



DRAFT PLANNING PROPOSAL

11 – 11A Edinburgh Road, Marrickville

Prepared for
NATIONAL STORAGE
November 2024



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Associate Director Danielle Blakely
Consultant Zachary Quintal
Project Code P0040147
Report Number FINAL

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EXECUTIVE SUMMARY

This Draft Planning Proposal has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of National Storage in support of a proposed amendment to the *Inner West Local Environmental Plan 2022 (IWLEP 2022)*.

The Draft Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)* and the Department of Planning and Environment (**DPE**) *Local Environmental Plan Making Guideline (the LEP Guideline)* dated August 2023.

The following table outlines the key components of the proposed plan amendment including the relevant requirements listed in Section 2 of the LEP Guideline.

Table 1 Key Components

Item	Description
Site Address	11 and 11A Edinburgh Road, Marrickville NSW 2204
Legal Description	Lot 1 in DP607677 and Lot 67 in DP4991
Existing Planning Controls	<p><i>Inner West Local Environmental Plan 2022</i></p> <ul style="list-style-type: none"> ▪ Land use Zone: E4 General Industrial ▪ Height of Building: N/A ▪ Floor Space Ratio: 0.95:1
Proposed Amendments	<p>The Draft Planning Proposal seeks to include the following additional clause in Part 6 of the IWLEP 2022 that permits:</p> <ul style="list-style-type: none"> ▪ the building on Lot 1 in DP607677 and Lot 67 in DP4991 to exceed the floor space ratio by an amount no greater than 2.25:1 if the building is used for self-storage units. ▪ redevelopment on Lot 1 in DP607677 and Lot 67 in DP4991 to provide a minimum of 7.5% of the site area as deep soil area <p>In addition, the Planning Proposal seeks to introduce a building height control of 30m (RL34.53) across the site.</p>
Technical Studies	<p>The Draft Planning Proposal has been informed by the following technical documents and studies:</p> <ul style="list-style-type: none"> ▪ Indicative Concept Architectural Plans prepared by HAL Architects ▪ Urban Design Report prepared by HAL Architects ▪ Preliminary Flood Assessment prepared by Hydrostorm Consulting ▪ Preliminary Traffic Impact Assessment prepared by Ason Group ▪ Acid Sulfate Soils Assessment prepared by Martens ▪ Geotechnical Assessment prepared by Martens ▪ Strategic Positioning Paper prepared by Urbis

The Draft Planning Proposal has been subject to a rigorous assessment process which demonstrates that the proposed amendments to Part 6 of the IWLEP 2022 are entirely appropriate and justified based on the following matters:

Strategic Merit

- The Draft Planning Proposal gives effect to the *Greater Sydney Region Plan* and the *Eastern City District Plan* and is consistent with the *Our Place Inner West: Local Strategic Planning Statement*, *Our Inner West 2036: Community Strategic Plan* and *Inner West Employment and Retail Lands Strategy*
- The site is located in proximity to the Sydney CBD, Sydney Airport and Port Botany which are major logistics hubs as well as the growing residential population within the Inner West which has recently seen housing growth in medium density residential dwelling. The proposal will provide key storage facilities which can support the increased residential population and surrounding businesses, as well as last-mile storage for operators within the Inner West and Inner Sydney.
- The proposal will support the retention, management and support ongoing viability for the industrial lands within the Eastern City District and generate additional employment opportunities during construction and operation within an accessible location.
- The proposal will support the growing demand for additional storage floor space close to Sydney Airport, Port Botany and the Sydney CBD, and time sensitive and last mile distribution across the eastern and south-eastern suburbs of Sydney.
- The proposed amendments to Part 6 of the IWLEP 2022 will allow for increased FSR and building height to support self-storage units on the site only and not to other industrial land uses which may cause adverse environmental impacts to the surrounding area.
- The proposed inclusion of the deep soil planting on the site will reduce any potential urban heat impacts and provide adequate landscaping and tree canopy cover in accordance with the NSW Government's Greener Neighbourhoods Guide.
- The Draft Planning Proposal is aligned with existing strategic policy and does not rely upon a change in circumstances that has not been recognised by the existing strategic planning framework.

Site-Specific Merit

- Indicative concept designs prepared for the increased 2.25:1 control to the FSR control for the site solely for use as self-storage units demonstrate that the increase in FSR will be consistent with the evolving built form character of the Marrickville Industrial area, particularly recently completed or approved developments surrounding the site including the Marrickville Metro and the approved Woolworths Customer Fulfilment Centre.
- Indicative concept designs prepared for the building height control of 30m (RL34.53) will be consistent with the evolving built form character of the Marrickville Industrial area, particularly recently completed or approved developments surrounding the site including the Marrickville Metro expansion and the approved Woolworths Customer Fulfilment Centre both fronting Edinburgh Road.
- The site is located in proximity to Port Botany, Sydney Airport, Sydney CBD and the Inner West which are seeing growth in demand for additional storage floor space and time sensitive last mile distribution facilities across the eastern and south-eastern suburbs of Sydney
- The site is well-located to optimise recent major investments and upgrades in road transport infrastructure which enhance the connectivity of the site including the St Peters Interchange, M8 Motorway, and M4 and M5 Link Tunnels.
- The Draft Planning Proposal will result in positive social benefits through increased employment floor space within close proximity to public transport services including Sydenham and St Peters Railway Stations, and Sydney Metro upgrade of Sydenham Station.
- Future development of the site can be suitably accommodated within the surrounding transport network and will not adversely impact the surrounding road network.
- Whilst the site is identified as being flood prone land, appropriate mitigation measures can be implemented in the detailed design of future development of the site that would ensure future development of the site would not have an unreasonable flood impact.

- The site is located in an existing industrial precinct and will increase the floor space supported by the existing industrial zoned land.

Accordingly, as the proposal demonstrates both Strategic Merit and Site-Specific Merit it is **recommended** the Planning Proposal is endorsed by Council to enable a gateway determination by DPE.

1. INTRODUCTION

This Planning Proposal request has been prepared by Urbis Pty Ltd on behalf of National Storage (the proponent) in support of a proposed amendment to *Inner West Local Environmental Plan 2022 (IWLEP 2022)* at 11 and 11A Edinburgh Road, Marrickville. National Storage are a publicly listed company on the Australian Stock Exchange who operate over 200 facilities across Australia and New Zealand. National Storage purchased the site at 11-11A Edinburgh Road, Marrickville in August 2020 and took over the current self-storage operation in the building at 11 Edinburgh Road. The building at 11A Edinburgh Road currently operates as a smash repairs workshop. National Storage identified that there is significant capacity within the site to expand the existing self-storage offer to respond to market demand.

This Planning Proposal seeks to amend the planning controls under the IWLEP 2022 to achieve this outcome and expand the storage offer on the site.

1.1. VISION AND OBJECTIVES

The Draft Planning Proposal seeks to deliver critically needed industrial floor space in the form of self-storage close to Sydney Airport and Sydney Central Business District (**CBD**).

The key objectives of the Planning Proposal are:

- Support the growth of the Harbour CBD and Eastern Economic Corridor through delivering additional industrial floor space for use as self-storage space.
- Improve and increase the supply of self-storage space within the Inner West local government area (**LGA**)
- Preserve existing permitted land uses on the site to support long-term flexibility of employment land uses within the Sydenham-Marrickville Industrial Area.

Each of these matters is addressed in detail throughout this planning proposal report and technical deliverables demonstrating how the objectives will be realised through the Planning Proposal and future development.

1.2. PROPOSED PLAN AMENDMENTS

A Planning Proposal Request has been prepared in accordance with Section 3.33 of *the Environmental Planning and Assessment Act 1979 (EP&A Act)* and the Department of Planning and Environment (**DPE**) guidelines '*Local Environmental Plan Making Guidelines*' (**LEP Guidelines**) dated August 2023.

This Planning Proposal seeks to amend the IWLEP 2022 by including the following additional clauses in Part 6 to permit:

- building on Lot 1 in DP607677 and Lot 67 in DP4991 to exceed the floor space ratio by an amount no greater than 2.25:1 if the building is used for self-storage units.
- building on Lot 1 in DP607677 and Lot 67 in DP4991 to not exceed a maximum building height of 30m (RL34.53)
- redevelopment on Lot 1 in DP607677 and Lot 67 in DP4991 to provide a minimum of 7.5% of the site area as a deep soil area

No changes are proposed to the E4 General Industrial zone provisions which currently apply under the IWLEP 2022.

It is noted that no height control applies to the site and the proposed maximum building height for self-storage development will be 30 metres (RL34.53) which is below the Obstacle Limitation Surface (**OLS**) for Sydney Airport as it applies to the site. Report Structure

The Planning Proposal report is structured as follows:

- **Section 2:** detailed description of the site, the existing development and local and regional context.
- **Section 3:** pre-lodgement and Planning Proposal scoping background.

- **Section 4:** key features of the proposed Indicative Layout Plan which is intended to be delivered as an outcome of the Planning Proposal.
- **Section 5:** the existing statutory context of the site.
- **Section 6:** comprehensive description and assessment of the requested Planning Proposal in accordance with the DPE guidelines.
- **Section 7:** conclusion and justification.

1.3. PROJECT TEAM

This Planning Proposal has been prepared through significant collaboration with the project team and is supported by a range of technical inputs as shown in **Table 1** below.

Table 2 Planning Proposal Project Team

Technical Input	Consultant	Appendix
Indicative Concept Architectural Plans	Hayes Anderson Lynch Architects	Appendix A
Urban Design Report	Hayes Anderson Lynch Architects	Appendix B
Traffic Impact Assessment	Ason Group	Appendix C
Preliminary Flood Assessment	HydroStorm Consulting	Appendix D
Acid Sulfate Soils Assessment	Martens	Appendix E
Economic Strategic Positioning Paper	Urbis	Appendix F
Geotechnical Assessment	Martens	Appendix G
Proposed LEP Maps	Urbis	Appendix H

2. SITE CONTEXT

2.1. SITE DESCRIPTION

The land to which this Planning Proposal relates to is 11 and 11A Edinburgh Road, Marrickville as shown in Figure 1.

Figure 1 Aerial Photograph



Source: Urbis, 2023

The site is currently occupied by two 2-storey warehouse buildings with an at-grade loading area that is occupied by National Storage and a single storey building occupied by a Smash Repairs Workshop. The site has three street frontages being:

- a frontage to Edinburgh Road of approximately 94m
- a frontage to Smidmore Street of approximately 94m, and
- a frontage to Murray Street of approximately 67m.

The site and existing structures are illustrated in the site photography contained in Figure 2 below.

Figure 2 Site Photography



Picture 1 View of the 11A Edinburgh Road site from corner of Murray Street and Edinburgh Road

Source: Urbis, 2023



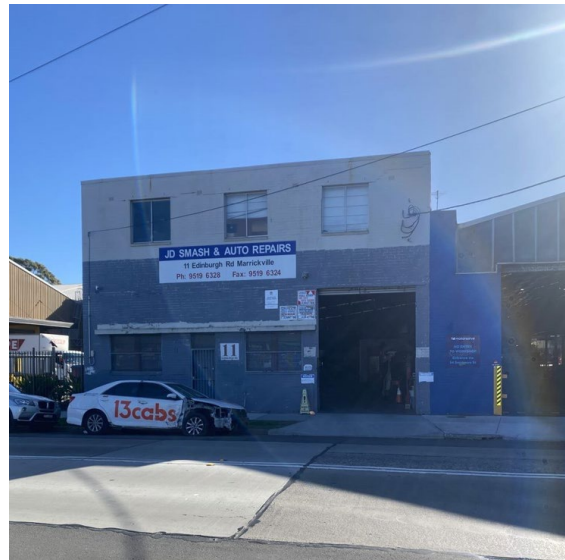
Picture 2 View of the sites from Edinburgh Road

Source: Urbis, 2023



Picture 3 View of the 11A Edinburgh Road site entrance at Edinburgh Road

Source: Urbis, 2023



Picture 4 View of the 11 Edinburgh Road site

Source: Urbis, 2023



Picture 5 View of the 11A Edinburgh Road site from Smidmore Street

Source: Urbis, 2023



Picture 6 View of the 11A Edinburgh Road site from the corner of Smidmore Street and Murray Street

Source: Urbis, 2023

The key features of the site, including the legal description, natural environment and built environment are summarised in Table 3.

Table 3 Site Description

Feature	Description
Street Address	11 and 11A Edinburgh Road, Marrickville NSW 2204
Legal Description	Lot 1 in DP607677 and Lot 67 in DP4991
Site Area	7,127m ²
Site Dimensions	94.6m x 73.2m
Easements and Restrictions	N/A
Site Topography	The site is relatively flat with levels varying across the site from approximately RL 4.5m AHD on the southern and western boundaries of the site and RL 5.7m AHD in the eastern and northern parts of the site.
Vegetation	There are no trees located on the site. However, there are trees within the Smidmore Street, Murray Street and Edinburgh Road setbacks.
Services and Utilities	The site is within an established industrial precinct and is connected to water, power, sewer and gas. The need to augment existing services and infrastructure will be reviewed as part of the detailed design of the development at the DA stage.
Hydrology	<p>The proposal site is 1.4km south-east of the Alexandria Canal which runs in a south-western direction until it merges with the Cooks River. The direction of groundwater flow at the site is likely towards these two main bodies of water.</p> <p>It is located in a floodplain and parts of the site would be impacted during a 1% Annual Exceedance Probability (AEP) event.</p>

Figure 3 Location Plan



Source: Urbis, 2023

2.2. LOCALITY CONTEXT

The site is located within the Sydenham Industrial precinct which is generally bound by Smidmore Street to the north, Railway Parade and the railway line to the east, Marrickville Road/the railway line to the south and Meeks Road/Farr Street/Shepherd Street to the west. The industrial precinct includes the following:

- Large free standing industrial buildings.
- Industrial estates including smaller individual warehouse buildings to the south and east.
- Manufacturing, freight and logistics uses and includes storage facilities, car smash repairs, warehousing and factories.

