

Item No: C1017 Item 3

Subject: **PLANNING PROPOSAL SNAPSHOT OF 4-38 CARRINGTON ROAD,
MARRICKVILLE**

File Ref: 17/4718

Prepared By: Katie Miles - Strategic Planner

Authorised By: Gill Dawson - Group Manager Strategic Planning

SUMMARY

On 22 May 2017, Council received a Planning Proposal for the site known as 4-38 Carrington Road, Marrickville. The Planning Proposal seeks to amend Marrickville Local Environmental Plan (MLEP) 2011 as follows:

- Rezone the IN1 General Industrial zoned land to part B2 Local Centre and part R4 High Density Residential;
- Impose varied maximum building height development standards for the site of 25 metres, 50 metres up to a maximum height of 105 metres; and
- Increase the floor space ratio (FSR) development standard from 0.95:1 to 3.15:1.

The purpose of this report is to provide an overview of the Planning Proposal for Council's information. Please note that Council officers have undertaken a preliminary assessment of the proposal and advised the proponent in a letter of the additional information required. A further report will be provided to Council once additional information from the Proponent has been received and a detailed assessment of the proposal has been carried out.

RECOMMENDATION

THAT Council receives and notes this report.

BACKGROUND

The Planning Proposal at 4-38 Carrington Road, Marrickville, was lodged with Council on 22 May 2017. It seeks to rezone 7.8 hectares of IN1 General Industrial to part B2 Local Centre and part R4 High Density Residential under the *Marrickville Local Environmental Plan 2011*. The justification for the Planning Proposal is reliant upon the NSW Government's Draft Sydenham to Bankstown Urban Renewal Corridor Strategy, and the former Marrickville Council's *Employment Lands Study 2008*, prepared by SGS Economics and Planning.

The Planning Proposal also seeks to impose a varied maximum building height development standards of 25 metres to 105 metres (up to 35 storeys assuming a floor to floor height of 3 metres), and increase the FSR development standard from 0.95:1 to 3.15:1 across the entire site. This will facilitate approximately 2,616 new dwellings and 17,306m² of non-residential floor area (consisting of 10,257m² of commercial floor area and 7,049m² of retail floor area). However, it will remove approximately 63,630m² of existing industrial floor area.

Current Status:

Council officers from various sections of Council and NSW Roads and Maritime Services (RMS) have carried out a preliminary assessment of the proposal. The preliminary assessment has identified that additional information is required to enable a detailed assessment of the proposal. A letter has been sent to the Proponent on 29 September 2017 requesting that additional information and supporting studies be submitted as part of the

Planning Proposal to allow for a detailed assessment. A copy of that letter is provided as **ATTACHMENT 1**.

No voluntary planning agreement (VPA) has been submitted with the Planning Proposal at this stage.

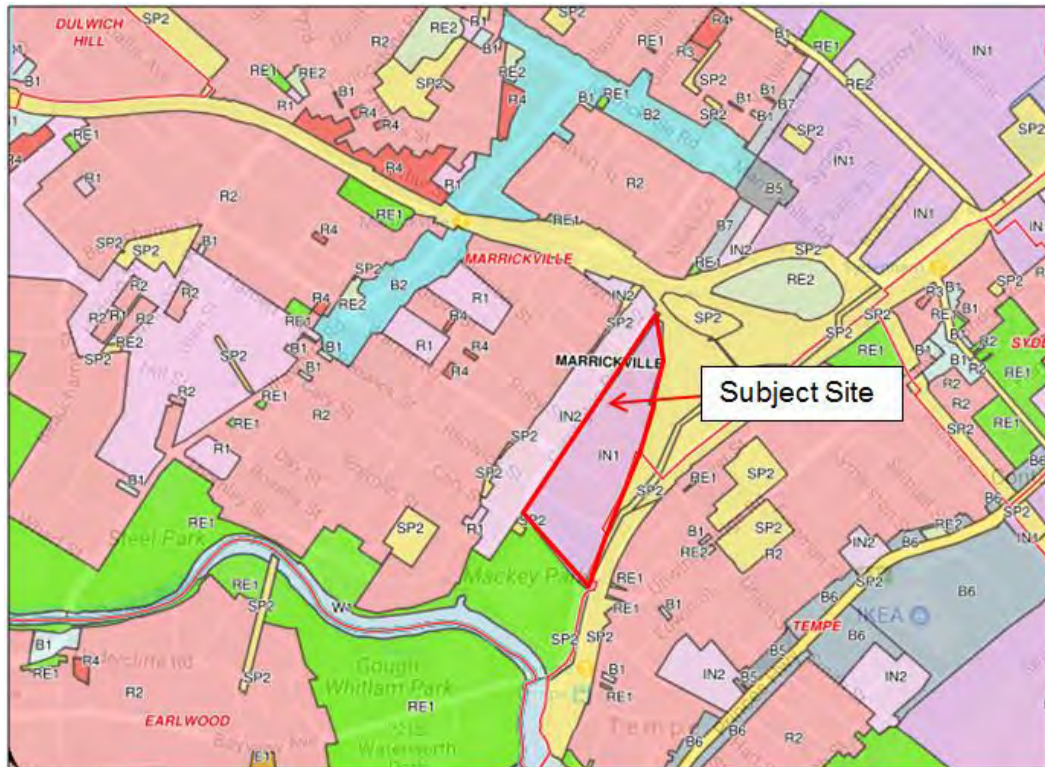


Image 1: Location of 4-38 Carrington Road currently zoned IN1 General Industrial under *Marrickville Local Environmental Plan 2011*.



Image 2: Indicative Built Form Layout described by the current Planning Proposal.

Key Issues:

A future report will be provided to Council once additional information from the Proponent has been received and a detailed assessment of the proposal has been carried out. Any future report will critically analyse the Planning Proposal and address the following issues:

- Loss of employment/industrial floorspace including creative industries;
- Inclusion of commercial/retail floorspace away from the local centre;
- Cumulative traffic and transport impacts;
- Flood prone land;
- Heritage and local character area impacts;
- Urban Design;
- Impacts on Sydney Airport height limits (concurrence of Commonwealth required);
- Provision of open space, recreational facilities and local community infrastructure;
- No affordable housing provision has been nominated;
- Environmental and sustainability impacts;
- Land use conflicts and noise/amenity impacts with existing industrial, aircraft noise and freight railway line; and
- Community benefits and a Voluntary Planning Agreement

FINANCIAL IMPLICATIONS

Additional supporting studies will be required for this Planning Proposal and the proponent will need to fund the studies in accordance with Council's Schedule of Fees and Charges.

Council should be aware of the potential cost implications of funding a precinct wide traffic study. Whilst Council can obtain partial funds from developers as part of the Planning Proposal process, this relates only to the impacts of their proposal and cannot be wholly obtained to assess the cumulative traffic/transport impacts of the precinct. Given the ad hoc nature in which Planning Proposals are being lodged, and the absence of a policy to obtain monetary contributions to fund precinct wide traffic studies, Council should acknowledge there is potential that the costs will be borne by Council.

OTHER STAFF COMMENTS

Strategic Planning has issued internal referrals to various sections of Council and also referred the Planning Proposal to RMS for preliminary assessment. The comments raised from this preliminary assessment were detailed in a letter to the proponent. Upon the submission of additional information, Council staff will carry out a full assessment and report the matter to Council.

PUBLIC CONSULTATION

The proponent will be required to provide additional information prior to public consultation on the proposal. A full report will be presented to council in due course that will address public consultation arrangements.

CONCLUSION

Council has received a Planning Proposal for the site known as 4-38 Carrington Road, Marrickville. The Planning Proposal seeks to amend *Marrickville Local Environmental Plan 2011* by rezoning the land, impose a varied building height development standard and increase the floor space ratio development standard.

The purpose of this report is to provide an overview of the Planning Proposal for Council's information. The Planning Proposal will be reported back to Council in the future once a detailed assessment of the additional information as part of the proposal has been carried out.

ATTACHMENTS

1. [↓](#) Request for Additional Information Letter - PPLN201700003 - 4-38 Carrington Road
Marrickville



Contact: Harjeet Atwal
Phone: 9335 2247
Date: 29 September 2017

MECONE PTY LTD
Attn: Kate Bartlett
On behalf of GVP Group Pty Ltd
Level 12, 179 Elizabeth Street
Sydney NSW 2000

Dear Madam,

RE: PLANNING PROPOSAL PPLN201700003 - 4-38 CARRINGTON ROAD, MARRICKVILLE

Reference is made to your planning proposal application submitted to Council for 4-38 Carrington Road, Marrickville.

An initial assessment of the application has been carried out by various sections of Council and Roads and Maritime Services (RMS). The following additional information and justification needs to be provided to allow Council to complete a thorough assessment of the planning proposal. This letter does not indicate Council's support or otherwise for the planning proposal as a complete assessment cannot be undertaken until these matters have been addressed.

The following two attachments set out Council's requirements:

- Attachment 1 - Assessment of Justification Summary. This is a checklist of whether key strategic merit questions, policies and heads of consideration have been fully addressed. It identifies the additional information that is required to justify the Planning Proposal. This summary is informed by the additional relevant sections of Attachment 2.
- Attachment 2 - Detailed Comments.

Please note: Council would like to facilitate discussions with RMS, Department of Planning and Environment, proponents/property owners of adjacent properties within the Carrington Road precinct to assist in the preparation of the additional information outlined within the attachments.

Should you have any questions or require additional information, please contact Harjeet Atwal 9335 2247.

