6. The proposal has not taken into account that Haberfield is a heritage conservation area, subject to height restrictions which should apply to developments adjoining the conservation area.

We call upon our Local, State and Federal Government representatives to reject the redevelopment schema for the Lords Roads Industrial Lands.

We call on Platino Properties to meet representatives of the local community including the South Haberfield Action Group and the Lords Road Precinct Residents Committee to negotiate an acceptable consultative planning process.