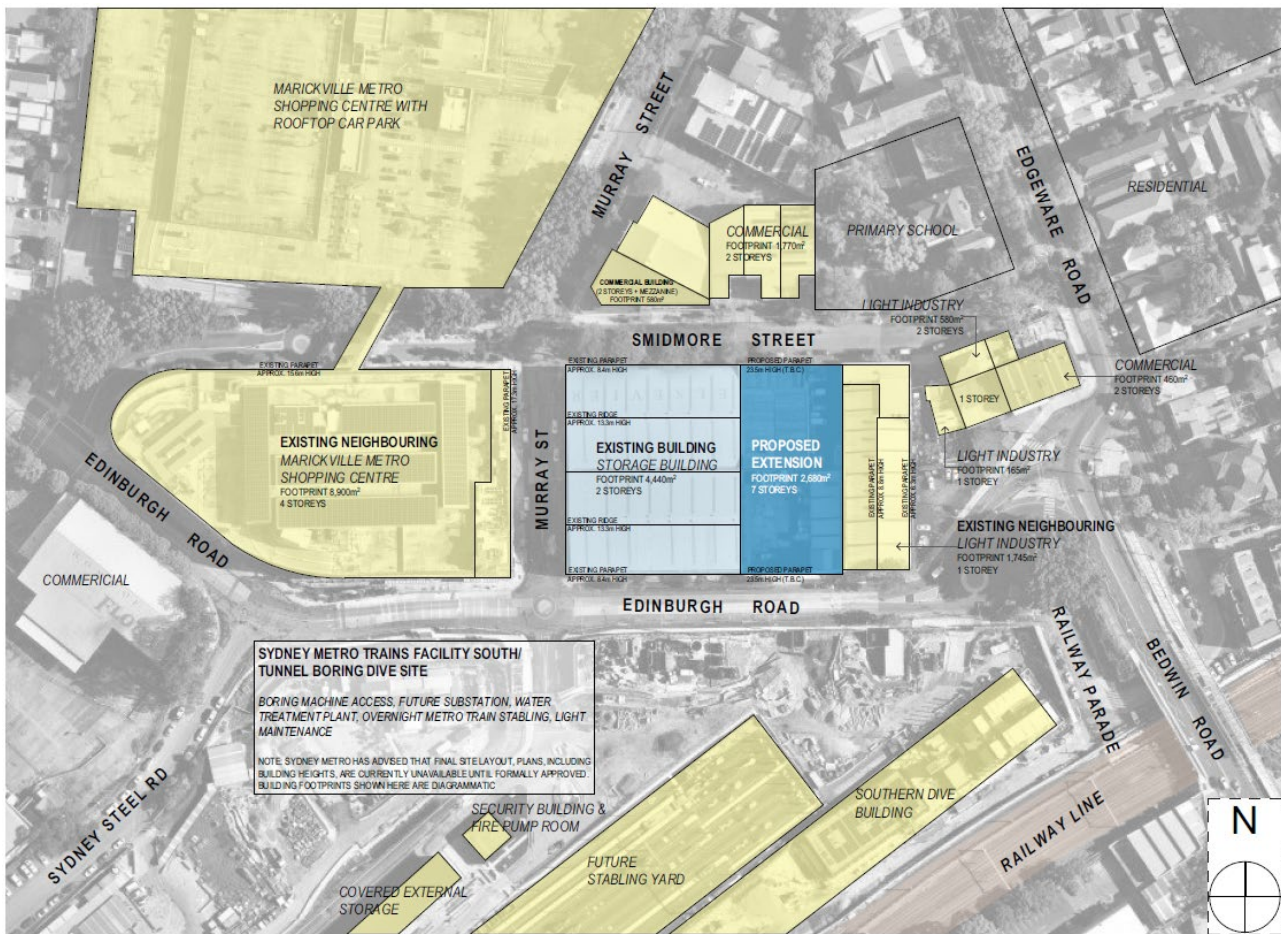
The Marrickville Metro Shopping Centre lies adjacent to the north and west of the site. It is a sub-regional shopping centre that is anchored by major tenants including Kmart, Woolworths, Aldi, and Coles and accommodates over 100 specialty stores including restaurants and food courts set across two sites. Access is provided via Murray Street and Smidmore Street with over 1,600 parking spaces being available across the two sites.

The Woolworths Customer Fulfilment Centre (SSD-10468) was recently approved for a two-storey warehouse and 7-storey office building. The Customer Fulfilment Centre will receive, store and dispatch online grocery orders for delivery to customers' homes. Vehicle access and egress during operation of the Customer Fulfilment Centre will be via one of four driveways on Sydney Steel Road and two driveways on Edinborough Road.

St Pius Primary School is located adjacent to the north of the site and the Sydney Metro Dive Tunnelling Site is located to the south-west of the site between Edinborough Road, Sydney Steel Road and the Railway Lines.

There is residential development located to the east and north of the site along Edgeware Road and to the west along Edinburgh Road and Bourne Street. The site is also located approximately 850m from St Peters Railway Station and 1.2km from Sydenham Railway Station.

Figure 4 Surrounding Development



Source: HAL, 2023

The expansion of the Marrickville Metro Shopping Centre to the site fronting Edinburgh Road (MP09_0191), and the recently approved Woolworths CFC at 74 Edinburgh Road (SSD-10468) establish a significant built form shift within the surrounding context. These developments accommodate forms of up to 32.32 metres and FSR of 1.39:1, plus a significant volume of hardstand and parking which do not attribute FSR. These developments provide key contextual urban design and character references for future redevelopment of the site.

The site is well serviced by road transport with frontages to Edinburgh Road and Smidmore Street. The site also benefits from its proximity to Princes Highway with it being 800m to the east of the site. As part of the Sydenham to Bankstown Metro Project, a future bike link connection along Sydney Steel Road and Edinburgh Road to Sydenham Station is being developed that will improve cycle and pedestrian access to the site.

The site is within the Inner West LGA which has undergone significant urban renewal and gentrification over recent decades. The Inner West is characterised by small-scale dwellings and medium density residential developments which have seen growth in the residential population who demand support services such as self-storage.

2.3. STRATEGIC CONTEXT

The site is located within the Eastern Harbour City within the Eastern City District and the Inner West Local Government Area (LGA). It is located within the Eastern Harbour Economic Corridor which extends from Macquarie Park to the international trade gateways of Sydney Airport and Port Botany. The proximity of the site to Sydney Airport and Port Botany are key elements to the ongoing industrial use of the Sydenham

Industrial Precinct. The Precinct provides support services to these key trade gateways, while also being impacted by height limitations and acoustic impact from the airport operations.

The site is also well-located to benefit from significant transport infrastructure investments, including the WestConnex and Sydenham Metro Station upgrade which forms part of the City and Southwest Metro Line. These new and upgraded transport connections will provide for reduced travel times across the Sydney rail and road networks, enabling a more efficient freight and logistics sector and enhancing the attractiveness of the Sydenham Industrial Precinct to drive increased investment and employment growth.

The Draft Planning Proposal gives detailed consideration to the relevant strategic planning policies relevant to the site and its future development, including:

- *Greater Sydney Region Plan: A Metropolis of Three Cities – Connecting People (the Region Plan)*
- *Our Greater Sydney 2056: Eastern City District Plan – Connecting Communities (the District Plan)*
- *Our Place Inner West: Local Strategic Planning Statement (LSPS)*
- *Our Inner West 2036: Community Strategic Plan*
- *Going Places An Integrated Transport Strategy for Inner West (ITS).*

Each of these policies is addressed in detail in the Planning Proposal Assessment in Section 6.3 of this report, demonstrating the strategic merit of the proposal in accordance with the LEP Guideline.

3. PRE-LODGE MENT/ SCOPING BACKGROUND

3.1. CONSULTATION WITH COUNCIL

Prior to lodgement of this planning proposal, the proponent and representatives from the project team held a meeting with Council officers on 27 March 2023 to obtain preliminary feedback on the Scoping Proposal. Council issued their Scoping Proposal feedback on 17 May 2023. The letter and accompanying documents detail the matters that need to be addressed in the preparation of the draft Planning Proposal, based on referral responses obtained from public agencies and technical experts within Council.

A summary of the matters discussed during the meeting are provided in Table 4.

Table 4 Pre-Lodgement Discussions

Matter	Section of the Report
<i>Inner West Council – Scoping Proposal Advice</i>	
<p><u>State and Local Strategic Plans</u></p> <p>A review of strategic planning strategies included the Metropolis of Three Cities: Greater Sydney Region Plan, Eastern City District Plan, Inner West’s Local Strategic Planning Statement (LSPS), Employment and Retail Lands Strategy (ERLS), Community Strategic Plan (CSP) 2036 and Integrated Transport Strategy (ITS).</p> <p>Given the retention of the industrial zoning and the lack of additional permitted uses being sought, the proposal largely aligns with these strategies.</p> <p>In any future planning proposal, a detailed assessment of the proposal against these strategies is required. This should include consistencies and inconsistencies. Refer to Section 2 of the Local Environmental Plan Making Guideline (September 2022) for further details.</p>	<p>A review of the proposals consistency with the Metropolis of Three Cities: Greater Sydney Region Plan, Eastern City District Plan, Inner West’s Local Strategic Planning Statement, Employment and Retail Lands Strategy, Community Strategic Plan (CSP) 2036 and Integrated Transport Strategy (ITS) has been undertaken in Section 6.3</p>
<p><u>Land Use Zoning</u></p> <p>As of 26 April 2023, the site is zoned E4 - General Industrial. Prior to this, it was zoned IN1 - General Industrial. A savings provision for the IN1 - General Industrial zone is in place for two years. This means any land uses that were permissible under the IN1 - General Industrial zone will remain so until 26 April 2025. For further information please see DPE’s webpage on employment zones reform.</p> <p>Generally, the proposal seeks to continue using the self-storage facility which will continue to be permitted in the E4 General Industrial zoning. Any future planning proposal must address consistency</p>	<p>The Planning Proposal does not seek to amend the underlying zoning or permitted land uses. An assessment of the proposal’s consistency with Ministerial Direction 7.1 Employment Zones has been undertaken in Section 6.3.</p>

Matter	Section of the Report
with Section 9.1 Ministerial Direction 7.1 Employment Zones.	
<p><u>Floor Space Ratio (FSR) and Urban Design</u></p> <p>The proposal seeks to increase the FSR of the site from 0.95:1 to 3.4:1. The indicative scheme illustrates that the existing buildings on the site would be retained, and the proposed extension would be next to the existing building footprint with up to 17,270 sqm new GFA in a 7-storey building. The total proposed GFA is 23,789 sqm.</p> <p>Whilst the detailed architectural plans are noted, Council requires that an urban design analysis be undertaken to adequately take into consideration any bulk and scale impacts of the proposed development in formulating the proposed FSR on this site. This should consider the existing and future desired context of the locality with specific consideration for approved and potential developments within the vicinity of the site.</p> <p>Further, the urban design study should provide analysis of the existing area and the desired future character of the area including analysis of the built form, landscape design (street trees, open space and vegetation), overshadowing impacts and visual impact analysis from the surrounding public domain, particularly any low-density residential streets (for example – Smidmore Street, Mary Street, Edgeware Road and Darley Street).</p> <p>The design should also consider opportunities for maximising deep soil areas within the proposal and introduce new large canopy trees within the subject site and along the streetscapes.</p>	<p>An Urban Design Study (Appendix B) has been prepared for the proposal and it includes an analysis of the existing area, desired future character, overshadowing and visual impacts. These impacts are also discussed in Section 6.3.</p> <p>Consideration of landscaping and deep soil zones as part of the design has been undertaken in Section 4.6.</p>
<p><u>Height of Building (HOB)</u></p> <p>No HOB development standard applies to the site. This is consistent with other industrial zoned sites in the southern portion of the LGA. Height for this site is limited by FSR, development assessment considerations, complying development allowances and the Obstacle Limitation Surface (OLS) from Sydney Airport.</p> <p>The proposed 3.4:1 FSR would allow for a significantly taller building. The indicative scheme indicates that the building would have a maximum height of 23.5m. Any future proposal must be</p>	<p>The Urban Design Report prepared by HAL Architects (Appendix B) includes consideration of the built form in the context of the surrounding development character bulk and scale.</p> <p>The Planning Proposal seeks to support a building form which will be compliant with the Sydney Airport OLS requirements. The OLS for the site is 51 AHD. The indicative concept design for the proposal indicates that the proposed height of the development would be 30m (34.53 AHD) which is well below the OLS for the site. This is further discussed in in Section 6.3.</p>

Matter	Section of the Report
<p>accompanied with an urban design report which considers the potential amenity impacts of the proposed scale of the development and must be compliant with Sydney Airport's OLS requirements.</p>	
<p><u>Acid Sulfate Soils</u></p> <p>The site is classified as Acid Sulfate Soils Class 2 under the IWLEP 2022. Any future planning proposal must adequately address consistency with Section 9.1 Ministerial Direction 4.5 Acid Sulfate Soils.</p>	<p>Table 19 provides details on the planning proposal's consistency with Ministerial Direction 4.5 Acid Sulfate Soils.</p>
<p><u>Marrickville Development Control Plan 2011 (MDCP 2011)</u></p> <p>The future desired use and form of the site will need to be assessed against the MDCP 2011. Prior to submission of the planning proposal, a general assessment of the MDCP 2011 should be undertaken to ensure the objectives and controls can be achieved. Specific attention should be given to Section 9.39 which covers the strategic intent of the site's locality known as "Marrickville Metro (Precinct 39)."</p>	<p>A general assessment of the proposal's compliance with the Marrickville DCP has been undertaken in Section 5.2.2. This confirms that the indicative concept design of the proposal is compliant with the identified controls and is consistent with the strategic intent of the Marrickville Metro locality. A more detailed compliance assessment with the DCP controls will be undertaken at the DA stage.</p>
<p><u>Traffic & Parking</u></p> <p>The preliminary traffic impact assessment submitted with the proposal concludes that the proposal is supportable on traffic planning grounds as it would not result in adverse impacts on the surrounding road network or the availability of on-street parking. This is considered acceptable given the low traffic generation rate of a use such as a self-storage facility.</p> <p>Council's traffic engineers and Transport for NSW have requested for further detailed traffic impact analysis which also considers the transition to higher order uses on the site, such as hardware and building supplies and light industry uses which are permissible in the E4 zoning and can potentially result in adverse traffic impacts on the local network.</p> <p>A detailed traffic impact assessment should be submitted with the planning proposal which:</p> <ul style="list-style-type: none"> ▪ at a high level considers the traffic impacts of other uses which may be permitted in the E4 Zone. It is also noted that any change of uses 	<p>A Preliminary Traffic Assessment has been prepared by Ason Group (Appendix C).</p> <ul style="list-style-type: none"> ▪ The Planning Proposal will support self-storage facilities on the site which is consistent with the existing operation of the site. The Planning Proposal seeks to change the FSR supported on the site for this use only. Therefore, any increase in development yield achieved by the change in the Site controls is considered only for the future use of the site as a self-storage facility. ▪ Refer to Section 3.3 of the Preliminary Traffic Assessment for traffic counts undertaken in June 2023. ▪ The traffic from the approved Woolworths development (application no. DA/2022/0280, approved 2/04/2023), has been adopted for the Background Case and Project Case scenarios in the modelling assessment. Refer to Section 5.3 of the Preliminary Traffic Assessment ▪ Refer to Section 5.3 of the Preliminary Traffic Assessment for the impacts of the proposal on