Yours sincerely



Harjeet Atwal
PLANNING OPERATIONS MANAGER
Trim No. 108202.17

Customer Service Centres

Petersham | P (02) 9335 2222 | E council@marrickville.nsw.gov.au | 2-14 Fisher Street, Petersham NSW 2049

Leichhardt | P (02) 9367 9222 | E leichhardt@lmc.nsw.gov.au | 7-15 Wetherill Street Leichhardt NSW 2040

Ashfield | P (02) 9716 1800 | E info@ashfield.nsw.gov.au | 260 Liverpool Road Ashfield NSW 2131

Attachment 1 : Planning Proposal (PP) Request To Amend Local Environmental Plan (LEP) - Assessment Of Justification Summary				
Key Questions	Relevant Planning Study, Strategy, Matter or Issue.	Meets Requirements/ Consistent	Does Not Meet Requirements/ Inconsistent	Additional Justification / Evidence Required
1. Is the PP the result of a strategic study or report?	2014 Marrickville Employment Land Study		X	Needs to retain industrial uses.
2. Is the PP the best way of achieving policy objectives or intended outcomes, or is there a better way?	August 2017 Made in Marrickville Carrington Road Precinct Study (produced for the Australian Research Council) The PP has not demonstrated that alternative approaches to delivering all the objectives have been fully considered, for example is this the best site in which to provide 2,600 dwellings. August 2017 State government adopted Better placed : A strategic design policy for the built environment of NSW		X	Conclusions that the Precinct has 223 businesses, 1,800 full-time equivalent jobs and the site 148 enterprises & 894-1440 jobs necessary to Sydney's status as a global city need to be addressed. Comparative analysis of alternative approaches needs to be provided. It needs to be sufficiently detailed to allow a valid merit assessment. The PP has not fully addressed the guidance provided by the State government's urban design policy.
3. Is the PP consistent with the objectives and actions of applicable regional, sub-regional or district or strategy (including any exhibited draft plans or strategies)?	This question responds to Q3 in the Department of Planning's "Guide to preparing planning proposals"		X	The short one or two sentence Comments in the PP Table 5 Strategic Merit Test are inadequate. For example evidence of how the PP responds to a change in circumstance and why it is the most appropriate response is required.
3 a) Does the PP have strategic merit?	Plan For Growing Sydney 2014		X	Needs to address all Goals, Directions and Actions individually with evidence of consistency or explanation of

				why particular items are not applicable to this PP. In particular the PP must fully address the Industrial Strategic Lands Assessment Checklist with detailed evidence to support its interpretation of the checklist criteria (See Question 6 below for clarification of which Checklist is appropriate).
		Draft Towards Our Greater Sydney 2056	X	Needs to address each of the three core priorities and sub-priorities.
		Draft Central District Plan November 2016	X	Needs to address all Priorities, Actions and Outcomes individually with evidence of consistency or explanation of why particular items are not applicable to this PP.
		Directions for a Greater Sydney 2017 - 2056	X	Needs to address consistency with 10 Guiding Principles individually. Suitable evidence required.
		Draft Sydenham to Bankstown Renewal Corridor Strategy (Council and RMS have indicated that the PP should be deferred until the Strategy is final. This will give the proponent time to address requirements that the current version does not consider or only partly considers.)	X	Desired future character, building heights, FSR, master-planning entire precinct including adjacent sites, retention of industrial uses and open space provision are among the Strategy themes not adequately addressed by the PP (See Attachment 2 for details).

	Relevant local Council strategy endorsed by the Department of Planning.	Not applicable (NA)		
	Responding to a change in circumstances.		X	The PP has not provided evidence that it responds appropriately to a change in circumstances.
3 b) Does the PP have site specific merit in relation to?	the natural environment		X	The PP needs to fully address a number of environmental issues including flood risk, drainage, the Cooks River Floodplain Risk Management Study and Plan, Water Sensitive Urban Design & urban forest canopy (See Attachment 2 for additional detail).
	the existing uses, approved uses and likely future uses		X	The PP states the site has 383 jobs and would have 896 jobs in future. The August 2017 Made in Marrickville: Carrington Road Precinct study shows there are 148 enterprises & 894-1440 full-time equivalent jobs on the site & this cluster is necessary to Sydney's status as a global city. The PP needs to address in explicit detail how these businesses & jobs will be accommodated in this urban renewal project.
	the services and infrastructure that are or will be available to meet the demands that would arise from the proposal and financial arrangements for infrastructure provision.		X	The PP has not demonstrated that the local road network could accommodate this development. Both RMS and Council concur on this point.

				Active transport infrastructure also requires additional provision. No documentary confirmation from relevant agencies for the acceptability of the proposed building heights in respect of aircraft safety is provided. No provision for adequate flood control infrastructure & ongoing maintenance is proposed. Needs to retain industrial uses.
4. Is the PP consistent with the Council's local strategy or other local strategic plan?	2014 Marrickville Employment Land Study		X	
	Marrickville Community Strategic Plan 2023		X	The PP needs to address how it will facilitate each of the Key Result Areas, Outcomes, Strategies & Actions identified in the strategy.
	IWC Draft Statement of Vision and Priorities		X	The PP needs to address how it will facilitate each of the 8 Priorities and the sub-priorities within these.
5. Is the PP consistent with applicable State Environmental Planning Policies (SEPPs)?	A PP of this scale needs a detailed explanation supported by evidence of how it meets the requirements of relevant SEPPs.		X	Additional urban design studies are needed to show compliance with SEPP 65. The PP states that this will be done at the DA stage, but that would be too late to ensure this proposed residential precinct would achieve high quality urban design outcomes.
6. Is the PP consistent with applicable s117 directions?	A PP of this scale needs a detailed explanation supported by evidence of how it		X	In particular s117 Directions 1.1, 3.4, 3.5, 4.3, 5.10 and

	<p>meets the requirements of relevant s117 directions. The responses in the PP are inadequate. For example in respect of s117 Direction 1.1 the PP Economic Impact Assessment (EIA) refers to the 2010 Metropolitan Plan For Sydney 2036 Industrial Lands Strategic Assessment Checklist, however the Checklist the EIA then refers to is actually the Checklist from the 2013 Draft Metropolitan Strategy for Sydney to 2031. The one in the 2010 Plan is different (Refer page 141 for Summary).</p>		<p>7.1 have not been fully addressed with appropriate evidence to support the claims of consistency put forward. For example in the case of Direction 1.1 the supporting EIA uses the 2013 Draft Metropolitan Strategy for Sydney to 2031 Industrial Lands Strategic Assessment Checklist as a method of demonstrating the consistency, but the material provided does not fully meet the criteria set by the Checklist. Amongst other issues it only addresses the industrial land stock in the region and not in the subregion. It also does not substantiate how the PP would increase employment on the site when there are already more jobs on the site than the number claimed as the total new jobs in the proposed redevelopment.</p>
<p>7. Is there any likelihood that critical habitats or threatened species, populations or ecological communities, or their habitats will be adversely affected by the PP?</p>	<p>The PP has not defined the relationship of the site and the proposed development to the Cooks River wildlife corridor, adjacent "Supporting Habitats" & the Canary Island Date Palms habitat for nesting Australian White Ibis on Carrington Road.</p>	<p>X</p>	<p>The PP needs to specify what studies will be necessary to assess the significance of these matters & related environmental factors prior to any possible Gateway submission.</p>
<p>8. Are there other likely environmental effects of the PP & how does it propose to manage these?</p>	<p>The scope of potential environmental effects not covered by question 7 above and that would arise from this PP have not been fully</p>	<p>X</p>	<p>The PP needs to explain how it would increase the urban forest canopy in accordance</p>

	<p>addressed. The sustainability framework "One Planet Living" provides a benchmark that could be applied to this precinct to deal with likely environmental effects.</p>		<p>with the Draft Central District Plan, Marrickville Urban Forest Strategy, and Marrickville Community Strategic Plan. It also needs to explain how it would deal with waste management, urban heat island and air pollution impacts (See Attachment 2 for additional detail).</p>
<p>9. Has the PP adequately addressed social and economic effects?</p>	<p>The scope of all potential social and economic effects that would arise from this PP have not been fully addressed.</p>	<p>X</p>	<p>Attachment 2 details the additional evidence needed to demonstrate that potential negative social and economic impacts are avoided or mitigated to an appropriate level. This is also essential to show that an LEP amendment could be completed in a reasonable timeframe without social and economic impacts becoming a significant limitation. There needs to be a Social Impact Assessment, that incorporates a Net Community Benefit Test. The short-comings include: the PP does not give enough evidence to show that employment & existing creative industry cluster impacts can be addressed; a more comprehensive heritage assessment is required; and not enough public open</p>

	IWC Affordable Housing Policy		X	<p>space is provided.</p> <p>The PP needs to show how it will meet the requirement of this policy for 15% genuine affordable housing provision. Proponent needs to provide their development feasibility report for review to test the PP's claim that providing affordable housing in line with the Draft Central District Plan is "uneconomical".</p>
10. Is there adequate public infrastructure for the planning proposal?	<p>This question typically applies to PP for developments of over 150 lots; substantial urban renewal, infill projects and that will create additional demand on infrastructure.</p>		X	<p>The PP suggests existing and proposed infrastructure will be adequate to meet the needs of the proposal. Attachment 2 shows that is not the case. The comments of RMS are an example of how the PP does not answer this question fully. The PP also needs to provide an acceptable draft satisfactory arrangements provision for contributions to local & State government infrastructure provision.</p>
11. What are the views of State and Commonwealth public authorities to be consulted in accordance with a Gateway determination?	<p>Evidence of pre-lodgement consultation and agreements with such public authorities in relation to progression of the PP should be provided.</p>		X	<p>Documentation of such material for aviation and other authorities such as NSW Education is required.</p>
12. Is a site specific Draft Development Control Plan (DCP) required?	<p>This is very large site, which has the potential to create a new urban village. Consequently the PP must be supported by a detailed DCP.</p>		X	<p>Provide detailed Draft DCP to amend Murrumbidgee DCP 2011 Part 9 and provide draft Parts 9.44.4 Precinct Specific Controls and 9.44.5 Site Specific Controls in particular.</p>

Attachment 2 – Additional Justification / Evidence Required Details

Requirements for additional justification, evidence and amendments to the Planning Proposal including supporting documents such as the Hill PDA Economic Impact Assessment (EIA) are highlighted in bold.

1. Economic Development and Loss of Industrial Land

The Carrington Road Precinct is currently zoned IN1 - General Industrial under Marrickville Local Environmental Plan 2011 (MLEP 2011) and is occupied by various small and medium scale creative industries. The planning proposal seeks to rezone the site to R4 – High Density Residential and B2 – Local Centre. The residential component would consist of approximately 2600 dwellings and the non-residential component in the B2 – Local Centre zone would have a gross floor area (GFA) of approximately 17,000sqm.

The Carrington Road Precinct is close to established retail/commercial centres such as Marrickville Town Centre and Marrickville Metro (which is currently undergoing expansion). **The provision of retail/commercial floor area in the site including the 1,900sqm supermarket could negatively affect the viability of the existing centres by redirecting customers/patrons and business operators to the proposed precinct and needs to be reduced.** The Draft Sydenham to Bankstown Corridor Fine Grain Study recommends that new retail provision for the Carrington Precinct should build upon the existing Marrickville retail structure rather than create a separate competing retail centre. This study suggests retail should be located on the northern edge of the precinct along Myrtle Street and Leofrene Avenue to link the new Charlotte Avenue and the existing station entrances.

The Draft Sydenham to Bankstown Corridor Strategy aims to retain some employment uses and small scale industrial uses at Carrington Road. **The existing stock of industrial and employment land uses within the Inner West Local Government Area (LGA) is limited and in high demand. The Planning Proposal must be amended to retain industrial floor space on site for industrial uses.** Current planning proposals under consideration by Council/Department of Planning and Environment will reduce the stock. This will result in a shortfall of industrial and employment land in Marrickville. The AEC Employment Lands Study for the Draft Sydenham to Bankstown Corridor Fine Grain Study found that there will be a shortfall of industrial floor space in most precincts by 2041 and unmet demand for approximately 247,900sqm of industrial GFA in the Corridor.

The potential loss of industrial land will displace industries which will be forced to move or be priced out due to escalating rents. This in turn will cause the closure of businesses that require proximity to supply chains and markets and depend on these interconnections. Action 4.1 of the Marrickville Employment Lands Study identified the Carrington Road precinct as an opportunity for urban renewal, but envisaged rezoning to a combination of industrial and residential uses. The planning proposal only provides for residential and retail/commercial zones and no industrial zones or provision for industrial floor space.

The proposals net loss of industrial floor space is inconsistent with S.117 Directions, and the Draft Central District Plans Productivity Priority No. 5. The Hill PDA 2015 Industrial Precinct Review prepared to inform the Draft Central District Plan has not been referred to in the Planning Proposal. The Tempe, Carrington Road industrial area scores above average (10.5) in the health check provided by this Review. **The Planning Proposal must be amended to address these concerns through increased provision of industrial floor space.**

Many of the businesses on site are small to medium enterprises (SME) supporting local employment. The Australian Research Council's August 2017 report *Made in Marrickville: Enterprise and cluster dynamics at the creative industries-manufacturing interface, Carrington Road precinct* identifies 148 enterprises & 894-1440 full-time equivalent jobs on the site and 15

functional enterprise clusters in the precinct with a creative industry/manufacturing interface that is vital to the economic functioning of global cities.

The Federal Government commissioned this study "to foster and deepen the creative industries / manufacturing interface through spatial planning and policy". Consequently this report which has taken the Carrington Road Precinct as one of its three Australian case studies is a particularly authoritative and objective benchmark for how the future of the Precinct should be planned by Local, State and Federal government. Council considers it is therefore a key strategic study that must be referenced and the issues it raises fully addressed by any Planning Proposal to rezone land in the Precinct.

The Planning Proposal EIA Page 34 – Response 7 refers to 896 jobs on the site. This will not balance more than 4,500 residents when 80% (2011 Census) of local residents leave the area for work and does not improve local work opportunities. In fact, as indicated in *Made in Marrickville* the rezoning would result in a net loss of jobs (894-1440 full-time equivalent jobs on the site).

The *Made in Marrickville* report concludes that Sydney's status as a global city relies on the Carrington Road precinct due to its complex networks that span the city, the nation and the globe. Cultural icons such as Sydney Opera House, Sydney Theatre Co. Sydney Gay and Lesbian Mardi Gras, Chinese New Year, and Vivid Festival all rely on supplier and servicing relationships with Carrington Road enterprises which include many companies that have been Oscars, BAFTAs and ARIA award winners.

The creative clusters on the site require to be co-located on affordable, physically suitable industrial land close to major economic and cultural hubs including the Central Business District, airport and Port Botany. The existing industrial land has the right mix of older, low rent buildings with suitable roof heights and truck access, and host many similar micro-enterprises that cannot afford the rents required for conventional, modern commercial premises.

Made in Marrickville states "the assumption that inner-city manufacturing can and will simply relocate to large greenfield sites on the city fringe is not borne out empirically". Should suitable space not be available locally, many of the Carrington Road premises will cease trading or leave Sydney altogether, resulting in significant job losses, industry, experience, enterprises and talent that cannot be offset by short term jobs in construction and retail.

The retail floor area within the Planning Proposal should be reduced and the commercial/industrial component increased to encourage industrial activity with diverse employment and designed to accommodate the existing manufacturing-creative industries and urban services uses. The proposal must incorporate multi-use floor plates for a variety of business/industry sizes and types. Alternative zoning options such as B4 – Mixed Use, B6 – Enterprise Corridor, B7 – Business Park and Industrial zoning such as IN2 Light Industrial supporting a mix including industrial uses should be provided.

Page 24 of the EIA report suggests that Marrickville has an unemployment rate of 5.3% and the creation of additional jobs on the site will assist in ameliorating the rate. This figure is based on 2011 census and **needs to be reassessed with regard to the type of employment created by the development, the 2016 census unemployment rate, and the degree of congruence between the two as the real rate for active jobseekers is more like 3.8%. Also, the EIA page 33 – response 5 must be updated to acknowledge the amount and potential impact of the loss of casual employment and lower skilled employment which is currently offered on the site.**

The heritage listed 10 Carrington Road and proposed heritage listed 16 Carrington Road are proposed to be adapted to provide 'creative spaces', co-working spaces and the like to accommodate start-ups, commercial creative activities and other emerging businesses. **The redevelopment should show how it will be able to accommodate the existing low cost rental base for creative industries.** To achieve this will require recognition of the relatively low employee/sqm ratio found in these types of employing sectors. In order to minimise commercial displacement and commercial closures of existing users, consideration may be required to create

10

these spaces early in the project so as to maximise the opportunity to retain as many as possible of the existing employers and jobs.

Council will engage an independent consultant to undertake a review of the economic development impacts of the planning proposal and the Hill PDA Economic Impact Assessment. Further information may be required on completion of this review. The costs of this review must be paid for by the proponent in accordance with Councils Fees and Charges and Clause 11 of the Environmental Planning and Assessment Regulations, 2000.

2. Traffic and Transport

Roads and Maritime Services

Roads and Maritime Services (RMS) have raised concerns about whether the planning proposal should proceed prior to completion of planning investigations for the Sydenham to Bankstown Priority Precinct. **RMS recommended the proposal be deferred until such time that the Sydenham to Bankstown Priority Precinct planning investigations and Traffic and Transport Impact Assessment is finalised and a funding delivery mechanism for infrastructure is adopted.** RMS provided two sets of comments.

In the first set they RMS advised:

- (i) Any planning proposal for the site should be consistent with the intended outcomes of the strategic planning investigations for the Precinct.
- (ii) The proposal may set a precedent with other land owners within the precinct requesting increased uplifts and land uses inconsistent with the overall vision for the precinct as outlined in the Sydenham to Bankstown strategy.
- (iii) The potential cumulative traffic and transport impacts of this and other future proposals on an already constrained local and regional road and transport network should be assessed in the context of the cumulative Traffic and Transport Impact Assessment for the Sydenham to Bankstown Priority Precinct with the level of developer contribution commensurate with an identified Special Infrastructure Contribution for the Precinct.

In the second set of more detailed comments, RMS advised that:

- (i) In the absence of an agreed funding mechanism established for the Sydenham to Bankstown Priority Precinct, a Voluntary Planning Agreement would need to include an agreed package towards local and regional road and transport infrastructure works required to support the scale and level of development as well as costings, timings and trigger points for the staged delivery of transport infrastructure upgrades.
- (ii) **The Traffic Impact Assessment (TIA) prepared by The Transport Planning Partnership is considered insufficient in regards to its assessment of the cumulative traffic and transport impacts of the proposed development on the surrounding local and regional road network. Additional traffic and transport analysis is required for the following matters:**
 - a. The adopted traffic generation rates have been derived from the traffic generation rates published in the Roads and Maritime Services Technical Direction TD 13/04a for high density residential developments using the AM / PM vehicle trips per car space. This is not supported given the high level of residential dwellings proposed for the development and the unknown nature of the commercial and retail components of development. **It is recommended that traffic generation be calculated based on the maximum developable yield for the site and should therefore be calculated using AM / PM vehicle trips per unit and GFA respectively.** Using the Sydney average for AM / PM peak vehicle trips per unit would therefore result in a higher number of vph in the AM / PM peak than that calculated in the TIA and acknowledges that development (or the

- particular type of land use) often generates more traffic than the car spaces provided. This may result in an increase in on-street parking on streets around the development.
- b. **An addendum to the TIA should confirm the distribution/assignment of traffic generation and the background growth rate used.**
 - c. **The SIDRA modelling has been undertaken for a limited number of intersections surrounding the proposed area (three intersections). RMS is not wholly satisfied that a thorough assessment of the cumulative traffic impacts of development has been undertaken on the surrounding local and regional road network. The addendum to the Traffic and Transport Assessment should undertake network wide modelling assessment which assesses the traffic impacts of development on the broader regional road network. Council's comments below identify additional intersections that must be analysed.**
 - d. **The Traffic and Transport Assessment must provide information in relation to the mode share of trips generated by the proposal and users in particular for public transport services, pedestrians and cyclists. Further information is therefore required in relation to future public transport, pedestrians and cyclists demand generated by the proposal and the adequacy of existing and future public transport services including Sydney Metro City and Southwest and active transport infrastructure to cater for additional trips generated by the proposal.**
 - e. **An addendum to the TIA will need to provide further information in relation to the proposed intersection upgrades and associated traffic modelling assumptions as follows:**
 - **Identify the assumptions used in the traffic modelling for the phasing arrangement and cycle times for proposed intersection upgrades.**
 - **There are issues with the proposed upgrade at the Unwins Bridge Road/Richardson Crescent (TCS 463) intersection which will need to be addressed:**
 - **The short dual right movement from Richardson Crescent needs to be modelled with full pedestrian protection.**
 - **The majority movement for the right turn from Richardson Crescent into Unwins Bridge Road then left into Gannons Road towards the Princes Highway. The dual right would have very limited benefit as this lane would be required to merge into a single lane at the roundabout at Unwins Bridge Road and Gannons Road. This arrangement needs to be considered in the modelling.**
 - **The short right turn bay southbound on Unwins Bridge Road would only need a few cars to queue out then block all traffic on Unwins Bridge Road. Given the main phase at this intersection is the southbound through and right turn from Unwins Bridge Road, this arrangement would be inefficient.**
 - **Reducing the footpath widths to provide lane modifications impacts pedestrian safety. Footpaths in this location are extensively used by school children travelling to/from Tempe Station to nearby schools. RMS need evidence of consultation undertaken with surrounding schools and support given for the footpath reduction.**
 - **This intersection has recently been upgraded due to pedestrian safety concerns (widening of kerb ramp, improvement of turning paths, phasing changes) which should be taken into consideration as part of any intersection upgrade.**
 - **The existing intersection configuration does not have additional capacity to accommodate the proposed lane modifications as outlined in the Traffic Report. Land acquisition of public and privately owned lands is therefore required to facilitate the proposed intersection upgrade with land to be acquired presently used as public footpaths and private gardens. RMS seek advice that an in principle agreement has been made with Council and private land owners for the lands identified for future intersection upgrade.**