Matter	Section of the Report
<p>on the site would be subject to its own site-specific merit assessment at the development application stage. And therefore, does not have to fully resolved at the planning proposal stage;</p> <ul style="list-style-type: none"> ▪ includes traffic counts of adjacent streets as well as traffic modelling of the adjacent intersections at Murray Street and Edinburgh Road and Edinburgh Road and Bedwin Road; ▪ accounts for potential future traffic impacts from redevelopment of surrounding properties, including the Woolworths Customer Fulfilment Centre that was recently approved at 74 Edinburgh Road, Marrickville; ▪ assesses the impacts on the level of service for surrounding intersections; ▪ provides swept paths analysis for vehicles turning to/ from the site; ▪ meets the relevant MDCP car parking requirements for industrial/ light industrial uses; and ▪ considers the future cycleway on the opposite side of Edinburgh Road. <p>Further some of the detailed matters relating to access, parking and traffic generation are not planning proposal matters and will need to be addressed at the development application stage.</p>	<p>the level of service for surrounding intersections.</p> <ul style="list-style-type: none"> ▪ Refer to Appendix A of the Preliminary Traffic Assessment for swept paths analysis. ▪ The parking assessment for the Proposal has given regard for the self-storage uses. It is noted that parking requirements are a matter for future development applications. Nevertheless, the proposed design submitted as part of the Planning Proposal can provide sufficient parking for the proposed storage use. ▪ Apart from the design considerations, which are a matter for future development applications, the proposed amendment to the FSR control for the site will not adversely impact on the delivery of the future cycleway.
<p><u>Flooding</u></p> <p>The site is in a floodplain and subjected to flooding from Smidmore Street to the north, Edinburgh Road to the south and Murray Street to the west as per the MDCP. Any planning proposal submitted to Council must adequately address consistency with the section 9.1 Ministerial Direction 4.1 Flooding, including:</p> <ul style="list-style-type: none"> ▪ relevant recommendations of the NSW Government's 2022 Flood Inquiry Report; ▪ clearly addressing the requirements of Direction 4.1, providing clear assessment and consideration the level of flood hazard(s) that may impact the proposal. <p>Further If the application proceeds to development assessment stage, Council's stormwater engineers</p>	<p>A Preliminary Flood Assessment Report (Appendix D) has been prepared by HydroStorm Consulting. Section 7.4 of the report addresses the NSW Government's 2022 Flood Inquiry Report, Section 7.1 of the report addresses the Ministerial Direction and Section 8 of the report addresses Council's stormwater engineer advice. This advice will also be addressed during the DA stage.</p>

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<p>have provided the following advice in relation to detailed design matters:</p> <ul style="list-style-type: none"> ▪ A flood certificate must be obtained from Council and the proposed flood modelling must be calibrated to match the flood levels provided in the flood certificate. ▪ Any new development cannot rely on flood gates for flood mitigation. Any new floor levels should be designed at the flood planning level to protect the site from flooding. ▪ The existing warehouse is below the floor planning level. If this is to be retained, this will require floodproofing works to ensure building remains protected from flooding. Flood gate(s) may be acceptable in protecting the existing building and doors. This does not apply to the new development, only the existing building. ▪ Flooding at Smidmore Street and Edinburgh Road can be treated as two distinct flooding areas. If the flood depth on Smidmore Street is less than 300mm then a freeboard of 300mm will be acceptable at Smidmore Street. ▪ A reduced freeboard for vehicle access and parking may be acceptable in accordance with the MDCP 2011. Justification will need to be provided for any reduction below the flood planning level. ▪ The proposed flood storage offset may be unnecessary. Water currently enters the outdoor carpark to a depth of 500mm and maintenance of this storage area may be difficult. The storage area will need to be justified by pre and post flood modelling and if flood storage is required on site, then it must be self-draining under gravity. Council's latest flood model can be made available via a formal application. ▪ A flooding management plan for the self-storage units may be submitted in order to minimise damage to property and risk to life where a reduced freeboard is required and justified. 	

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<p><u>Contamination</u></p> <p>Any future planning proposal must adequately address consistency with the Section 9.1 Ministerial Direction 4.4. Remediation of Contaminated Land. A Detailed Site Investigation (DSI) and Remediation Action Plan (RAP) may be required at the development application stage to ensure consistency with SEPP (Resilience and Hazards) 2021.</p>	<p>The site is currently used for industrial purposes as a self-storage facility and smash repair works. The Planning Proposal maintains the sites industrial use. Any required remediation will be investigated at the detailed DA stage.</p>
<p><u>Development near regulated airports and defence airfields</u></p> <p>The site is located nearby Sydney Airport and is affected by the 20-25 ANEF contour. Any future planning proposal must adequately address consistency with the Section 9.1 Ministerial Direction 5.3 Development Near Regulated Airports and Defence Airfields.</p>	<p>This is discussed in Table 19.</p>
<p><u>Urban sustainability</u></p> <p>Inner West Council is responding to the climate crisis by working to become carbon neutral and 100% renewable. It is strongly encouraged to exceed the minimum LEP/DCP sustainability requirements for the proposed development to assist with reducing carbon emissions and achieving carbon neutrality. Refer to Council's Climate and Renewables Strategy for further information.</p> <ul style="list-style-type: none"> ▪ The future development may increase the urban heat island effect. Cooling measures should be incorporated into the design to counter this effect. This could include green walls and/or facades, landscaping surrounding the building, or a green roof. Please refer to Council's Green Roofs, Walls and Facades Technical Guidelines for further information. ▪ Use of Solar energy is strongly encouraged. The future development is well suited for rooftop solar. If it were to be used as self-storage units, the site could be disconnected from gas and powered entirely by electricity with all daytime energy demand being met by onsite solar. The extensive roof space could accommodate a very large solar array which could also feed excess energy into the grid. 	<p>These issues will be further considered and addressed during detailed design at the DA stage.</p>

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<p><u>Other design matters</u></p> <p>Detailed design matters relating to access, acoustics, waste and resource recovery etc. are to be addressed at the development application stage. Pre-DA advice can be obtained if the planning proposal is supported to further guide the detailed design of the new development.</p>	Noted.
<p><u>Section 7.11 & 7.12 Contributions</u></p> <p>The <i>Inner West Local Infrastructure Contributions Plan 2023</i>, prepared under Sections 7.11 and 7.12 of the <i>Environmental Planning and Assessment Act 1979</i>, and applies to the site. This plan replaces the former <i>Marrickville Contributions Plan 2014</i>. These contributions are to be determined and paid at the development application stage.</p>	Noted.
<p><u>Land value uplift and planning agreements</u></p> <p>Council has adopted the Voluntary Planning Agreements Policy which sets out the purpose, scope and objectives for the preparation of planning agreements. This policy sets out a robust set of guidelines or procedures for determining how residual value is captured and can contribute towards an innovative delivery of public infrastructure, facilities, works services and social amenities in line with Council strategic planning objectives for planning proposals.</p> <p>The planning proposal should consider the requirements of this policy. If a letter of offer is made to enter into a planning agreement, this should be negotiated directly with Council's Strategic Properties team.</p>	A Voluntary Planning Agreement will be negotiated with Council during the Planning Proposal process.
<i>State agency consultation</i>	
<p><u>Department of Planning and Environment (DPE)</u></p> <p>DPE raised the following key matters:</p> <ul style="list-style-type: none"> ▪ How does the planning proposal justify the proposed increase in the site's maximum FSR from 0.95:1 to 3.4? ▪ How does the proposal demonstrate strategic and site-specific merit, including how the proposal addresses the Eastern City District Plan, the Inner West LSPS and other 	<p>The following matters have been addressed:</p> <ul style="list-style-type: none"> ▪ The increase has been justified in Section 6.3. ▪ The proposal has demonstrated the strategic and site-specific merit in Section 6.3. ▪ The requirements of the relevant SEPPs have been addressed in Section 6.3. ▪ The key issues have been addressed in Section 6.3 and supporting documentation has been provided which addresses the potential

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<p>requirements in the relevant Section 9.1 Ministerial Directions?</p> <ul style="list-style-type: none"> ▪ How have the requirements of the relevant State Environmental Planning Policies been addressed? ▪ How does the planning proposal intend to manage key issues and have all the relevant supporting documents been provided (i.e., acoustic, flooding, economic, transport, overshadowing, access and parking etc)? This should include impacts on the site and surrounding land. ▪ Have all community and agency stakeholders been identified for consultation (i.e., TfNSW, Sydney Metro, the GCC, Ausgrid and Sydney Airport Corporation)? 	<p>impact of the site on surrounding land and how this would be managed.</p> <ul style="list-style-type: none"> ▪ The following community and agency stakeholders have been identified for consultation and they are: TfNSW, Sydney Metro, Ausgrid, Sydney Water and Sydney Airport Corporation.
<p><u>Transport for NSW (TfNSW)</u></p> <p>TfNSW raised the following matters:</p> <ul style="list-style-type: none"> ▪ Concerns may be raised regarding the potential traffic impacts of alternate permissible uses in the land use table under IN1 – General Industrial (now E4 – General Industrial) that may result from the proposed increase of FSR, namely ‘hardware and building supplies’. It is suggested that an assessment of an alternative development scenario (ie. worst-case scenario) is considered to ensure the planning proposal can be reasonably developed in the future under the proposed FSR change and impacts managed within the existing constraints of the local road network. ▪ Investigate how public and active transport access and needs would integrate with the surrounding established and potential transport network (ie. Sydney Metro). The Practitioner’s Guide to Movement and Place can be utilised, where appropriate, to assist in guiding desired outcomes for street and road environments. 	<p>A Preliminary Traffic Assessment has been prepared by Ason Group (Appendix C).</p> <ul style="list-style-type: none"> ▪ As above, this Planning Proposal refers to the specific storage facility use, consistent with the existing operation of the site. It is understood that the Planning Proposal will seeking changes to Council’s controls for this use only. Therefore, any increase in development yield achieved by the change in the Site controls is not considered necessary. ▪ These are considered more detailed design considerations for future development applications. However, we note the following: <ul style="list-style-type: none"> – Refurbishment and redevelopment (which would maintain the heritage elements of the existing building) of the Site would ultimately improve the streetscape which will be a key desire line for the future metro; – As shown by the concept design provided to support the Planning Proposal, the removal of one of the existing buildings presents an opportunity for a through site link, increasing permeability for pedestrians and cyclists.

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	Further, the access strategy will reduce traffic volumes on Edinburgh Road, which is likely to be a key desire line for pedestrian and cyclists, noting the connectivity from the Bedwin Road cycle path
<p><u>Sydney Metro</u></p> <p>Sydney Metro raised the following matters:</p> <ul style="list-style-type: none"> ▪ The proponent must consult with Sydney Metro to consider integration with the proposed shared path along the southern side of Edinburgh Road. ▪ Corridor protection – consideration of State Environmental Planning Policy (Transport and Infrastructure) 2021 and submission of a report to demonstrate compliance with the Sydney Metro Underground Corridor Protection Guidelines and/or Sydney Metro At Grade and Elevated Section Corridor Protection Guidelines as applicable (available from www.sydneymetro.info) 	<ul style="list-style-type: none"> ▪ Noted. Consultation with Sydney Metro will be undertaken. ▪ A report confirming compliance with Sydney Metro Underground Corridor Protection Guidelines and/or Sydney Metro At-Grade and Elevated Section Corridor Protection Guidelines will be undertaken at the DA stage.
<p><u>Civil Aviation Safety Authority (CASA)</u></p> <p>CASA had no objection to the proposal on condition that the finalised developed height does not infringe the Prescribed Airspace for Sydney Airport as declared by the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts.</p>	<p>The Obstacle Limitation Surface (OLS) for the proposal site is 51m AHD. The indicative concept building height for the proposal is 30m (34.53 AHD) which is well below the OLS for the site.</p>

3.2. POST-LODGEMENT CONSULTATION WITH INNER WEST COUNCIL

Following formal lodgement of the Planning Proposal report on 28 August 2023, we have worked with Council to identify suitable landscape response for the site. In October 2024, Council indicated support for a proposal which provided 7.5% deep soil planting and qualitative tree canopy coverage for the site.

In response to this agreement, the Planning Proposal has been updated and the revised Planning Proposal package issued to Council.

4. THE PROPOSAL

4.1. OVERVIEW

National Storage has identified high demand for self-storage facilities within the trade-catchment of the Site. This demand is for both residential uses of private storage of personal items, as well as businesses operating within the Inner West and broader Eastern City region.

The project team have worked closely to create an Indicative Concept Plan for future redevelopment of the site which seeks to provide landscaping on the site, retain the majority existing shed structure on the western portion of the site, while also supporting a new building located on the eastern part of the site which will provide modern storage units. The combination of these building forms is able to accommodate an increased Floor Space Ratio while remaining below the OLS for Sydney Kingsford Smith Airport.

The Indicative Concept Plan has informed the scope of the Planning Proposal amendments required to support the future development vision of the site. The key elements of the Planning Proposal amendments to the IWLEP 2022 are summarised in this section.

4.2. INNER WEST LOCAL ENVIRONMENTAL PLAN 2022 AMENDMENT

The Planning Proposal proposes to amend Part 6 of the IWLEP 2022 to include an additional clause that states.

(1) This clause applies to land at Lot 1 in DP607677 and Lot 67 in DP4991, 11-11A Edinburgh Road, Marrickville, identified as "XX" on the Key Sites Map

(2) A building on the subject land may exceed the floor space ratio shown on for the land on the Floor Space Ratio Map by an amount no greater than 2.25:1 if the building is used for the purposed of self-storage units.