12

- f. Insufficient information has been submitted to support the proposal for an intersection upgrade at the Victoria Road/Marrickville Road (TCS 68) intersection. An amended Traffic Assessment should provide a more detailed analysis of the proposed changes to enable a proper assessment of the proposed upgrade.
 - g. It is noted that the TIA highlighted that even without the proposed improvements, some intersections would operate above capacity Level of Service F in coming years, even if the proposed development did not proceed (as modelled under Scenario 2). It should be noted that **with the upcoming uplifts associated with the Sydenham to Bankstown Priority Precinct, the cumulative traffic impacts will place even greater strain on existing intersections and increased pressure on an already constrained road network. Regardless, the proponent will need to quantify the traffic impacts of their development on the road network and provide appropriate mitigation measures to support the scale and level of development.**
 - h. **Submission of relevant SIDRA model files for further detailed assessment.**
- (iii) Given the provision of existing and future public transport services surrounding the site area, RMS has serious concerns with the proposal to provide approximately 3,500 car parking spaces on-site given the influence that car parking provision has on potential traffic generation. Further analysis should be undertaken to determine car parking requirements for a development of comparable size and mix of developments in close proximity to public transport as a benchmarking exercise to determine an appropriate level of car parking. RMS strongly encourages a concerted effort to reduce the provision of car parking spaces with justification required for such a high provision given the parking rates outlined in the RMS Guide to Traffic Generating Development and State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development.

The proposed Green Travel Plan is noted and supported, however it needs **more detailed information and additional work on its implementation** through either approval for the Planning Proposal and/or as a condition of consent for Development Applications.

Inner West Council Traffic Concerns

Some concerns outlined below may be similar to RMS comments and must be addressed.

Council is concerned that the development could become a sub-regional attractor placing significant pressure on local neighbourhoods and road networks. **The Planning Proposal does not consider the cumulative impacts of numerous proposals/developments in the vicinity of the site.** Given the scale of the proposal, significant population growth could occur prior to completion of the necessary transport infrastructure that underpins the Sydenham to Bankstown Strategy.

A Precinct Wide Traffic Analysis needs to be completed in partnership with RMS and Transport for NSW for the planning proposal and the proponent will need to fund the costs of this study in accordance with Council's Schedule of Fees and Charges. The Analysis should consider an option to significantly reduce private residential parking in the development to demonstrate how this might mitigate adverse cumulative traffic impacts.

This analysis must address the cumulative traffic impacts of the Planning Proposal and other proposed significant developments in the local area, such as the approved Marrickville Metro expansion, the potential Victoria Road Precinct planning proposal (bounded by Addison Road; Fitzroy Street; Sydenham Road; Shepherd and Farr Streets), recently approved Masters development at 74 Edinburgh Road Marrickville, Sydney Airport precinct and West Connex. It should also include a scenario which examines the

western side of Carrington Road being redeveloped and each intersection along Carrington Road with development impacts on both sides of the road.

The TIA submitted with the Planning Proposal was reviewed by Council's Traffic Engineer and the following revisions are necessary:

- (i) **Additional details and intersection analysis for:**
 - Warren Road/Illawarra Road,
 - Renwick Street/Illawarra Road,
 - Schwebel Street/Illawarra Road,
 - Carrington Road/Warren Road,
 - Carrington Road/Renwick Street,
 - Carrington Road/Schwebel Street,
 - Roundabout intersection of Richardsons Crescent/Richardsons Crescent near Mackay Park,
 - Each intersection along Carrington Road with development impacts on both sides of the road,
 - All intersections within the site,
 - Intersection capacity analysis for length of queuing data for each base case and scenarios, and
 - Information on all inputs into the intersection analysis model and reasoning and include analysis data (SIDRA) electronically.
- (ii) **Details of heavy vehicle routes and access points for the site and impacts on the aforementioned intersections.**
- (iii) **Details of retail/commercial circulation, collections and deliveries and impact on local traffic volumes.**
- (iv) **Richardson's Crescent/Unwins Bridge Road is a problem area for traffic and pedestrians and a solution that addresses both is required. Particular concern is raised for pedestrians/cyclists between the site and Mackey Park and at the Richardsons Crescent intersection roundabout.**
- (v) **Investigate potential pedestrian crossing options for Carrington Road, particularly in the vicinity of the proposed commercial uses.**
- (vi) **An analysis of the transport and traffic merits of road widenings at:**
 - Richardsons Crescent from Carrington Road to its signalised intersection at Unwins Bridge Road.
 - Unwins Bridge Road between Edgar Street and Gannon Street. This road widening would involve 2 north bound lanes from the roundabout at Gannon Street to Richardsons Crescent and improved left turn out manoeuvres for heavy vehicles from the Richardsons Crescent into Unwins Bridge Road. This could also facilitate the widened footpath at this location and may improve the safety of school children going to and from Tempe High and Primary Schools on Unwins Bridge Road. This would necessitate the acquisition of adjacent properties.
- (vii) **Investigate potential signalised intersection at Unwins Bridge Road and Gannon Street as a result of the additional traffic.**
- (viii) **The Traffic Assessment estimates that the development would generate 50% travel to work by car to/from the site at present; a significant modal shift from this figure must be achieved for any future development. This modal shift to public/active transport from typical car based travel to work patterns in the area has to be significantly increased.**

14

Commentary on the provision of a Travel Plan is welcome however clarity is required about who would be responsible for its implementation and on how targets will be achieved. Further information is required on the rationale for splits in the traffic assignments. Latest census data must be used to develop the modal split and information is required for the modal split data and reasoning.

- (ix) Any associated loss of existing on-street parking surrounding the development site must be clearly identified. Examine options to provide additional on-street parking or maintain at a minimum the existing on-street parking along Carrington Road and Richardsons Crescent. Clarification of the proposed loss of 8 "On Street" parking spaces during the evening peak on Victoria Road (noted at bottom of Table 6.4 of the Traffic Assessment).

Transport

The planning proposal should be amended as follows to encourage the use of public and active transport:

- (i) An additional entry to Marrickville Station (Sydney Metro) should be facilitated by this proposal to encourage new residents to travel by train.
- (ii) The provision of 15 Council authorised car-share parking spaces with confirmation of an agreement in principle with a relevant car-share company that would operate these spaces. The number of car-share spaces should be increased if the number of residential car spaces are reduced to mitigate cumulative traffic generation;
- (iii) An agreement in principle with transport authorities to provide public bus services that identifies appropriate bus routes/stop locations within the site.
- (iv) Pedestrian and bicycle routes must be prioritised and not just skirt the site along the eastern channel. They must provide access to the destination points throughout the site, bicycle parking and connections to all local active transport routes.
- (v) The proposal does not provide a meaningful network of pedestrian and bicycle connections other than that to nearby railway stations, despite project objectives recognising the importance of achieving connectivity to a range of destinations. An assessment of connectivity to a more comprehensive range of destinations is required, for example retail destinations such as Marrickville Road and Marrickville Metro, recreation facilities such as Enmore Park/Pool and Cooks River, and local schools and childcare facilities;
- (vi) Provide a shared cycleway connection through the rail land into Fraser Park and then provide a separated cycleway and pedestrian path through the proposed site to link into Mackay Park and along Cooks River. The purpose of this concept is to have connectivity for cyclists and pedestrians to Marrickville Road (east precinct) and to Sydenham Railway Station.
- (vii) Identify through-site cycling links as part of the precinct shared zone (see point (x) below) and more direct routes to external trip attractors including local train stations and connecting bicycle routes to ensure safe, comfortable and convenient conditions for cycling.
- (viii) Establish principles for appropriate width and separation of the bicycle path from adjacent footpaths consistent with Austroads guidance i.e. desirable minimum width of 3 metres for a two-way bicycle path

- (ix) Identify complementary measures to encourage cycling in addition to the provision of cycling routes through the site for example by:
- Improving bicycle priority and visibility at intersections of bicycle paths and local streets to reduce delays/perceived disconnection at the intersections, for example a priority crossing of Carrington Road north of Myrtle Street and bicycle boxes/advanced stop lines at signalised intersections into and out of the site;
 - Creating low-speed environments on streets within the site so that they can function as bicycle boulevards in which bicycle riders of all ages and abilities can feel safe and confident;
 - Working with Sydney Trains/Sydney Metro to ensure adequate provision of bicycle parking at nearby train stations;
 - Installing bicycle wayfinding signage consistent with Council's Bicycle Plan.

- (x) The precinct should be designed to be a shared zone for pedestrians, cyclists and traffic.

Additional pedestrian and cycle bridges are to be provided over the railways to Tempe and to Meek Street to strive to meet the 400 metres walk to station planning principle as per the Draft Sydenham to Bankstown Corridor Strategy.

The Planning Proposal must reflect Action P3 of the Strategy which states that new streets within the Carrington Road Precinct will continue the existing road network west of Carrington Road to be delivered as works in kind by developers (also to be reflected in a Voluntary Planning Agreement).

A proposed new street and pedestrian bridge connection on Myrtle Street may be better located on the alignment of Carrington Road to provide pedestrian access over to Meeks Road in the Sydenham Station Precinct.

- (xi) The non-residential uses of the site should be carefully balanced so as to sufficiently service the development without creating an excessive attractor and placing significant additional pressure on local road networks, from traffic, parking and pedestrian perspectives.
- (xii) It is noted that local observations have witnessed actual traffic volumes in the vicinity of the site being significantly less than RMS estimates for industrial sites such as this. However, the TIA continues to suggest that the ~748vph that may be created by the proposal would be similar to that which could be created by development under the existing permitted land uses, which is incongruent with the previous statements on current activity.

3. Heritage Impacts

The site contains a heritage item (Item No. 168) consisting of the building façade at 10 Carrington Road as listed under Clause 5.10 of Marrickville LEP 2011 (MLEP 2011) and a proposed heritage item, the former A.H. Peters Motor Body Factory at 16 Carrington Road. The site is located in the vicinity of various heritage items and heritage conservation areas under Clause 5.10 of MLEP 2011.

The Statement of Heritage Impact (SOHI) submitted with the planning proposal should be revised to include the following:

- (i) **Assessment of the potential heritage significance of the whole site and in particular the building at 10 Carrington Road against Heritage Council's criteria. The assessment should include gradings of the significance of components in accordance with Heritage Council guidelines. There should also be an explanation as to why the existing structure cannot be retained and adaptively re-used.**

16

- (ii) **Assessment of the potential heritage significance of the industrial building at 144 Renwick Street against the Heritage Council's gazetted guidelines.**
- (iii) **The SOHI concludes that the site had negligible archaeological potential. The former A.H. Peters Motor Body Factory at 16 Carrington Road was not included as a part of the assessment and may have some industrial archaeological potential. An appropriate assessment is required in this regard.**

Please note: Further amendments of the planning proposal may be required subject to the findings of the above assessments.

In addition to the above, the following information is required to assist in the heritage assessment of the planning proposal:

- (i) **Architectural plans clearly showing the intended extent of proposed demolition, alterations and extensions of the heritage items, including but not limited to**
 - **The demolition of the former canteen and necessary reinstatement of the original facade;**
 - **Retention of an adequate length of the return walls at the ends of 10 Carrington Road; and**
 - **Any alterations to the rear part of 16 Carrington Road.**
- (ii) **Details of the intended scope of conservation work on the listed heritage items and a general commitment to conservation according to the principles of the Burra Charter. In addition, the heritage significant Canary Island palms on the footpath must be protected.**
- (iii) **Street-level perspectives showing the relationship of the new buildings to the heritage items. The proximity and height of the building immediately to the south of 16 Carrington Road overwhelm the two-storey factory building. Consequently, the size, form, position/relationship of the new building to 16 Carrington Road should be revised.**
- (iv) **Visual impact assessment for the nearby conservation areas to the east of the site.**

An Oral History record should also be undertaken for this site to capture people's stories and have an official record for this site.

4. Urban Design, Building Height and Density

Draft Sydenham to Bankstown Corridor Strategy (SBCS)

The proposed density is excessive for this site and locality and inconsistent with the desired future character of the precinct and area. The Precinct is not identified as a possible local, district, specialised or strategic centre.

The scale of the proposal exceeds the density and scale envisioned by the SBCS. The Carrington Road Precinct is identified as medium-high rise housing defined as being a maximum of 8 storeys, with an acknowledgement that increased density could be achieved in the northern section, whereas the Planning Proposal has located the bulk of its density at the southern end. The blanket FSR proposal of 3.15:1 is not supported, each of the proposed buildings should be subject to an individual site specific assessment and DCP amendments to ascertain opportunities and constraints within the wider context.

Council supports a detailed master planning process (refer to comments further below under "Urban Design") that ensures the objectives of the Urban Renewal Corridor are implemented.

17

This development would create a new village and the broad brush 'blanket' planning approach adopted by the Planning Proposal is inadequate.

The Planning Proposal should also address the Better Placed policy released by the NSW Government Architects Office that champions good design and great places.

Impacts on Sydney Airport

The height limit (Sydney Airport's Obstacle Limitation Surface – OLS) above the site is 51 metres above ground level. The proposal seeks a maximum building height of RL 105 metres. This exceeds the OLS height limitation by over 100%. This may also apply to cranes during the construction stages. The proponent has included an 'Airspace Constraints Assessment' that has concluded the proposed building heights would not interfere with Sydney Airport; however, this document has not been peer reviewed by the relevant Government Authority. The proposed building heights above the existing OLS (51 metres) requires prior submission of the relevant applications, supported by detailed assessments and safety testing under the Airports (Protection of Airspace) Regulations (APAR), CASA and other relevant requirements.

The proponent has not lodged an application or attached any correspondence with the Commonwealth Department of Infrastructure and Regional Development. The heights have not been reviewed by the relevant Federal agencies at this stage. **Council cannot progress the Planning Proposal until the Commonwealth Department of Infrastructure and Regional Development have been advised of the potential impacts on Sydney Airport and provided their concurrence that the proposed heights do not impede the aviation activities of Sydney Airport.**

Urban Design

Council's Architectural Excellence Panel (AEP) has reviewed the Planning Proposal and advised that the following matters should be addressed to allow a full assessment of the proposed urban design.

- (i) Recent precedents in the former Marrickville LGA have a maximum height of 11 storeys. **The AEP is not convinced that the proposed building heights (maximum of 105 metres/30 storeys) are reasonable or justifiable from an urban design or strategic planning perspective.**

The latest version of the SBCS recommends a medium/high rise housing density (maximum of 8 storeys) for the Carrington Road Precinct. The proposed built form is an unsuitable response to the sites context and to the proposed public domain within the site. A more sustainable development yield with an appropriate urban form and land use mix is required.

Urban form, block structure and building height are to be defined by a strong, clear proposition for the public domain, situating taller building forms where solar impacts on public open space can be mitigated. Higher density elements must be closer to public transport nodes. In some cases, larger buildings should be oriented to the north, with views over green space. Alternatives for the location and distribution of the proposed public domain, its extent, scale and structure should be developed and a justification for the preferred option is to be provided.

- (ii) **A comparative analysis of exemplar Sydney-based urban renewal projects, such as Victoria Park, Harold Park, Green Square, the Ashmore Estate and Central Park should be provided as part of the proponent's Urban Design Report. The comparative analysis must cover matters such as the strategic location and size of each site, the permissible floor space ratio (recognising any distinction between gross and net floor space ratios), building height (in metres and storeys), quantum**

18

of open space (public and communal), number of residential units and dwelling mix, land use mix, street types and hierarchy, block pattern and site coverage amongst other comparators.

- (iii) The proponent's Urban Design Report should also include:
- a. fine grain urban design analysis of the proposed master plan to inform the preparation of the draft precinct and site specific planning controls for inclusion in Marrickville Development Control Plan 2011 (such as street sections, podium height, setbacks, height in storeys, public domain activation and interface, etc.);
 - b. analysis of the proposal in the context of the SBCS (particularly with regard to building height and density);
 - c. analysis of the proposal in the context of metropolitan Sydney's hierarchy of centres (strategic, specialised, district, local and neighbourhood) and transport nodes as set out in A Plan for Growing Sydney and the Draft Central District Plan;
 - d. analysis of flood affected areas in relation to the public domain, and strategies describing how flood levels will affect heritage items and character buildings which are proposed to be preserved, as well as any proposed new buildings; and
 - e. detailed site analysis of the wider Precinct that includes an assessment of natural, cultural and built form features.
- (iv) The proponent's Urban Design Report provides specific design principles that are based on an analysis of the local Marrickville industrial character. It should elaborate on the unique physical attributes that, together, define this existing character. A thorough analysis of the existing urban fabric (materials, built form, scale, proportions and architectural elements) needs to be provided to better inform the architectural response to aspects of the 'Marrickville industrial character' that are worth preserving or emulating.
- (v) The Carrington Road Precinct is one of the largest urban renewal precincts in the former Marrickville LGA and its planning is expected to evolve as an iterative and incremental process. In order for Council to be properly resourced to assess and review the proposal, a respected urban design consultant is to be engaged by Council to develop a baseline urban design analysis and existing character assessment of the Precinct, the development of site specific design principles and to peer-review the master plan on an on-going basis. The proponent will need to fund this work in accordance with Council's Schedule of Fees and Charges.
- (vi) The proponent should undertake meaningful and early engagement with the local community prior to the submission of the amended Planning Proposal to Council. This is crucial to the success of proposals of such scale and importance and this consultation should be sustained throughout the rest of the planning proposal and master planning process.
- (vii) There is an apparent inconsistency between the proposed architectural and urban character fronting Carrington Road and that fronting the railway corridor. To some extent, both depart from the stated urban design principle-based analysis of the Marrickville industrial character in the Urban Design Report. An appropriate level of consistency in urban form is required to be determined through the fine grain urban design, heritage, landscape and sustainability approaches, conveyed into a site specific Development Control Plan (DCP). **Diversity, interest and design excellence should be facilitated in part through mechanisms to ensure multiple architectural authorships across the Precinct.**

- (viii) **The Planning Proposal should provide a masterplan for the precinct that has been developed in collaboration with the adjoining land owners such as 1-5 Myrtle Street & 5-57 Carrington Road.** Council would like to facilitate discussions with proponents/property owners of adjacent properties within the Carrington Road precinct to assist in the preparation of a masterplan.

5. Flooding Risk and Drainage

- (i) The overall strategy should be to direct as much water as possible to the eastern channel to avoid pumping, reduce flooding in Carrington Road and free capacity in the central channel system to drain low lying upstream areas including Fraser Park, Tillman Park etc. **All internal drainage from the site should drain to the eastern channel. This is not currently the case. To achieve this, the trunk drainage should be aligned to have:**
- a. a new high level system draining the site, aligned down road 2 and road 1 and connecting to the eastern channel near the end of road 1, generally with a minimum invert of 1.0 metres AHD for the entire system. This system would collect all water from the roads, park and all buildings north of Renwick Street and direct it to the eastern channel;
 - b. a new low level system, aligned from the existing central channel in the rail corridor down road 1, road 4 and Carrington Road connecting to the pump station. This system would convey water from the upstream central channel catchment and collect road runoff from Carrington Road. A branch to Myrtle Street would collect water from this high risk location; and
 - c. a low point in Renwick Street of 0.92 is maintained. It is suggested to raise Renwick Street to above at least 1.5 metre AHD as per approach on other streets to avoid high risk flooding and prevent high risk depths of flooding as per the approach on other streets.
- (ii) While the proposals drainage is currently discharging to the central channel, a portion is to be diverted into the open segment of the eastern channel. There is likely to be conflict over the available capacity of the eastern channel between this development proposal and the proposed modification work for Sydney Metro Trains Facility South. **Sydney Metro has a proposal to modify the current alignment of the eastern channel (adjacent to Sydenham Basin) and divert flows from its modification area into the eastern channel. This may utilise the available capacity of this Channel and there may be limited capacity to accommodate flows from the Carrington Road site. Consultation will be required with Sydney Metro to determine the capacity of the eastern channel to accommodate this drainage.**
- (iii) **The flood report needs to make clear what has been modelled as the 'proposed case' in a diagram showing this along with provision of information on proposed storages. The following discrepancies between what is shown in the drawings and the various parts of the report need to be corrected:**
- a. The civil master plan drawings show a 1800x1200 culvert in Carrington Road which conflicts with the information on Sydney Water DBYD which shows a 1500x1200.
 - b. Figure 9 of the Civil Report is different to drawing SKC066; SKC066 shows no culvert in Carrington Road
- (iv) The current arrangement presents a risk of flows back flowing from the eastern channel into the central channel system should the non-return valve fail, which invariably it will. Reliance on back flow devices should be avoided as these are prone to failure.