(3) A building on the subject land may not exceed a maximum building height of 30m (RL34.53)

(4) Redevelopment of the site will require the provision of a minimum of 7.5% of the site area to be provided as deep soil area.

(5) In this clause –

***Self storage units** means a premises that consist of individual enclosed compartments for storing goods or materials (other than hazardous or offensive goods or materials).*

No other changes are proposed to the zoning or permissible land uses.

4.3. INDICATIVE LAYOUT PLAN – DESIGN PRINCIPALS

The Indicative Concept Plans have been prepared by Hayes Anderson Lynch Architects (HAL) to inform the scope of the Planning Proposal and associated amendments to the IWLEP 2022, and test suitability of the future massing in the surrounding built form context.

The Indicative Concept Plan includes the provision of landscaping on part of the western portion of the site, retention of the majority of the existing brick warehouse building which is located on the western portion of the site. While the warehouse does not have any heritage status, the building is intact, and its brick construction is reflective of the brick manufacturing industries within Marrickville and surrounding suburbs.

To support the retention of the brick warehouse, built form testing on the eastern portion of the Site has indicated that a form of 7-storeys can be supported below the OLS for Kingsford Smith Airport. The new eastern structure will accommodate a range of storage units including mini-warehouses at Ground Floor, a range of sizes of regular self-storage units, a specialised wine storage facility, known as 'Wine Ark', Box Shop fronting Edinburgh Road and building services and amenities.

The key design principles which have guided the development of the Indicative Concept Plan are detailed in the Urban Design Report prepared by HAL and are summarised as follows:

- OLS for the Sydney Kingsford Smith Airport to limit height
- Surrounding approved Development RLs (Reduced Levels) to guide bulk and scale suitability
- Strong street edge to most street frontages extending the existing warehouse street frontages and Marrickville Metro
- Scale of walls and form that responds to current industrial character of surrounding site interfaces.
- Use of brick at lower levels to connect with historic industries and also complement retained warehouse form
- Provision of extensive landscaping along street frontages in suitable locations.

4.4. LAND USE AND BUILT FORM MASSING

The Indicative Concept Plan for the proposal provides a multi-level self-storage premises that will comprise two buildings that will be joined by an undercover driveway that provides access and egress through the site. The concept scheme involves:

- Seven storeys of self-storage units being developed on the existing 11A Edinburgh Road, Marrickville site.
- 2 levels of self-storage units across the existing 11 Edinburgh Road, Marrickville site, utilising the majority of the existing warehouse building.
- Ancillary offices, box shop and associated car parking and loading and manoeuvring areas accessed via Edinburgh Road.
- 7.5m wide landscaping area on the western portion of the 11 Edinburgh Road, Marrickville site.
- The potential built form is consistent and compatible with the locality. Its scale is complementary to the shifting scale of development within the industrial area fronting Edinburgh Road, including:
- The recently completed Marrickville Metro expansion at 20 Smidmore Street, Marrickville which provides a strong street edge to all street frontages and having a maximum building height of approximately RL26.7m.
- The approved Woolworths Customer Fulfilment Centre at 74 Edinburgh Road, Marrickville which includes a mix of building heights across the site, and a maximum building height of RL37.06m
- The indicative Concept Plans demonstrate that the Planning Proposal will support the development of a high-quality self-storage premises on the site which aligns will and complements the evolving built form of the Marrickville Industrial Area and service the growing demand for self-storage within the Marrickville Industrial Area.

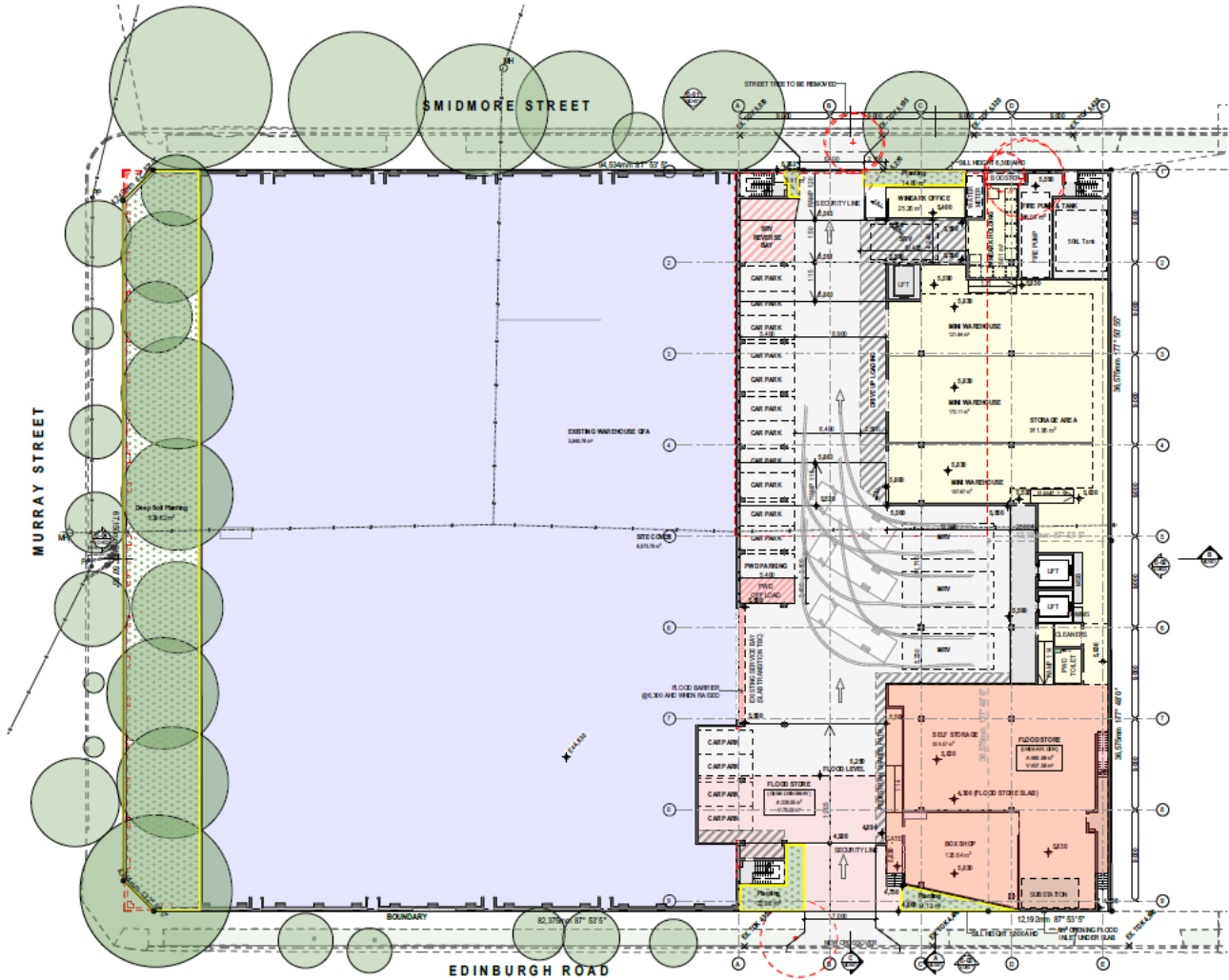
Key numerical details of the concept design are provided in Table 5. The key design elements are explored further in the Urban Design Report prepared by HAL Architects (**Appendix B**). An indicative concept design of the ground floor plan, elevations and sections are provided in Figure 5 to Figure 8.

Table 5 Key Proposal Numerical Details

Element	Indicative Development Outcome
Land use	<ul style="list-style-type: none"> ▪ Self-storage units: 22,725m² ▪ Office/retail premises: 25m²
Total Gross Floor Area	22,745m ²
Floor Space Ratio	3.2:1
Building Height	30m (RL34.53)
Car parking	16 spaces

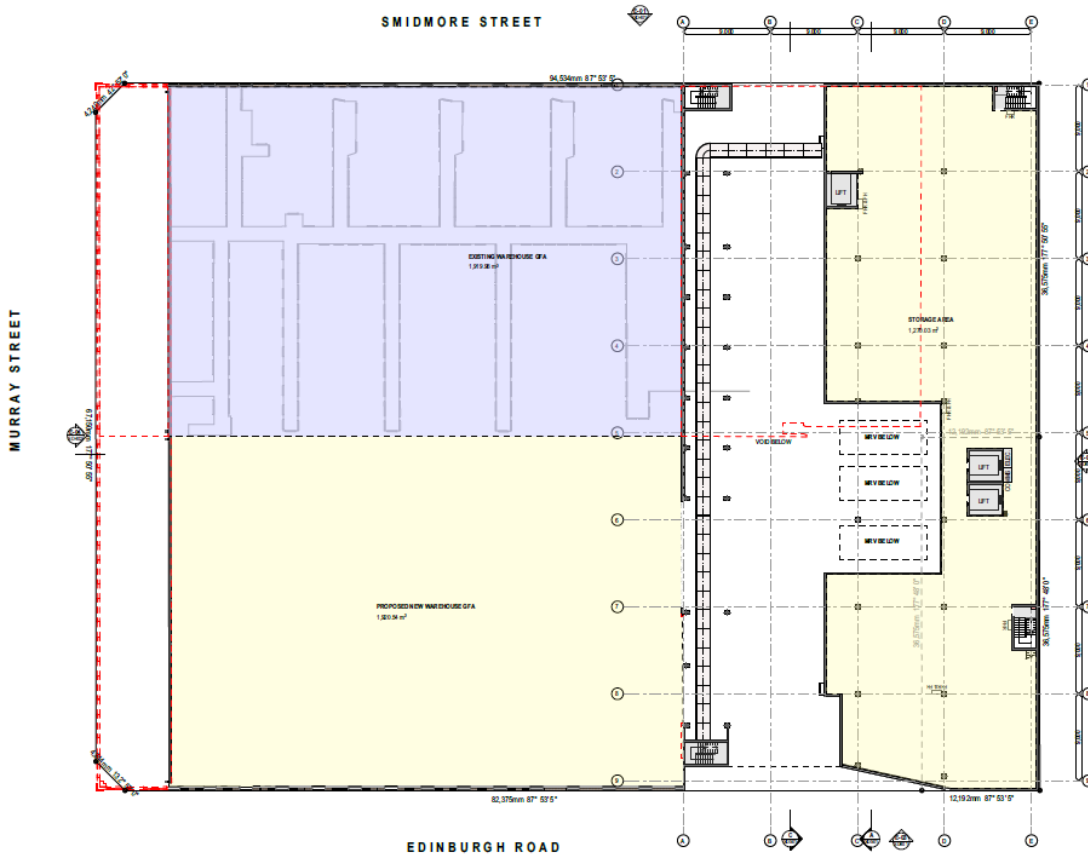
Element	Indicative Development Outcome
Deep Soil Provision	534m ² = 7.5% of the site area

Figure 5 Ground Floor Plan



Source: HAL Architects, 2024

Figure 6 Level 1 Floor Plan



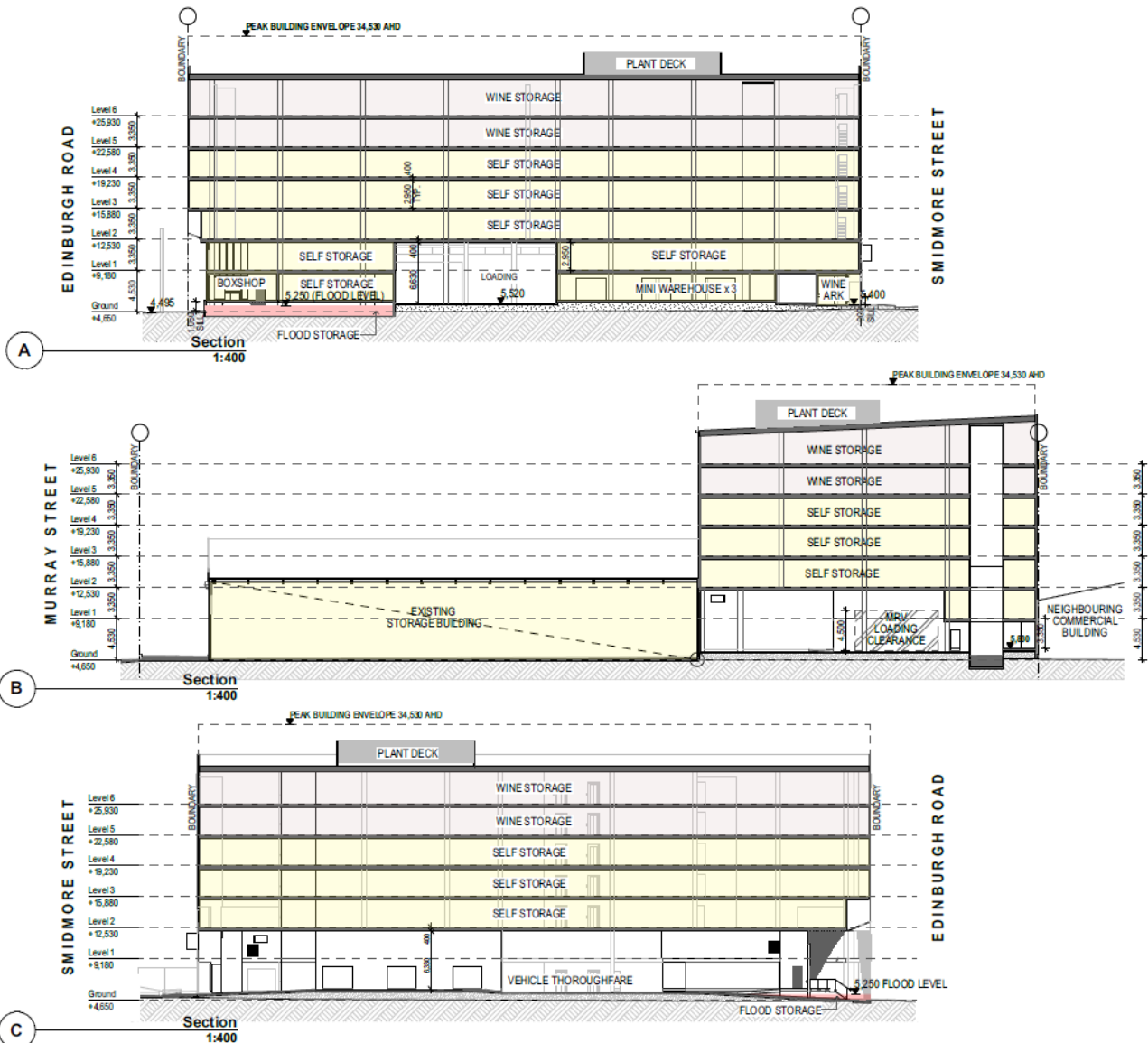
Source: HAL Architects, 2024

Figure 7 Proposed Elevations



Source: HAL Architects, 2024

Figure 8 Proposed Sections



Source: HAL Architects, 2024

4.5. ROAD HIERARCHY, TRANSPORT AND ACCESS

The site is located on the corner of three streets: Edinburgh Road, Smidmore Street and Murray Street. Current vehicle access points to the site are from Edinburgh Road and Smidmore Street. The existing vehicle access from Edinburgh Road will continue to be utilised to provide for vehicle ingress. It is proposed that the vehicle manoeuvring areas will be one-way, with the egress onto Smidmore Street being located generally in alignment with the ingress from Edinburgh Road.