- (v) The flood report needs to address impacts in upstream and downstream areas, specifically areas north and north east of the rail line which drain to the central channel including Fraser and Tillman Park and Sydenham Industrial area.
- (vi) Internal drainage infrastructure needs to be shown on the civil master plan drawings.
- (vii) Floor levels must be specified in the report.
- (viii) Floor levels of buildings and infrastructure at the northern end of Carrington Road should be designed to enable future raising of Carrington Road from the end to Schwebel Street.
- (ix) Development must comply with the flood controls in Part 2.22 of Marrickville Development Control Plan (MDCP) 2011 in terms of floor levels and protection of underground parking. Councils current Flood Planning Level for the site is RL 3.33 metres AHD;
- (x) The Cooks River Probable Maximum Flood (ie RL 5.4 metres AHD) should be used to assess flood risk and a Flood Emergency Response Plan needs to be provided (refer to Controls C22, C23 and C24 of Part 2.22 of the MDCP 2011);
- (xi) The report must make clear how the existing heritage buildings will be protected from flooding as their existing floor levels are well below the 1 in 100 year Flood Planning Level.
- (xii) The proposed upgrade of the central channel should continue through to the Sydney Water pumping station in Mackey Park and the upgrading of the pumps should be addressed to provide a better level of flood protection in Carrington Road;
- (xiii) Address all of the recommendations of the Cooks River Floodplain Risk Management Study and Plan (2015) in regards to Carrington Road including:
 - a. Backflow protection on the western channel;
 - b. Survey of the east bank of the western channel and raising the bank to an equivalent level to the river bank levee;
 - c. An audit to determine the potential for failure of the Mackey Park levee due to the presence of trees on the embankment; and
 - d. A study evaluating raising the levee to provide additional protection to the site.
- (xiv) In light of the issues above, the proposal and the flood study do not currently adequately address the S.117 Direction - 4.3 Flood Prone Land that must be complied with. Inconsistencies will only be considered where they are of minor significance or the Planning Proposal is in accordance with a floodplain risk management plan.
- (xv) The proposed wetland area at the northern end of Carrington Road appears to cut through 5 Carrington Road. This requires clarification.
- (xvi) The proposal should incorporate Water Sensitive Urban Design elements throughout including rainwater and stormwater reuse and creation of wetlands and naturalised drainage systems where possible. The drainage system between the northern end of Carrington Road and approximately Building 14, running adjacent to the railway land, should be designed as a natural watercourse. Water from all buildings be collected in rainwater tanks and reused on site.
- (xvii) The infrastructure report has not investigated the options for water sensitive practices for the development site. There are opportunities to integrate water

sensitive infrastructure and facilities to improve the liveability of the development site. The development site will be a very good case study for the CRC for Water Sensitive Cities to investigate these water management options as part of its Integrated Research Project 4 which will be evaluating a number of infill development sites under an adopted framework across Australia. The proponent should participate in this research, as it will generate valuable feedback to improve the liveability of the development in relation to water management, local microclimate and thermal comfort.

- (xviii) In relation to the drainage infrastructure report, pages 6, 7 and 12 indicate that the assessment of the flooding conditions has been made using a 100 Year ARI design rainfall event plus 30% increase of rainfall and sea level rise (SLR) of 0.4 metres and 0.9 metres. There is no requirement from MDCP 2011 to include 30% increase of rainfall and 0.9 metres SLR. The flood planning level needs to be based on a 100 Year ARI design rainfall event plus 0.4 metres SLR and 0.5 metres freeboard. Section 4 (page 11) of the report outlines the requirements correctly as per MDCP 2011. These details need to be clarified from the proponent and included in a revised report.
- (xix) The drainage report for the Planning Proposal needs to be extended to address the cumulative drainage impacts when other development proposals and infrastructure works in the upstream portion of the Eastern Channel Catchment are taken into consideration. The drainage solution presented in the report must take account of local conditions and development activities at a regional (or catchment) level. In addition, Inner West Council is currently being involved in the development of floodplain risk management plan for Marrickville Valley which includes the Eastern Channel Catchment. All these factors need to be investigated when considering the flow diversion option from the development site into the eastern channel.

6. Urban Forest, Trees and Landscaping

- (i) **An urban forest canopy of at least 35 percent should be provided** consistent with *Sustainability Priority 7: Protect*, enhance and extend the urban canopy of the Draft Central District Plan, and also the Marrickville Urban Forest Strategy and Community Strategic Plan. The submitted site plan reflects what would likely be a 10 to 15% urban forest canopy.

Achieving good canopy cover over the site benefits the owners and developers as well as future occupiers by mitigating urban heat island effect, reducing energy consumption, stormwater runoff, flood impacts, improved air quality and amenity.

- (ii) Green infrastructure needs to be planned for and designed in conjunction with grey infrastructure and be part of the vision.
- (iii) **A preliminary tree assessment including an audit is to be undertaken for existing trees on the site to determine trees with high retention value that warrant protection as part of the future development and use of the site. The palms along Carrington Road and the trees in front of heritage building in Carrington Road need to be retained on heritage grounds and due to the habitat they provide for protected native species. Consideration should be given to replacement infill planting and succession planting for this palm avenue.**

7. Affordable Housing

Council's Affordable Housing Policy (AHP) must be applied to the Carrington Road redevelopment site, with the proposal providing a 15% affordable housing contribution in compliance with Councils policy. The planning proposal's total residential yield of 2,616 units, an estimation of the affordable housing contribution in keeping with the AHP would be 392 dwellings.

One of the primary characteristics of the Marrickville area has been the diversity of the resident population. This development represents a significant opportunity to retain that character by ensuring a significant proportion and diversity of the proposed dwellings be allocated to affordable housing.

- On page 22 of the *Planning Proposal Report (Report)*, reference is made to Action 2.3.3 'Deliver more opportunities for affordable housing' in *A Plan for Growing Sydney*. In particular the *Report* notes that the State government "recognises that more needs to be done to meet the housing needs of people on very low, low and moderate incomes. People in lower income brackets that spend more than 30% of their gross income on rent are said to be experiencing 'rental stress'". The *Report* then states that the proposal "will contribute to housing choice by increasing supply and importantly committing to the provision of affordable housing and first home buyer incentives, a substantial social benefit. No evidence is provided to justify this statement.
- No details are given as to how the proposal will deliver affordable housing for very low to moderate income households and what the affordable housing contribution is. No affordable housing contribution has been nominated.
- Further into the *Report*, reference is made to the Greater Sydney Commission draft Central District Plan and 'Liveability Priority 3: Implement the Affordable Rental Housing Target'. The *Report* notes that the draft Central District Plan recommends that for new urban renewal precincts a target of 5% to 10% of new floor space being dedicated as affordable housing is appropriate. In response, however, the *Report* states that "given the scale of the proposed development, this would represent a significant and uneconomical provision of affordable housing." (Emphasis added page 27). So while the *Report* claims that it is "consistent" with the provision of more affordable housing as defined above, it then claims that providing an affordable housing contribution, within the 5% to 10% range stipulated by the Central District Plan, is decidedly "uneconomical". **No evidence is supplied to support this claim. Council requires the proponents Development Feasibility study for peer review and to confirm the validity of this claim.** Given the scale of the proposed development and the re-zoning of industrial land, affordable housing should be economically feasible.

8. Recreation Impacts and Open Space

The Sydenham to Bankstown Corridor Strategy (Strategy) requires the provision of a large area of public open space along the railway line and an easily accessible centrally located park that is easily accessible to residents, in 15% of the total Carrington Road precinct area (refer to Strategic Intent for the Marrickville Precinct (page 20/21 of the Strategy). Council seeks an increase in the provision of open space and cycle and pedestrian links over railway lines. Measure O2 in the Strategy states that new open space is to be delivered as works in kind by developers (page 32). **The provision of open space is to constitute at least 15% of the total site area. This is in addition to and above the ADG requirement for 25% communal open space on the site to serve the proposed new residents of the development.**

The location of the open space in the Planning Proposal differs from that shown in the Strategy (page 30 Chapter 3). **Cycle and pedestrian corridors are thoroughfares and should not be calculated towards the 15% provision of open space as they are a passive transport corridor that reduces the area available for active and passive open space.**

With regard to the public domain contribution and the open space proposed it is unclear of what the size of each distinct public space area is (for example Carrington Park; Carrington Park/Play; Grove Square) and these details must be given and details of exactly what this consists of and whether they are active or passive spaces. Further it appears that the Wetlands and Creek public domain works are located outside of the site boundaries and details of the adjoining land owners consent needs to be provided for these proposed works.

The Planning Proposal objective and intended outcome "To provide ample landscaped open space areas for the enjoyment of residents, workers and the surrounding community" is misleading. **Both active and passive open space areas are required as part of this redevelopment and not just formal landscaped areas.**

The following matters must also be addressed in the revised Planning Proposal:

- (i) Connectivity – the proposed increased density of population in a relatively small area is significant. The proposed connectivity to the northern end of the development across State Government owned land through to Fraser Park will improve the permeability for pedestrians and cyclists in the locality. **This element of the development must create a pedestrian and cycling link to Sydenham Station that is accessible, well lit and has good passive surveillance so it is safe for community use all year round.**
- (ii) Access across Richardson Crescent - the proposed connection to Mackey Park is critical as this will be used by people to get to Mackey Park and to Tempe Station. **More detail on the treatment of the access points is required to ensure there is evident and safe egress at the southern end of the development to Mackey Park and the Cooks River.**

This new connection required from the site across to Mackey Park would be consistent with the Draft Central District Plans vision for a Green Grid that links with the Cooks River riverfront. The connection should be extended from the Carrington Road edge of the site which is the most linear path and direct route (currently the planning proposal shows a building on this corner frontage).

- (iii) **Impact on Mackey Park** - Mackey Park is home to one of the largest sporting clubs in the locality and used by many local schools. It is currently operating at maximum capacity for much of the year and notably from March through September (see image below from 2 July 2017 noting the visible wear on Mackey Park compared to adjacent sportsgrounds in Canterbury Bankstown). With the proposed increase in population, there is strong likelihood of increased pressure on the facilities at Mackey Park and consequently **the proposed development must provide additional opportunities for active and organised recreation for children, young people and adults.** Such options might include natural or synthetic turf facilities which can be used for training (i.e. with lighting) and possibly matchplay.



- (iv) The solar access diagrams show unacceptable overshadowing of Mackey Park over a number of hours in the morning. Given its high level of usage this overshadowing will adversely impact on the field and its recreational activities. The Planning Proposal page 43 states that approximately 39% of the park is overshadowed... is substantially and rapidly reduced after this time, with shadows quickly moving eastward and becoming smaller in scale. By 11.00am, the park is in full sun again and remains so throughout the rest of the

day. Full solar access must be maintained to Mackey Park consistent with the revised Sydenham to Bankstown Strategy community feedback.

9. Creative Industries

Creative industries and culture are essential to the inner west's community and identity. In the 2011 Census of Population and Housing, the Inner West Council LGA showed marked specialisations and concentration for people working in the creative and cultural industries - 9.4% or 8,685 people in the Inner West Council area are employed in cultural occupations – the highest level in NSW. The Inner West Council area has clear creative industries specialisations in a number of areas. Using Census data indicators, it is clear these specialisations are outstanding – a specialisation is usually considered a data quotient above 2.

Council's Cultural Action Plan (2016 – 2020) identified that arts and culture are integral to local social and economic advantage and the liveability of the area. The Action Plan also detailed that the most critical need for the local creative community has access to diverse, affordable spaces to produce and present work.

A number of factors are challenging artists' ability to access affordable spaces in the local area. These include gentrification and a loss of industrial spaces, which will be heightened by proposed land zoning changes in the Sydenham to Bankstown Urban Renewal corridor and Victoria Road Marrickville. In particular there is a shortage of, larger style industrial 'bare bones' warehouses, suitable for hybrid and large scale production, such as sculpture and large scale visual arts.

Council's economic and cultural mapping indicate that the site of the proposed Carrington Road development is one of the highest density areas of creative production in the Inner West local government area. This is confirmed by the Made in Marrickville study. The site currently incorporates large collective spaces where a number of artists produce and incubate work in close proximity to other artists and arts organisations. This is a driver for local innovation and clustering of creative industries.

Given the nature of dense and specialised creative industries occupying the site, the following issues must be addressed in the Planning Proposal:

- (i) The Planning Proposal cites the Marrickville Employment Lands Study Review 2014 (MELS 2014) as a Council Strategy that supports Carrington Road as suitable for rezoning, as demand for industrial spaces is declining. However, as the response (point 1 of this letter) from Council's Economic Development officers notes, there is a demonstrated shortage of industrial lands, exacerbated further by other land rezoning proposals in the area
- (ii) The Proposal's reference to declining traditional manufacturing and the emergence of urban firms (p. 31) should consider the flexible practices of creative industries. Council's cultural mapping and consultation suggest that there is not a clear distinction between manufacturing, niche creative production, local individual artists and small to medium creative enterprises. For example, the area houses a number of artists involved in creative design and experimentation (such as ceramics and sculpture), who might then produce items for sale in small to medium manufacturing and may also run community programs. In light of this, the distinction between Professionals, Blue Collar and Community Services workers (Appendix 4) is also a grey area in regards to the creative industries in the area
- (iii) Affordability of creative spaces is a key issue. Newly built creative spaces at market rent are generally unaffordable for the area's specialised artists and makers. **This issue must be addressed in the Planning Proposal.**
- (iv) The Proposal states that the development will retain and grow creative industries (**page 39 of the Planning Proposal Report**) but the Planning Proposal does not retain affordable larger spaces, suitable for noise generation and custom large scale and hybrid production, as well as co-located art studios. **The response that existing business space would be**

25

retained (page 39 of the Planning Proposal Report) needs to take into account the affordability and suitability of any future spaces for existing creative industries. Details of the existing floor space used by all creative industries on the site and the proposed floor space provision and type of provision for creative uses must be included in this Planning Proposal.

- (v) The proposal notes developments could explore design responses for 'work from home' dwellings. Any live/ work options for artists should intersect with affordable housing considerations, as live/ work options at market rent will attract only certain sectors of the creative industries, and not necessarily niche industry specialisations of the Inner West
- (vi) The Greater Sydney Commission's Central District Plan (4.7.2) details the importance of arts and culture for connected communities and vibrant public places and states that; "Arts and cultural policy, investment and actions should be well integrated into urban development. This can be achieved through planning proposals for urban renewal areas and priority precincts..." Similarly, A Plan for Growing Sydney the metropolitan plan Direction 3.4 aims to 'Promote Sydney's heritage, arts and culture'.
- (vii) As a high density precinct of niche creative industries, the Carrington Road area is an important element of the overall cultural ecology of the Inner West and Greater Sydney that needs to be nurtured. The Commission also describes the importance of night-time economies and live music, which is also a specialisation of the inner west.
- (viii) The draft Sydenham to Bankstown Corridor Strategy states its vision for Sydenham precinct as "a creative and dynamic centre that increases and diversifies employment opportunities with new and exciting businesses and industries, cafes, bars, restaurants and venues for live music." The local IN1 General Industrial lands allow live music venues but there is only one established live music venue in the area. **If the State Government's renewal vision for Sydenham is to be realised, targeted support for live music industries should be considered in the Planning Proposal.**

If the east Marrickville/Sydenham area is to remain a hub of flourishing creative industries, known for its specialisations in the arts, such as sculpture, painting, theatre, making, and music, access to suitable affordable spaces must be taken seriously. **The proposal must meet the needs of niche creative industries in a variety of ways including:**

- (i) **purpose built studio spaces to be offered at low cost to artists possibly managed by Council. These would need to include a number of studios co-located, suitable for noise generation and creative co-production**
- (ii) **affordable large scale spaces suitable for larger scale production, hybrid creative industries and niche creative industries**
- (iii) **measures to support the State Government's vision for flourishing live music in Sydenham such as funds for new venues in the area possibly distributed by Council**
- (iv) **noise remediation measures, including sound proofing for new residential developments, where nearby creative uses and spaces may generate noise**
- (v) **Affordability controls on any creative spaces in the Carrington Road area is a key issue that must be addressed – without these, the existing niche creative industries will be pushed out of the area. Council requires that the affordable 'incubation spaces' envisioned in and around this precinct are maintained in perpetuity as part of a Voluntary Planning Agreement (VPA).**

10. Environmental, Biodiversity, Water Sensitive Urban Design and Sustainability Impacts

- (i) The redevelopment of this site presents a unique opportunity to achieve environmentally sustainable development. **The Planning Proposal should emulate examples of WestWyck ecovillage best practise zero net emissions developments for example**

26

the One Planet Living initiative in Melbourne's Brunswick, that goes beyond the 5 Green Star rating.

- (ii) The Marrickville Road and Sydenham Station areas are an established Urban Heat Island. High density development could increase temperatures at the street-scale. **The proposal needs to incorporate substantial landscaped areas, especially shade trees, with recycled / rainwater-fed irrigation to mitigate the Urban Heat Island effect.** Please refer to Councils Urban Forest Policy and Strategy comments in Section 6 above.
- (iii) This proposed precinct is adjacent to the area mapped in the Marrickville Local Environmental Plan (MLEP) 2011 Natural Resources – Biodiversity map. This area identifies a wildlife corridor along the Cooks River. The control in MDCP 2011 for this area is that any landscaping plans should include predominantly native vegetation local to the Sydney basin. An indicative list of this vegetation is found in Part 2.18 - Landscaping of the MDCP 2011. This is further supported by the Marrickville Biodiversity Strategy 2011-2021 which identifies Priority Biodiversity Areas for opportunities to enhance existing biodiversity and opportunities to connect other areas locally and regionally. This precinct is part of what is referred to as the Urban Habitat Mosaic, and the proposal has the potential to increase biodiversity and connectivity of habitat between two other Priority Biodiversity Areas (the Cooks River corridor to the south and Fraser Park & Tillman Park to the north) by providing not only public open space as parkland with an urban forest but areas of denser vegetation, particularly around any naturalised water course or water body in recognition of the area being the former Gumbramorra Swamp. This precinct is also adjacent to land classified as 'Supporting Habitats' and 'Supporting Areas' through the [Connected Corridors for Biodiversity Mapping](#) coordinated by Greater Sydney Local Land Services. The Planning Proposal must recognise this and improve habitat connectivity across the site.
- (iv) The Draft Central District Plan cites the Cooks River Open Space Corridor that will extend to the south of the proposed development site, and the Cooks River foreshore is part of the Cooks River Biodiversity Corridor shown in the MLEP2011 Natural Resources – Biodiversity map. **Therefore, the Planning Proposal Part 1: Objectives and Intended Outcomes (page 19 of the Planning Proposal Report), must add a new objective:**
 - **To provide native natural areas that create a link to the Cooks River Biodiversity Corridor.**
- (v) The Canary Island Date Palms adjacent to the site are part of the heritage industrial streetscape listing and a habitat for nesting Australian White Ibis (*Threskiornis molucca*) protected under the NSW National Parks and Wildlife Act 1974. The Office of Environment & Heritage Australian White Ibis Management Plan 2010 aims to provide permanent refuge population and habitats in the Sydney basin. **This row of Date Palms along Carrington Road is one of two main Ibis colonies in Marrickville and must be protected by the urban design for development on the Carrington Road interface.**
- (vi) ARUP's Sustainability report has scant detail but provides statements of best practice on which to build. A [Water Sensitive Cities](#) approach should be taken in the planning and design of this site by:
 - a. adding to the 'Green Grid', Blue-Green Grid,' with water sensitive design integrated into the landscape and building design process and not designed as separate functions.
 - b. Carrington Park and Park Play should be designed with multifunctional spaces for recreation, native habitat, flood detention (similar to Marrickville Oval), Water Sensitive Urban Design (WSUD) (treatment and rainwater and sewerage recycling) and local food production.
 - c. Taking a 'design led' approach as supported by the Draft Central District Plan and Towards our Greater Sydney 2056, it is recommended that Council and the

27

Developer co-design a workshop with the proponent, Council, consultants from relevant disciplines to create a world's best practice site.