Based on established guidelines, 16 parking spaces are proposed to service the site.

The site is well serviced by public transport with 3 bus stops within 400m walking distance and 5 bus services providing connections to the surrounding suburbs and Sydney CBD during the morning and evening peak periods. Sydenham Railway Station is approx. 1.2km from the site and St Peters approx. 850m from the site. There is also an existing cycle network within the vicinity of the site with an existing off-road pedestrian and cycle path on Edinburgh Road adjacent to the site and a pedestrian link that connects to Sydenham Railway Station, south of Sydney Street Road.

4.6. LANDSCAPE

The site is generally vacant of landscaping and vegetation. There are a couple of small shrubs located at the north-eastern corner of the Smidmore Street frontage where a vehicle hardstand is located.

The Indicative Concept Plan has adopted the provision of landscaping and deep soil zones on the western portion of the site. A 7.5m strip of landscaping will be provided to achieve approx. 7.5% of the site area. The detailed design of the landscaping will be further explored during the DA stage.

4.7. FLOODING

The site lies in the flood prone land of the east catchment in Marrickville. In a major flood event, once the capacity of the pipes is exceeded, overland flow paths develop and generally carry flow along the streets in the catchment. All streets surrounding the proposed development are overland flow paths with Murray Street and Edinburgh Road subject to significant flooding.

The existing building floor level is below the flood planning level and is currently exposed to flood risk from Edinburgh Road flooding. The proposed building footprint also encroaches on the flood storage area within the existing footprint along Edinburgh Road.

The indicative concept plan includes the following mitigation measures to reduce flooding impacts:

- Provision of a flood gate at the entrance to the existing building
- Provision of approx. 500m² of onsite flood storage underneath the new building. The size of the flood storage would be confirmed during detailed design at the DA stage.

4.8. DEVELOPER CONTRIBUTIONS

The relevant contributions plan for the site is the *Inner West Local Infrastructure Contributions Plan 2023*. The applicable contribution rate is \$3,187 per net additional worker, calculated on the net increase in workers at a site and indexed at the time of payment. The Draft Planning Proposal seeks to deliver additional self-storage floorspace through an increase in the FSR control. This additional floorspace will generate contributions at the DA stage when the net increase in workers is able to be calculated.

5. PLANNING FRAMEWORK

5.1. STRATEGIC CONTEXT

This section of the report identifies the strategic planning policy framework and the way in which the proposal is aligned with, and will contribute to the delivery of, the relevant objectives and planning priorities which are relevant to the site.

5.1.1. Greater Sydney Region Plan: A Metropolis of Three Cities

The *Greater Sydney Region Plan: A Metropolis of Three Cities (Region Plan)* provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036. The Region Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability. The following matters are relevant to the proposed development:

- *Objective 15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive*

The site is located in the major industrial area of Marrickville which helps provide essential trade and services that support specialised economic activities. It is located close to Sydney Airport and Port Botany which are identified as major asset and trade gateways within the Eastern Economic Corridor. The proposed plan amendment seeks to deliver additional floorspace which can support the ongoing viability of businesses which service and require access to these trade gateways. Further, the development will increase job opportunities in the Marrickville Industrial Area within walking distance of Sydenham and St Peters railway stations.

- *Objective 23: Industrial and urban services land is planned, retained and managed*

The proposal does not seek any change to the existing E4 General Industrial zoning. The proposed amendment to increase the current maximum FSR control would facilitate retention and optimal use of existing industrial land within the Eastern Harbour City. It would support the growing demand for additional storage floor space close to Sydney Airport, Port Botany and the Sydney CBD, and time sensitive / last mile distribution across the eastern and south-eastern suburbs of Sydney.

Overall, it is considered that the proposed FSR uplift is entirely aligned and consistent with the Greater Sydney Region Plan and will contribute to the delivery of its objectives.

5.1.2. Our Great Sydney 2056: Eastern City District Plan

The *Eastern City District Plan (District Plan)* is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The District Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The Planning Proposal is aligned to the achievement of the following key planning priorities and actions contained within the District Plan:

- *Planning Priority E7: Growing a stronger and more competitive Harbour CBD*

The proposed increase in FSR will accommodate additional industrial floorspace to support the Harbour CBD and Eastern Economic Corridor. The site is positioned within key employment lands which are located in close proximity to major logistics hubs around Port Botany, the Sydney CBD and the growing residential population within the Inner West which has recently seen housing growth in medium density residential dwelling. The Proposal will provide key storage facilities which can support the increased

residential population and surrounding businesses, as well as last-mile storage for operators within the Inner West and Inner Sydney.

- *Planning Priority E12: Retaining and managing industrial and urban services land*

The proposed plan amendment seeks to deliver additional industrial floor space capacity to accommodate the strong demand within the locality. The increase in FSR on the site will enable to site to increase its contribution of industrial floorspace which is entirely consistent with this key Planning Priority. Further, as National Storage provide storage to both domestic users and commercial businesses, the facility would improve its contribution to supporting local urban service lands by providing a support function to these businesses.

- *Planning Priority E13: Supporting growth of targeted industry sectors*

The proposed plan amendment will provide additional industrial floor space and storage space to support emerging industries including boutique breweries, coffee roasters and other artisans that are becoming more prevalent in Marrickville, Erskineville and the Inner West and Inner Sydney.

5.1.3. Future Transport Strategy

The *Future Transport Strategy (Future Transport)* was released 5 September 2022 and is intended to replace *Future Transport 2056: Shaping the Future (Future Transport 2056)*, which was published in 2018. The intention of this new strategy is to take into account events, such as the COVID-19 pandemic, drought, bushfires, floods and global upheaval which has altered the trajectory of many social, economic and cultural trends in NSW. Future Transport also considers the recent strategic re-imagining of the 'Metropolis of Three Cities' into a 'Six Cities Region' underpinned by the three additional cities of the Lower Hunter and Newcastle City, the Illawarra-Shoalhaven City and the Central Coast City.

Future Transport therefore provides a refreshed take on the vision established under Future Transport 2056 and outlines a vision and strategy for the management of transport services and infrastructure across NSW. Future Transport's vision for Greater Sydney is similarly built around the concept of a 30-minute city, characterised by an integrated network of city-shaping, city-serving, and centre servicing corridors. The vision now consists of three transport outcomes, underpinned by 14 strategic directions with associated actions to realise these directions and outcomes. These outcomes are:

- Connecting our customers' whole lives;
- Successful places for communities; and
- Enabling economic activity.

These outcomes will be used to guide transport services and infrastructure in Greater Sydney to 2056. Transport networks will continue to be developed in order to support economic activity and job creation, successful and sustainable places, and an integrated 30-minute city. The Strategy identifies strategic transport corridors, which include city-shaping, city-serving and centre-serving networks that will integrate the city with 30-minute connections to strategic and metropolitan centres. In accordance with Future Transport the Proposal will support integrated land use and transport planning, providing higher-density development and employment around a public transport node.

5.1.4. Industrial Lands 'Retain and Manage' Policy Review

The Greater Cities Commission published the *Industrial Lands 'Retain and Manage' Policy Review* in June 2022 following extensive council and stakeholder consultation and technical analysis. The Review Findings Paper sets out draft Guiding Principles for industrial lands that are proposed to be included in the draft Region Plan, due to be exhibited in the second half of 2023. The draft Guiding Principles build on the strategies and principles in the Greater Sydney Region Plan and provide greater clarity on 'managing' industrial lands that respond to the changing nature of land use needs in Greater Sydney. They provide a draft strategic framework to assist councils planning for 'retain and manage' categorised industrial land. The draft Guiding Principles should be used as part of any review of how industrial land is managed.

The Planning Proposal is aligned with the draft Guiding Principles as follows:

- *Draft Guiding Principle 1: Securing capacity of industrial and urban services land*

The proposed plan amendment will contribute to ensuring there is sufficient industrial land and allowable floor area, of the right type, to meet the State's needs now and in the future.

- *Draft Guiding Principle 2: Supporting sustainability Policy and aspirations Industrial lands*

The Proposal aligns with government environmental objectives and community expectations by providing greater availability for self-storage in a location that minimises travel and delivery times and enables efficient freight and logistics, minimising environmental and social impacts.

- *Draft Guiding Principle 3: Optimising diverse supply chains supported by infrastructure*

The proposed plan amendment will enhance businesses' access to self-storage services in a highly accessible location, supporting an efficient and resilient freight network.

- *Draft Guiding Principle 4: Boosting economic activity to support current and emerging industries*

The Proposal facilitates the adaptive capacity of well-located industrial land to support both current and emerging industries, contributing to securing current and future economic growth.

- *Draft Guiding Principle 5: Encouraging innovation*

The proposed plan amendment seeks to facilitate the adaptability of the industrial site to meet the evolving needs of users, including the need for greater diversity and intensity of use and changing industry characteristics.

- *Draft Guiding Principle 6: Providing business certainty*

The Proposal seeks to foster business investment and productivity at an industrial zoned site, consistent with the function of the Marrickville industrial area

- *Draft Guiding Principle 7: Servicing population needs*

The proposed plan amendment will enable the site to best service households and businesses to provide the self-storage services needed in the Marrickville area, as well as providing access to local employment opportunities.

5.1.5. NSW Greener Neighbourhoods Guide

NSW Greener Neighbourhoods Guide (Greener Neighbourhoods Guide) provides guidance for Council on how to understand, plan for, monitor and manage urban forests and promotes best practice and consistency in urban forest planning across NSW. It's been designed to support and complement other resources related to urban forestry and green infrastructure.

The Greener Neighbourhoods Guide includes a target of 15% deep soil on industrial sites. . The target is aspirational to encourage increased landscaping to be delivered as part of new developments.

It is noted that the site is located within an existing high density urban industrial area. There is limited green landscaped areas and tree canopy within Marrickville Industrial Area, and the site currently has no landscaping or deep soil area.

The Planning Proposal illustrates the intention of the proponent to retain the existing warehouse building on the western side of the site. The building occupies approximately 60% of the site area and therefore future development potential on the site is limited to the eastern portion of the site. Given access arrangements required to service a self-storage facility, there is limited opportunity to achieve deep soil landscaping in a considered and effective way which would positively contribute to the Greener Neighbourhoods Guide objectives.

Through engagement with Inner West Council it was identified that partial demolition of the western edge of the existing warehouse building adjacent to Murray Street could achieve the desired objectives of both Council and the Greener Neighbourhoods Guide. This has been adopted in the Indicative Concept Plan to demonstrate that approximately 7.5% deep soil landscaping can be achieved on the site.

The 7.5% deep soil landscaping is adjacent to public domain and able to positively contribute to the amenity of the area, as well as increase deep soil landscaping across the site from the current development.

Given the urban context of the site and the character of the Marrickville Industrial Area, an outcome of 7.5& deep soil landscaping on the site is considered a suitable and contextually appropriate response to the Greener Neighbourhoods Guide.

5.1.6. Our Place Inner West: Local Strategic Planning Statement

Our Place Inner West: Local Strategic Planning Statement (LSPS) provides the framework and vision for land use planning over a 20-year period in the Inner West LGA. The LSPS acts as a unifying document, implementing actions in the Region and District Plans and the council's own priorities in the community strategic plan it prepared under the *Local Government Act 1993*.

The six key themes of the LSPS are:

- Theme 1: An ecologically sustainable Inner West
- Theme 2: Unique, liveable, networked neighbourhoods
- Theme 3: Sustainable transport
- Theme 4: Creative communities and a strong economy
- Theme 5: Caring, happy, healthy communities
- Theme 6: Progressive local leadership.

The Planning Proposal will positively contribute to the achievement of the following key Planning Priorities of the LSPS:

- *Planning Priority 5: Inner West is a zero-waste community*

The proposed plan amendment seeks to deliver additional industrial floor space capacity to be utilised as a storage premises. It will provide additional space for the temporary storage of a range of items and support the reduction of waste and promote opportunities to reuse and recycle items.

- *Planning Priority 9: A thriving local economy*

The proposed plan amendment does not seek any change to the existing E4 General industrial land use zoning. The proposed FSR uplift will facilitate the delivery of additional industrial floor space to support the retention and management of industrial zoned land within the Inner West LGA. It will optimise the potential of the site to provide employment opportunities and provide a land use which will support the successful operation of other local businesses which are also operating to achieve this goal.

The proposed plan amendment is considered entirely consistent with the local planning priorities. It provides a significant investment in the Inner West LGA which will support additional local jobs and the retention of existing industrial land to strengthen the economic operations of the Eastern Harbour City and Inner West.

5.1.7. Inner West 2036: Community Strategic Plan

Our Inner West 2036 is the Inner West Community Strategic Plan (CSP) which was adopted by Council in June 2022. It provides the vision and goals for the future of the Inner West over the next 10 years up to 2036. The five key strategic directions that underpin the CSP are:

- Strategic Direction 1: An ecologically sustainable Inner West
- Strategic Direction 2: Liveable, connected neighbourhoods and transport
- Strategic Direction 3: Creative communities and a strong economy
- Strategic Direction 4: Healthy, resilient and caring communities
- Strategic Direction 5: Progressive, responsive and effective civic leadership.

The community outcomes and strategies the planning proposal is likely to positively contribute to achieving are listed and discussed below:

- *Outcome 1.6: Inner West us a zero-waste community with an active share economy*

The proposed amendment will deliver additional storage floorspace in the Inner West. This will provide additional capacity for the temporary storage of items and support the reduction of waste and promote opportunities to reuse and recycle items.

- *Outcome 3.3: The local economy is thriving*

The proposed plan amendment does not seek to change the existing E4 General Industrial land use zoning. It will support the retention and management of industrial zoned land within the Inner West LGA, providing increased floorspace to support local businesses, employment opportunities and last-mile storage for a range of business operating in the Inner West and Inner Sydney.

5.1.8. Inner West Employment and Retail Lands Strategy

The *Inner West Employment and Retail Lands Strategy (Employment and Retail Lands Strategy)* provides a strategic approach to the management of business and industrial zoned land in the Inner West LGA. It recognises that the effective management of land supply for employment and commercial uses will benefit businesses, residents and the local economy of the Inner West. The key principles that underpin the Employment and Retail Lands Strategy are:

- Centres are distinctive and productive
- Industrial and urban services lands are protected and managed
- Spaces for business are suitable and available
- The planning framework is clear.

The Proposal is consistent with the following strategies:

- *Strategy 1.6: Diversify business activity*

The proposed amendment will deliver additional space for a storage premises. This will help to support the growth of local businesses and home industries by providing additional storage capacity for the storage of materials and stock.

- *Strategy 2.2: Protect employment lands from being eroded by conflicting and incompatible uses*

The proposed plan amendment does not seek to change the existing land use zoning of the site. It will increase the floorspace supply of industrial land in the Inner West LGA and will ensure the retention of industrial zoned land in a key employment land area of the Inner West LGA.

- *Strategy 2.3: Retain a diversity of industrial land, urban services land and employment generating uses*

The proposed plan amendment does not seek to change the existing E4 General industrial land use zoning. Given the size of the site is over 7,000m² it is a significant land holding that will support the retention and management of industrial zoned in the inner west LGA.

- *Strategy 2.4: Floor space is flexible and adaptable*

This strategy identified the opportunity to review and identify suitable sites where additional employment floor space can be accommodated. The proposed amended FSR is wholly aligned with this strategic objective, seeking to increase the FSR on the site to accommodate increased self-storage floorspace which is of itself an employment lands use, as well as providing a key support service to the viability of employment uses within the Inner West. The Indicative Concept Plan illustrates that the size of the site allows for a variety of storage spaces to service both domestic and business users.

- *Strategy 2.5: Maximise employment outcomes when negotiating outcomes from urban renewal/infrastructure projects*

The proposed plan amendment will increase the amount of industrial floor space in the key Marrickville-Sydenham Employment precinct. It will maintain the existing E4 General Industrial land zoning and provide additional employment capacity adjacent to the recently completed Marrickville Metro expansion and Sydney Metro South Tunnel Dive Site which is anticipated to see redevelopment at the completion of the tunnelling of the Chatswood to Bankstown Metro Line.

5.1.9. Our Place Inner West: Going Places – An Integrated Transport Strategy

Our Place Inner West: Going Places – An Integrated Transport Strategy (Inner West ITS) provides the vision, principles and actions for future transport in the Inner West. The Inner West ITS is based upon 5 key priorities:

- Priority 1: Walking; facilities for people living with a disability; specialist transport services
- Priority 2: Cycling; personal mobility devices; bicycle deliveries
- Priority 3: Public transport
- Priority 4: Delivery services and freight
- Priority 5: Rideshare/taxis; carpool; carshare; motorbikes; private electric vehicles; private non-electric vehicles.

The priorities are supported by seven principles and associated principles. The Proposal is consistent with the principles of the Inner West ITS as follows:

- *Principle 1: Plan land use to support active and sustainable transport for reduced travel times and distances*

The proposed plan amendment will deliver additional storage floorspace located in close proximity to St Peters and Sydenham Railway Stations. With the introduction of the future bike link connection along Sydney Steel Road and Edinburgh Road, this will help support the use of active and sustainable transport to access the site.

- *Principle 6: Manage freight and goods delivery network to enhance efficiency and Inner West liveability*

The proposed plan amendment will provide additional storage floorspace that may be used by time sensitive and last mile distribution services. The site is located in close proximity to key freight routes including Princes Highway and the WestConnex St Peters Interchange.

5.1.10. Inner West Local Housing Strategy

The *Inner West Local Housing Strategy (Local Housing Strategy)* provides Council's housing vision and highlights the community's aspirations for housing in the LGA over the next 20 years. A key action identified in the Local Housing Strategy relevant to the Planning Proposal is:

- *Investigate opportunities for affordable, seniors and student housing as part of Marrickville Metro. At a residential floorspace ratio of 2:1 (in addition to commercial floorspace), the site could potentially produce 750 dwellings.*

The delivery of residential development in line with this objective could result in development of the adjoining Marrickville Metro site with a FSR of 2:1 for residential development, in addition to the 0.75:1 commercial floorspace currently permissible on the site. This would result in development immediately adjacent to the subject site achieving a development with an FSR of approximately 2.75:1. This Proposal would deliver a development with bulk and scale consistent with this outcome, however, would be entirely focused on supporting employment lands uses.

In addition, the proposed plan amendment would provide increased floorspace for self-storage which would support the growth of medium and high-density housing in the area.

5.2. STATUTORY CONTEXT

5.2.1. Inner West Local Environmental Plan 2022

Inner West Local Environment Plan 2022 (IWLEP) is the primary environmental planning instrument applying to the site. The site is zoned E4 General Industrial as shown in Figure 9 below. The zone objectives and permitted uses are shown in Table 6, including a preliminary assessment of the indicative concept design.

Figure 9 Land Use Zoning Map



Source: Urbis, 2023

Table 6 E4 Zone Provisions

Provision	Complies
<p><u>Objectives of the zone</u></p> <ul style="list-style-type: none"> ▪ <i>To provide a range of industrial, warehouse, logistics and related land uses</i> ▪ <i>To ensure the efficient and viable use of land for industrial uses</i> ▪ <i>To encourage employment opportunities</i> ▪ <i>To protect industrial land in proximity to Sydney Airport and Port Botany and the Eastern</i> 	<p>The Planning Proposal is consistent with the objectives of the E4 General Industrial zone. The proposed plan amendment seeks to increase the volume of employment floorspace able to be delivered in the site, which will support and strengthen the ongoing viability of the Marrickville Industrial Area. The Planning Proposal specifically links the uplift of floorspace to ‘self-storage units’ which provides a key support service to other employment lands within the Inner West LGA, as well as the residential population. The location of the Site in close proximity to the Sydney CBD,</p>

Provision	Complies
<p><i>Economic Corridor of the Greater Cities Commission</i></p> <ul style="list-style-type: none"> ▪ <i>To retain existing and encourage new industrial uses to meet the needs of the community.</i> 	<p>Sydney Airport and Port Botany also provides opportunity to deliver last-mile self-storage for businesses located within these surrounding centres and key domestic and international gateways.</p>
<p><u>Permitted without consent</u></p> <p>Nil</p>	<p>N/A</p>
<p><u>Permitted with consent</u></p> <p><i>Agricultural produce industries; Depots; Freight transport facilities; Garden centres; General industries; Goods repair and reuse premises; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Intensive plant agriculture; Kiosks; Landscaping material supplies; Light industries; Local distribution premises; Markets; Neighbourhood shops; Oyster aquaculture; Take away food and drink premises; Tank-based aquaculture; Timber yards; Warehouse or distribution centres; Any other development not specified in item 2 or 4</i></p>	<p>The Draft Planning Proposal seeks to provide the additional FSR uplift for self-storage premises which is a use that is permitted with consent in the zone.</p>
<p><u>Prohibited</u></p> <p><i>Agriculture; Air transport facilities; Airstrips; Amusement centres; Camping grounds; Caravan parks; Cemeteries; Commercial premises; Community facilities; Correctional centres; Crematoria; Early education and care facilities; Eco-tourist facilities; Educational establishments; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Function centres; Health services facilities; Heavy industrial storage establishments; Heavy industries; Helipads; Highway service centres; Home businesses; Home occupations; Home occupations (sex services); Information and education facilities; Marinas; Open cut mining; Port facilities; Public administration buildings; Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Research stations; Residential accommodation; Respite day care centres; Restricted premises; Rural industries; Tourist and visitor accommodation; Vehicle body repair workshops; Water recreation structures; Water supply systems</i></p>	<p>The Draft Planning Proposal does not propose to permit any prohibited uses on the site.</p>

The Planning Proposal does not seek to make any changes to the E4 General Industrial zone provisions including the zone objectives, permitted uses and prohibited uses. It does propose to include a new site-specific clause in the IWLEP permitting an increased FSR specifically if the site is used for the purposes of self-storage units. Further, if redevelopment of the site occurs, a minimum of 7.5% of the total site area should be provided as deep soil area. To provide guidance on the future building form on the site, the planning proposal seeks to introduce a height of building control to apply to the site. This is detailed in Section 4.2 above.

Table 7 IWLEP Compliance Table

Provision	Complies
<p><u>Height of Buildings (clause 4.3)</u></p> <p>N/A – refer Figure 10</p>	<p>Yes – the site does not have a prescribed maximum building height control. Notwithstanding, the draft Planning Proposal seeks to including an additional clause in Part 6 of the IWLEP that permits a Lot 1 in DP607677 and Lot 67 in DP4991 to not exceed a maximum building height of 30m (RL34.53)</p>
<p><u>Floor Space Ratio (clause 4.4)</u></p> <p>0.95:1 – refer Figure 11</p>	<p>Yes – the draft Planning Proposal does not seek to alter the base FSR of the site.</p> <p>However, it does propose to include an additional clause in Part 6 of the IWLEP 2022 that permits a building on Lot 1 in DP607677 and Lot 67 in DP4991 to exceed the floor space ratio by an amount no greater than 2.25:1 if the building is used for self-storage units.</p>
<p><u>Heritage Conservation (clause 5.10)</u></p> <p>The site is not identified as a local heritage item or located within a heritage conservation area – refer Figure 12. However, there are several listed items within the vicinity of the site including:</p> <ul style="list-style-type: none"> ▪ Local Heritage Item I1742: Waugh & Josephson industrial buildings former – Inter-war functionalist workshop, including interiors, showroom and offices ▪ Local Heritage Item I1316: St Pius Church, Church Hall and Presbytery, including interiors ▪ Local Heritage Item I1286: Mill House, including interiors ▪ Local Heritage Item I1250: Brick paving along Murray Street and Victoria Road. 	<p>Yes – the site is not identified as a local heritage item or located within a heritage conservation area therefore compliance with this clause is note required. However, the Indicative Concept design has considered the existing environment and history of the local area. During detailed design of the development, further consideration of how the building fits with the existing streetscape and history of the area will be undertaken.</p>
<p><u>Flood Planning (clause 5.21)</u></p> <p>Development consent must not be granted unless the consent authority is satisfied the development will satisfy the relevant flood provisions.</p>	<p>A Preliminary Flood Assessment has been undertaken which demonstrates that the relevant provisions can be accommodated within the future development including the increased floorspace. The preliminary flood assessment confirms that:</p>

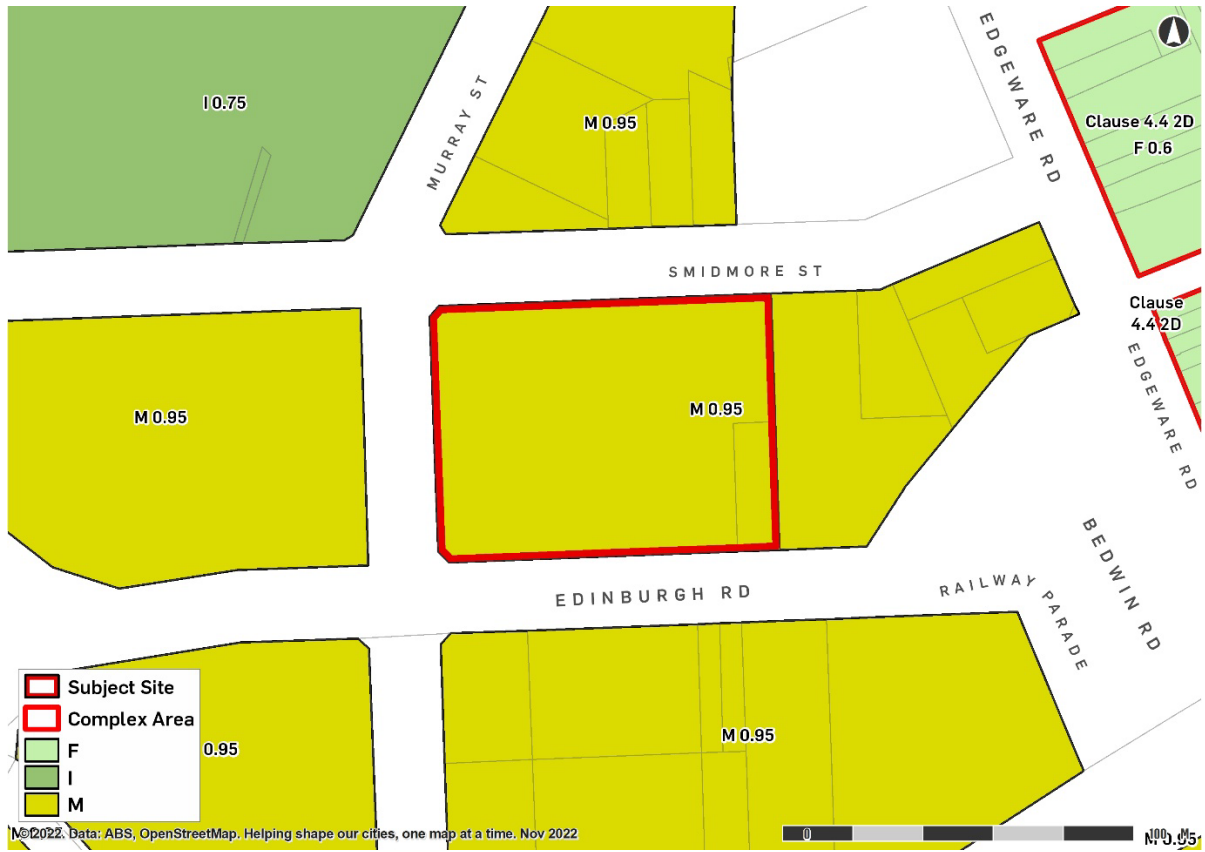
Provision	Complies
	<ul style="list-style-type: none"> ▪ Floor levels of the proposed development comply with the required flood planning level ▪ Loss of flood storage is compensated through the provision of storage under the building and partly along the driveway. This is likely to minimise adverse impacts due to the development. ▪ Provision of a flood gate at the entrance to the existing building would lower the flood risk to that building.
<p><u>Acid Sulfate Soils (clause 6.1)</u></p> <p>Class 2</p>	<p>An Acid Sulfate Soils Management Plan will be prepared if required at the DA stage to address any works below the natural ground surface or works by which the water table is likely to be lowered.</p>
<p><u>Earthworks (clause 6.2)</u></p> <p>Earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.</p>	<p>Earthworks requires for the future redevelopment of the site in accordance with the proposed plan amendment will be addressed in detail at the DA staged and based on the final design.</p>
<p><u>Stormwater management (clause 6.3)</u></p> <p>Development consent must not be granted unless the consent authority is satisfied that the development avoids a significant adverse impact of stormwater runoff on adjoining properties.</p>	<p>Stormwater management for the future redevelopment of the site in accordance with the proposed plan amendment will be addressed in detail at the DA stage.</p>
<p><u>Additional local provisions</u></p>	<p>The draft Planning Proposal seeks to an additional clause that permits:</p> <ul style="list-style-type: none"> ▪ a building on the site to exceed the floor space ratio by an amount no greater than 2.25:1 if the building is used for self-storage units. ▪ a building on the site to not exceed a maximum building height of 30m (RL34.53) ▪ a minimum of 7.5% of the site area to be provided as deep soil planting