- (vii) Under the current Coastal Management Reforms, mapping of coastal areas and protected areas is being done. Draft mapping indicates that the new State Environmental Planning Policy (SEPP) (combining SEPP Nos 14, 26, 71) may be relevant to the location so may need to be considered in future. The Planning Proposal must therefore be assessed against S117 Ministerial Directions 2.1 and 2.2.
- (viii) Consider recycling sewage (i.e. internal non-potable uses and/or irrigation including for Mackey Park) as part of its WSUD strategy.
- (ix) In reference to the Pells Sullivan Meynick - *Geotechnical Advice for Planning Proposal*, 5.5 Construction Dewatering must be reinjected onsite and if it must be pumped off-site to enter into Cooks River or other waterway, it must be treated to achieve the Botany Bay Water Quality Improvement Plan standards. This needs to be confirmed in the Planning Proposal.
- (x) Provide a water quality report that considers stormwater drainage and runoff particularly given the proximity to the creek and Cooks River and impact of acid sulphate soils. There are significant hard paved impervious areas proposed for example paved public open space of 21,194m² (27% of the site) and internal streets of 6,090m² (8% of the site), and unfiltered runoff will impact on water quality of adjacent creeks and ultimately the Cooks River and Botany Bay. A water quality report that mitigates and addresses this must be submitted. This is consistent with the Draft Central District Plan Priority 5.3 to Protect the Districts Waterways and Marrickville Urban Strategy.
- (xi) Liveability, Sustainability and Resilience: Council seeks to implement a consistent approach across both urban renewal corridors in the Inner West being along Parramatta Road and the Sydenham to Bankstown Corridor. **Council supports the Strategic Actions described in Principles 4, 5 and 6 of the Parramatta Road Corridor Urban Renewal Strategy as guiding principles of the redevelopment of the Sydenham to Bankstown Urban Renewal Corridor.** This include the implementation of the '15 minute neighbourhood', provision of community infrastructure and facilities, design excellence, public domain guidelines, and built-form environmental sustainability targets. The proposal should demonstrate compliance to these planning principles.

11. Social and Cultural Impacts

No Social Impact Assessment (SIA) has been submitted with this Planning Proposal. **A SIA is required prior to progressing the Proposal to Council to address Section 55 of the Environmental Planning and Assessment Act that requires Planning Proposals to address the question "Has the Planning Proposal adequately addressed any social and economic effects?."** Further in line with the Draft Central District Plan Liveability Priority 11 "Provide socially and culturally appropriate infrastructure and Services", this needs to be informed by a SIA. The brief for this SIA should be agreed with Council.

12. Voluntary Planning Agreement

Planning agreements are invaluable mechanisms for addressing the impacts of developments and achieving important planning outcomes. They are particularly relevant to a proposal of this scale. A VPA for this site will help:

- mitigate the impact of development or compensate for the loss or damage caused by development;
- meet the new demand for public facilities and services created by development;

28

- prescribe the nature of development or introduce components of the development for the public benefit in accordance with planning policies;
- secure off-site planning benefits for the wider community so that the development delivers a net public benefit.

Council can receive asset contributions including affordable housing in accordance with the Council's AHP or to meet other local asset needs. Council can also receive monetary contributions through a planning agreement in order to allocate funds for expansion of local public facilities and services. Public infrastructure and services improvements fall into the following categories:

- community facilities such as halls and meeting rooms, child care centres, libraries, health centres;
- open space and recreation facilities;
- public domain improvements;
- affordable housing; and
- public car parking, traffic management facilities and road works.

The proponent should take this opportunity to address the impacts of the development through a planning agreement to satisfy the significant increased demands it would generate for public infrastructure and services.

The proponent should contact the Department of Education and agree how educational needs could be delivered as part of the Planning Proposal and related VPA.

13. Waste Management

The Planning Proposal must provide reference on how waste and recycling would be managed. MDCP 2011 requirements should be addressed including (but not limited to) ensuring roadways are accessible and load rated, waste rooms are at street level, separate commercial and residential waste rooms, bulky waste storage areas are provided etc. Minimising waste from building demolition and reusing materials should also be addressed. Council recommends modelling waste management on the Barangaroo development provisions for commercial properties.

14. Contamination

The site has a history of commercial/industrial uses and most notably automotive manufacturing. The contamination issues identified in the proponents Preliminary Site Investigation are:

- Soils consisting of fill and natural soils identified to be impacted with heavy metals, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons and asbestos.
- Groundwater impacted by volatile organic compounds, TPH, ammonia and phase separated hydrocarbons
- Former underground storage tanks or fuel/drum storage areas require further assessment and remediation
- VOCs present in sub-slab vapour of the northern portion and possibly the southern portion of the site that requires further investigation and possible management or remediation
- A number of data gaps remain at the site that require further investigation
- Based on a number of investigations, the site is considered contaminated for the proposed uses, however the Preliminary Site Investigation concludes that the site can be made suitable subject to appropriate management and remediation.
 - Additional assessments will be required prior to the lodgement of Development Applications should this planning proposal progress including remedial action and environmental plans, and an interim/final Site Audit Statement to ensure site remediation proposed is suitable for the proposed land uses as required.

29

15. Additional Matters

- The Planning Proposal Part 3 Justification, Section B Relationship to Strategic Planning Framework must also now address the new policy document titled *Directions for a Greater Sydney 2017 – 2056* and its 10 principles.
- The EIA Industrial Lands Strategic Assessment Checklist responses 12 and 13 on page 36 need to be revisited and adequately addressed. Response 12 on whether there is a compelling argument that the industrial land cannot be used for an industrial purpose now refers to limited truck access and the site's flood affectation as reasons it cannot be used for industry. This is not considered an adequate response. Response 13 in the EIA refers to the land being identified for alternative purposes and this response misrepresents the MELS 2014 that also identified the site as suitable for industrial uses and no industrial uses are proposed to be retained.
- The Wind Impact Assessment (Appendix 6) recommends wind-tunnel testing to quantify the wind conditions around the site. This detail must be supplied because this planning proposals requests amendments to height and FSR controls. The outcome of such amended development standards could be a built form with unacceptable wind impacts. Also the wind impacts on the public domain and at street level where retail uses/outdoor dining is envisioned should be detailed.
- Part 9.44 of MDCP 2011 be amended and accompanied by a Masterplan.
- Details of how potential land use conflicts in a mix of industrial, office, retail, residential uses and public through site links must also be addressed. This issue must also be addressed in relation to the interface between proposed new uses on the site and the existing cluster of industrial uses on the western side of Carrington Road. Further the introduction of new uses in proximity to the freight line and also in proximity to the flights paths both of which are significant noise sources are likely to raise significant land use conflicts that have not been adequately addressed in the Planning Proposal.
- Details of how Crime Prevention through Environmental Design principles will be addressed.
- A retail impact assessment of the Planning Proposal must be provided in view of the retail provision on the site and potential impact on Marrickville Road and Marrickville Metro retail centres.
- Consistency with S.117 Directions.
- Further details are required to address S.117 Direction 3.4 Integrating Land Use and Transport, considering RMS advice that the proposal is premature and should be deferred pending the adoption of the Sydenham to Bankstown Strategy.
- The references on page 40 of the Planning Proposal to the Industrial Lands Strategic Assessment checklist contain a number of misleading statements that should be rectified namely the contribution to employment clusters that encompass industrial land to the west, how the proposal complements the adjacent industrial precinct and (does not introduce land use conflicts), and does not impact on the area's ability to meet future demand for industrial land.
- A Net community benefit test must be provided as per the Departments Guide to Preparing Planning Proposals.
- Please note that the Marrickville LEP 2011 R4 High Density Zone Objectives that state:
 - To provide for office premises but only as part of the conversion of existing industrial and warehouse buildings or in existing buildings designed and constructed for commercial purposes.
 - To provide for retail premises in existing buildings designed and constructed for commercial purposes.
- All commercial/retail development would need to be in the proposed B2 zone, otherwise a new LEP local provision or additional permitted use would be required. It

30

is noted that the indicative ground floor plan in the urban design report shows commercial and retail uses in the R4 residential zone.

- The Planning Proposal Section A need for the proposal under the justification *Is the planning proposal a result of any strategic study or report?* is misleading as it references the Marrickville Employment Lands study and identifies that the site could be rezoned. It fails to mention that Action 4.1 of the study considered Carrington Road precinct as an opportunity for urban renewal with a combination of industrial and residential. Similarly, this justification selectively references the *draft Sydenham to Bankstown Corridor Strategy* that also requires retention of light industrial uses that is not accommodated for in the current Planning Proposal. **These inconsistencies must be addressed in the Planning Proposal.**
- The Planning Proposal refers to the Draft Central District Plan Liveability Priority/Action to encourage housing diversity and states that “The rezoning will encourage housing diversity as it will provide a range of housing types”. **Details of the range of housing types and the unit mix must be provided to determine consistency with this action, especially as it appears that most of the proposed housing is high density apartments.**
- The Planning Proposal refers to the Strategic Merit Test - Assessment Criteria on page 30 and states that it is consistent with criteria a). However, it is currently not consistent with the precautionary approach to rezoning of industrial lands in the Draft Central District Plan or with the Sydenham to Bankstown Strategy vision to retain light industrial uses on this site or the vision for the site as medium-high density residential development of up to eight storeys. The Hill PDA 2015 Industrial Precinct Review prepared to inform the Department of Planning’s draft Central District Plan has not been referenced in the Planning Proposal of which the Tempe, Carrington Road industrial area scores above average (10.5) in the health check.
- The Planning Proposal must demonstrate consistency with the Draft Central District Plan and the *draft Sydenham to Bankstown Corridor Strategy*. It must also assess how it would fit with the Hill PDA 2015 Industrial Precinct Review.
- The Proposal does not adequately address item B, point 2 of the site specific merit test “does the proposal have site-specific merit, having regard to the following... the existing uses, approved uses and likely future uses of land in the vicinity”. The proposal fails to mention any of the existing uses and approved uses including industrial and creative industries that contribute to the unique identity and character of the former Marrickville LGA.
- Towards our Greater Sydney 2056 aim to support key industrial precincts with appropriate planning controls. A productivity priority is the 30 minute city. **The proposal does not retain any industrial land/floor space and is inconsistent with this priority. It must provide an evidence based approach to how the Planning Proposal will address this priority.**
- **Council will require reimbursement of costs for engaging consultants to undertake peer reviews of the following matters in accordance with Fees and charges:**
 - Economic Impact Assessment peer review and a Retail Impact Assessment;
 - Urban design analysis and existing character assessment of the Precinct, the development of site specific design principles and to peer-review the master plan;
 - A Precinct Wide Traffic Study; and
 - The proponents Development Feasibility study for an assessment of the affordable housing provision.