Figure 10 Height of Building Map



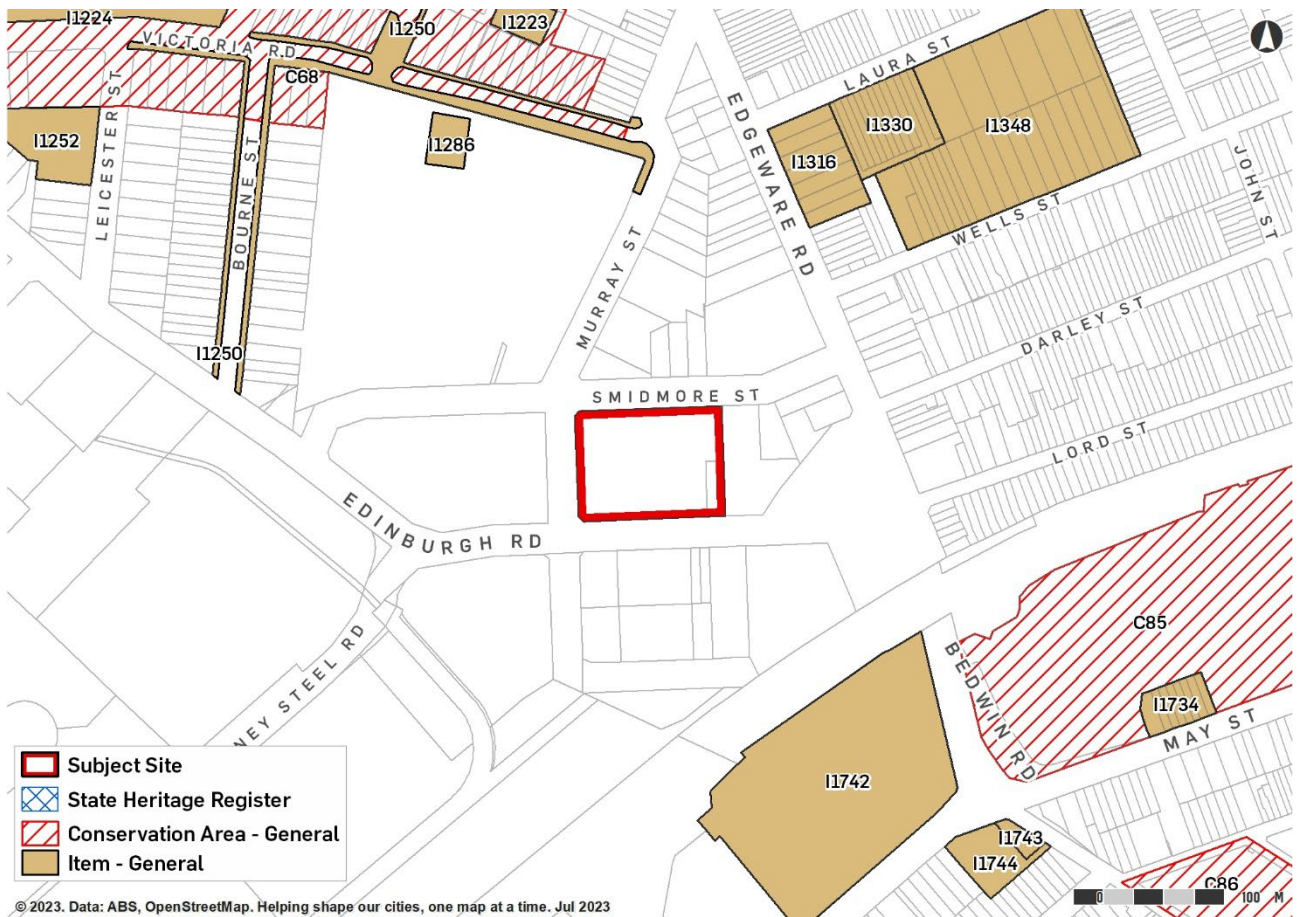
Source: Urbis, 2022

Figure 11 Floor Space Ratio Map



Source: Urbis, 2023

Figure 12 Heritage Map



Source: Urbis, 2023

5.2.2. Marrickville Development Control Plan 2011

Marrickville Development Control Plan 2011 (MDCP) provides the detailed development controls which apply to land across the former Marrickville local government area. The key controls which are relevant to the site and any future development application that would progress in accordance with the proposed land use zones is summarised in Table 8 below.

Table 8 Summary of Relevant DCP Provisions

Reference	Provision	Compliance
2.7.3 – Solar access for surrounding buildings	C3: Where adjoining sites include non-residential uses like commercial, industrial and other public/community buildings, Council will consider the merits of the case having regard to the use of those parts of such buildings that are impacted by any additional overshadowing.	The site is adjoined to the east by an existing smash repair workshop, industrial buildings and a primary school to the north, a shopping centre to the west and future development on the Sydney Metro land to the south. As demonstrated by the overshadowing analysis provided in the Urban Design Report (Appendix B), the proposed concept design will have a minimal overshadowing impact on surrounding sensitive receivers.

Reference	Provision	Compliance
	<p>C13: New buildings and additions must be sited and designed to maximise direct solar access to reduce reliance on artificial lighting and heating.</p> <p>NB Applications for commercial, industrial, and other development must demonstrate compliance with the above control, for example, through solar access diagrams.</p>	<p>The solar access of the proposed new building at 11A Edinburgh Road will be further investigated during detailed design at the DA stage. The new building will be designed to the street edge and boundary as per the existing building at 11A Edinburgh Road.</p>
<p>2.18.11.8 – Industrial development</p>	<p>C28 Landscaped area</p> <p>i. A continuous minimum landscaped area 1.5m wide across the entire frontage of the property, excluding driveways, must be provided. This width must be increased to 2 metres where the site exceeds 600m² and to 3 metres when the site exceeds 1,000m².</p> <p>ii. For corner sites, a continuous minimum landscaped area 1.5 metres wide across the entire secondary frontage of the property, excluding driveways, must be provided.</p> <p>iii. If an existing site is to be refurbished or is subject to a change of use application, the required landscaped area will be sought where it is possible without structural alterations.</p>	<p>The site area is 7,127m². The indicative concept design identifies that a landscaped area that exceeds 3m width and accounts for approx. 7.5% of the site area will be provided along the length of the Smidmore Street part of the site.</p>
<p>6.1.2 – Built form and character</p>	<p>C12: The maximum height of an industrial building must be consistent with the height of other industrial buildings in the immediate vicinity.</p>	<p>As detailed in the Urban Design Report (Appendix B), the indicative concept design height of the proposal will be 34.53 AHD (30m). This is consistent with surrounding buildings including the approved Woolworths Customer Fulfilment Centre that will have a maximum building height of 37.06 AHD.</p> <p>The introduction of a building height control of 30m (RL34.53) will enable a building form to be designed that will complement the surrounding urban character and fit within the proposed building height.</p>
	<p>C13: The maximum height of an industrial building must comply with other controls in this DCP relating to urban design, solar</p>	<p>This will be further investigated and confirmed at the DA stage.</p>

Reference	Provision	Compliance
	access, privacy and residential to industrial interface.	
	C14: Parts of the Inner West Local Government Area are affected by obstacle limitation surface (OLS) restrictions as imposed by Air Services Australia. Under Clause 6.6 of MLEP 2011 Council is required to refer development applications for proposed developments which it considers will penetrate the OLS to Air Services Australia. An applicant may choose to contact Air Services Australia directly for their opinion prior to lodging a development application.	The OLS for the site is 51 AHD. The proposed height control is 34.53AHD (30m) which is well below the OLS. The final height of the building form will be within the proposed building height control and will be confirmed at the DA stage.
	C15: Where the overall heights (including any rooftop or exposed structures in excess of 1.5 metres) of a proposed development are higher than surrounding development, a submission must be lodged with the development application supporting the proposed height. Unless proper planning reasons are presented, heights above those existing in the locality will not be supported by Council.	Surrounding buildings including the approved Woolworths Customer Fulfilment Centre will have a maximum building height of 37.06 AHD. The proposed building height control of 30m reaches 34.53 AHD. The proposed height control does not exceed the height of surrounding development and respond to the evolving character of the area.
	C19: New buildings must be designed to: <ul style="list-style-type: none"> i. Address the street and highlight any non-industrial aspects (such as the office section) of the development; ii. Avoid long blank walls facing the street and long continuous roof lines; iii. Provide regular modulation to the facade or division of massing; iv. Architecturally express the structure of the building by variation and minimal use of reflective glass; v. Visually reinforce entrances, office components and stair wells of units to create rhythm on long facades and reduce perceived scale; vi. Introduce variation in unit design within building works; 	The indicative concept design of the proposed building has been designed to be consistent with the bulk and scale of the surrounding built form. The design of the proposal will be further refined during DA stage.

Reference	Provision	Compliance
	<p>vii. Introduce solid surfaces, preferably masonry, and incorporate horizontal and vertical modulation including windows in appropriate proportions and configurations;</p> <p>viii. Address the street to which it presents, with suitable architectural elements;</p> <p>ix. Avoid long expanses of roofs; and</p> <p>x. Avoid bulky roof forms or extensive blank facades in a single material or colour.</p>	
	<p>C23: Consideration must be given to the likely impacts of proposed height and configuration of buildings on adjacent sites. Sensitivity to the resultant character of the street must be addressed at the design stage of proposed developments and addressed in the site and context analysis plan. Refer to Section 2.3 (Site and Context Analysis) of this DCP for more details.</p>	<p>An indicative concept design has considered the impacts of the proposed bulk and scale of the building on adjacent. This will be further refined and addressed as part of the DA.</p>
<p>9.39.2 – Desired future character of Marrickville Metro (Precinct 39)</p>	<p>The desired future character of the area is:</p> <ol style="list-style-type: none"> 1. To protect the identified Heritage Items within the precinct. 2. To protect the integrity and on-going retention of the existing industrial zoned land, particularly those identified as being of State significance. 3. To retain the existing employment generating land uses. 4. To ensure that the redevelopment of the Marrickville Metro shopping centre addresses existing conflicts between the operation of the centre and the amenity of surrounding residential areas. 5. To protect significant streetscapes and/or public domain elements within the precinct including landscaping, fencing, open space, sandstone kerbing and guttering, views and vistas and prevailing subdivision patterns. 6. To enhance existing streets and encourage pedestrian activity, where 	<p>As detailed in the Urban Design Report, the indicative concept design has considered how the bulk, scale and design of the proposed development would fit with the future character of the area. The proposal would also protect and retain existing industrial zoned and employment generating land. This would be further refined and addressed as part of the DA.</p>

Reference	Provision	Compliance
	<p>appropriate, through improvements to road infrastructure and landscaping.</p> <p>7. To support pedestrian and cyclist access, activity and amenity including maintaining and enhancing the public domain quality.</p> <p>8. To facilitate efficient parking, loading and access for vehicles that minimises impact to streetscape appearance, commercial viability and vitality and pedestrian safety and amenity.</p>	

5.2.3. Infrastructure Contributions

The *Inner West Local Infrastructure Contributions Plan 2023 (Contributions Plan 2023)* requires that all development with a value greater than \$200,000 that results in a net population or worker increase is required to pay Section 7.11 contributions.

The value of the future redevelopment of the site in accordance with the proposed plan amendment will be determined by a registered Quantity Surveyor in accordance with Contributions Plan 2023, and the applicable infrastructure contribution will be calculated.

6. PLANNING PROPOSAL ASSESSMENT

The Planning Proposal request has been prepared in accordance with Section 3.33 of the EP&A Act and the DPE guidelines 'Local Environmental Plan Making Guidelines' dated August 2023.

This section addresses each of the matters to be addressed as outlined in the guidelines, including:

- Objectives and intended outcomes.
- Explanation of provisions.
- Justification including need for proposal, relationship to strategic planning framework, environmental, social and economic impacts and State and Commonwealth interests.
- Draft LEP maps which articulate the proposed changes.
- Likely future community consultation.
- Project timeline.

Each of these matters has been informed by the technical deliverables lodged with the Draft Planning Proposal, including the indicative concept design and the detailed assessment reports.

6.1. PART 1: OBJECTIVES AND INTENDED OUTCOMES

The objectives of the Planning Proposal are to amend the FSR in IWLEP 2022 to deliver critically needed industrial floor space close to Sydney CBD and the Eastern Economic Corridor for self-storage.

The intended outcomes of the proposed plan amendment include:

- Support the growth of the Harbour CBD and Eastern Economic Corridor through the provision of additional industrial floor space which will support the growing demand for additional storage floor space which caters for time sensitive and last mile distribution across the eastern and south-eastern suburbs of Sydney.
- Leverage the site's strategic location to support international trade gateways, being Sydney Airport, Port Botany and the Sydney CBD, including their current operations, capacity and future growth.
- Provide increased support industry floorspace in the form of self-storage to respond to the growing domestic demand for self-storage resulting from increased dwelling density and apartment living.
- Incentivise the revitalisation of the site and contribute to addressing the shortage of self-storage space.
- Realise the development potential of the site while respecting aeronautical operations.
- Provide direct economic investment into the locality and deliver employment opportunities through future redevelopment of the site during construction and operational phases.
- Deliver improvements to the existing streetscape and site appearance and infrastructure upgrades which benefit the site and locality.

The objectives and intended outcomes for the Draft Planning Proposal are aligned with the strategic planning policies identified in Section 2.3 and discussed in further detail in Section 6.3.

6.2. PART 2: EXPLANATION OF PROVISIONS

The objectives and intended outcomes of the Planning Proposal will be achieved by amending the IWLEP 2022 as follows:

- Amend Part 6 to include an additional clause that permits:
 - a building on the site to exceed the floor space ratio by an amount no greater than 2.25:1 if the building is used for self-storage units.
 - any future redevelopment of the site is to provide a minimum of 7.5% of the site area as deep soil planting
- Identifying the site on the Inner West Local Environmental Plan 2022 'Key Sites' map.

- Include a 30m (RL34.53) height control on the Height of Building Map in the Inner West Local Environment Plan 2022.

6.2.1. Rationale for Proposed Statutory Amendments

This Planning Proposal makes the case for change to amend the statutory development standard that apply to the site.

Presently the site has a Floor Space Ratio control of 0.95:1 and no Height of Building control or deep soil control which is consistent across the majority of the Marrickville Industrial Area. However, by increasing the Floor Space Ratio and Height of Building control for redevelopment of the site for self-storage will enable the site to deliver additional employment floorspace. This will support both local residents and businesses without adversely affecting the surrounding road networks or flood storage capacity. Further, the inclusion of a deep soil provision will ensure future redevelopment of the site assists in mitigating urban heat island impacts and positively contributes to the greening and tree canopy of the Marrickville Industrial Area.

The additional employment floorspace is aligned to the strategic direction for the Marrickville Industrial Area which seek to retain and manage employment lands, particularly close to key infrastructure including Sydney Airport and Port Botany. Growth in last-mile storage to support businesses within the Inner West and Inner Sydney. The Economic Strategic Positioning Paper prepared by Urbis (**Appendix F**) identifies that the proposed additional self-storage floor space on the site will:

- Be supported by heigh demand / occupancy within the existing facility.
- Help to address a shortage of self-storage space in the Inner West.
- Support the growing population within the Inner West.
- Support business investment in the region and facilitated the higher density utilisation of the subject site for industrial uses.
- Provide storage to service the increasing number of residents living in new apartments.
- Addressing demographic trends such as increased downsizers, smaller household sizes and greater migration.
- Provide storage to existing and future businesses in the Inner West LGA.
- Deliver construction and more ongoing jobs in Marrickville.
- Generate significant expenditure (direct and indirect) and value add to the economy.

These benefits are aligned to the objectives of strategic policy as discussed in detail in **Section 6.3** below.

6.3. JUSTIFICATION OF STRATEGIC AND SITE-SPECIFIC MERIT

6.3.1. Section A – Need for the planning proposal

Q1. *Is the planning proposal a result of an endorsed local strategic planning statement, strategic study or report?*

Yes – The Planning Proposal has been prepared to be consistent with the Inner West Local Strategic Planning Statement. In accordance with the LSPS, the Proposal supports the retention, protection and increase of industrial lands. The Proposal will provide an increase in the capacity of industrial lands in the Inner West LGA, supporting a thriving local economy.

The Proposal seeks to deliver additional industrial floor space capacity to be utilised as a self-storage premises. It will provide additional space for the temporary storage of a range of items and support the reduction of waste and promote opportunities to reuse and recycle items. The Proposal will result in the delivery of additional self-storage space to support local businesses and residents. There is a shortage of self-storage space in the Inner West, and this was identified in the Economic Strategic Positioning Paper attached in **Appendix F**. The Proposal will assist in supporting the increased number of residents living in apartments whilst also supporting business investment in the region.

The Proposal does not seek any change to the existing E4 General industrial land use zoning. The proposed FSR uplift, Height of Building control and deep soil provision will facilitate the delivery of additional industrial

floor space to support the retention and management of industrial zoned land within the Inner West LGA; whilst also helping contribute to mitigating urban heat island impacts and greening Marrickville Industrial Area. It will optimise the potential of the site to provide employment opportunities and provide a land use which will support the successful operation of other local businesses which are also operating to achieve this goal.

The proposed plan amendment is considered entirely consistent with the local planning priorities. It provides a significant investment in the Inner West LGA which will support additional local jobs and the retention of existing industrial land to strengthen the economic operations of the Eastern Harbour City and Inner West.

Q2. *Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?*

Yes – The Planning Proposal will provide a clear and concise approach to delivering additional industrial/self-storage floorspace to support the Sydney CBD, Sydney Airport, Port Botany, and the Inner West. The proposed update to the existing FSR map will enable an additional 14,409m² GFA to be delivered in the future redevelopment of the site.

It is highly unlikely the extent of additional floorspace proposed via the Planning Proposal could be achieved through a Clause 4.6 variation as part of a Development Application due to the extent of variation and compliance with the ‘Part 5 test’ established by the Land and Environment Court.

Based on the above, it has been demonstrated that the Planning Proposal as outlined within this report is the most appropriate approach to realising the objectives and intended outcomes as described within Section 6.1, delivery increased employment opportunities at a highly suitable site in a timely manner.

6.3.2. Section B – Relationship to strategic planning framework.

Q3. *Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?*

Yes – the Planning Proposal will give effect to the objectives and actions of the applicable relevant priorities in the Greater Sydney Region Plan, the Eastern City District Plan, Future Transport Strategy and the Greater Cities Commission Industrial Lands ‘Retain and Manage’ Policy Review as outlined in detail below.

Greater Sydney Region Plan: A Metropolis of Three Cities

The Planning Proposal is consistent with the relevant objectives of the Greater Sydney Region Plan, as discussed in detail in Table 9. Overall, it is considered that the Planning Proposal is entirely aligned and consistent with the Greater Sydney Region Plan and will contribute to the delivery of its objectives.

Table 9 Consistency with Greater Sydney Region Plan

Objectives	Consistency
Objective 15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive	The site is located in the major industrial area of Marrickville which helps provide essential trade and services that support specialised economic activities. It is located close to Sydney Airport and Port Botany which are identified as major asset and trade gateways within the Eastern Economic Corridor. The proposed plan amendment seeks to deliver additional floorspace and increased job opportunities within walking distance of Sydenham and St Peters railway stations.
Objective 23: Industrial and urban services land is planned, retained and managed	The proposal does not seek any change to the existing E4 General Industrial zoning. The proposed amendment to permit an increased FSR and height of building control for self-storage units would facilitate retention and optimal use of existing industrial land within the Eastern Harbour City. It would support the growing demand for additional storage floor space close to Sydney Airport, Port Botany and the Sydney

Objectives	Consistency
	CBD, and time sensitive and last mile distribution across the eastern and south-eastern suburbs of Sydney.

Our Greater Sydney 2056: Eastern City District Plan

The Planning Proposal is consistent with the relevant objectives of the Greater Sydney Region Plan, as discussed in detail in Table 9. Overall, the proposed FSR uplift is considered entirely consistent with the planning priorities outlined within the District Plan and will contribute to the delivery of the identified actions to achieve its desired outcomes.

Table 10 Consistency with Eastern City District Plan

Objectives	Consistency
Planning Priority E7: Growing a stronger and more competitive Harbour CBD	The proposed increase in FSR for self-storage units will accommodate additional industrial floorspace to support the Harbour CBD and Eastern Economic Corridor. The site is positioned within key employment lands which are in close proximity to major logistics hubs around Port Botany, the Sydney CBD and the growing residential population within the Inner West which has more recently seen housing growth in medium density residential dwellings. The Proposal will provide key storage facilities which can support surrounding businesses, as well as last-mile storage for operators within the Inner West and Inner Sydney.
Planning Priority E12: Retaining and managing industrial and urban services land	The proposed plan amendment seeks to deliver additional industrial floor space capacity for self-storage space to accommodate the strong demand within the locality. The increase in self-storage FSR on the site will enable the site to increase its contribution of industrial floorspace which is entirely consistent with this key Planning Priority. Further, as National Storage provides storage to commercial businesses, the facility would improve its contribution to supporting local urban service lands by providing a support function to these businesses.
Planning Priority E13: Supporting growth of targeted industry sectors	The proposed plan amendment will provide additional industrial floor space and storage space to support emerging industries including boutique breweries, coffee roasters and other artisans that are becoming more prevalent in Marrickville, Erskineville and the Inner West and Inner Sydney.

Table 11 Consistency with Future Transport Strategy

Objectives	Consistency
P1.2 Support growth around public transport	In accordance with Future Transport the Proposal will support integrated land use and transport planning, providing higher density development and employment around a public transport node.

Table 12 Consistency with Industrial Lands 'Retain and Manage' Policy Review

Objectives	Consistency
Draft Guiding Principle 1: Securing capacity of industrial and urban services land	The Proposal seeks to allow for sufficient and appropriate industrial space to serve the various functions of the Marrickville industrial area now and into the future. In accordance with Principle 1, the proposed plan amendment seeks to allow space for business to grow to meet market demand, long term population needs and provide local jobs. The Proposal will provide diverse urban industrial land through enabling self-storage space to service residents and businesses in the Marrickville area and Greater Sydney context.
Draft Guiding Principle 2: Supporting sustainability	In accordance with the Principle, the Proposal will minimise commute and freight vehicle travel times by providing enhanced industrial space close to key population centres, to support environmental management services and a shift towards a circular economy. The proposed plan amendment will enable self-storage to be provided for residents and businesses in a highly accessible location, minimising trip generation and reducing carbon emissions.
Draft Guiding Principle 3: Optimising diverse supply chains supported by infrastructure	In accordance with the Principle, the Proposal will enhance industrial land in close proximity to a high number of customers to enable businesses to create more localised distribution networks, including in response to market demand for rapid last mile delivery options. The proposed plan amendment supports efficient supply chain solutions for the Inner West and Eastern City District. Consistent with the Principle, the proximity of the site to road and rail transport infrastructure and the Inner West's growing population centres will support the optimisation of freight supply chains for Greater Sydney.
Draft Guiding Principle 4: Boosting economic activity to support current and emerging industries	In accordance with this Principle, the site is located in a highly accessible location to residents and other businesses to maximise access to employment opportunities. The proposed plan amendment will enable the provision of self-storage space on site to service a wide range of businesses, supporting the clustering of upstream and downstream businesses resulting in co-location and agglomeration benefits for industries.
Draft Guiding Principle 5: Encouraging innovation	In accordance with the Principle, the Proposal will support the appropriate uplift of industrial space at the site to accommodate a new use that is compatible with the local area, offering adaptability and resilience, servicing the potential for new businesses and boosting productivity on existing industrial land. The proposed plan amendment

Objectives	Consistency
	will enable the provision of a greater diversity of industrial uses in Marrickville to meet the needs of all users, at the right location.
Draft Guiding Principle 6: Providing business certainty	In accordance with the Principle, the Proposal will support the continued investment and productivity of the existing industrial site. The self-storage use is compatible with the local area and will support the role and operation of the Marrickville industrial area. The Marrickville industrial area is strategically located to transport infrastructure and nearby centres and the Proposal will support the ongoing economic function of the industrial site.
Draft Guiding Principle 7: Servicing population needs	In accordance with the Principle, the Proposal will support and enhance the ongoing operation on an industrial site that is well-located to provide urban services for local residents and the broader District. The site is highly accessible to residents and businesses to provide a self-storage service and support last mile distribution, helping to achieve the 30-minute city. In addition, the site is highly accessible to the local workforce for employment opportunities.

Assessment Criteria for Strategic and Site-Specific Merit

The Planning Proposal addresses the Assessment Criteria within the DPE guidelines as summarised in Table 13.

Table 13 Assessment of Strategic and Site-Specific Merit

Provision	Consistency
Does the proposal have strategic merit? Does the proposal:	
<i>Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, and/or corridor/precinct plans applying to the site.</i>	Yes – the Draft Planning Proposal will give effect to the Greater Sydney Region Plan and the Eastern City District Plan as outlined in detail in Table 9 and Table 10.
<i>This includes any draft regional, district or corridor/precinct plans released for public comment or a place strategy for a strategic precinct including any draft place strategy; or</i>	
<i>Demonstrate consistency with the relevant LSPS or strategy has been endorsed by the Department or required as part of a regional or district plan; or</i>	Yes – the Draft Planning Proposal is entirely consistent with the <i>Our Place Inner West: Local Strategic Planning Statement</i> as outlined in Table 14.

Provision	Consistency
<i>Respond to a change in circumstances that has not been recognised by the existing planning framework</i>	N/A – The Draft Planning Proposal does not rely upon a change in circumstances that has not been recognised by the existing strategic planning framework as identified above. It has demonstrated the Draft Planning Proposal is consistent with the Greater Sydney Region Plan, the Eastern City District Plan and the Inner West LSPS.
Does the proposal have site-specific merit? Does it give regard and assess impacts to:	
<i>The natural environment on the site to which the proposal relates and other affected land (including known significant environmental areas, resources or hazards)</i>	All natural environment matters can be satisfactorily addressed as part of the DA for the development. Environmental investigation reports including flooding, acid sulfate soils and geotechnical assessments have been prepared and indicate the site is suitable for future development. Refer to Section C – Environmental, social and economic impacts which provides detailed commentary on this.
<i>Existing uses, approved uses, and likely future uses of land in the vicinity of the land to which the proposal relates.</i>	The site is located within an industrial precinct and the proposal will retain industrial uses on the site.
<i>Services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision</i>	As discussed in Section 6.3.4 , the site is well serviced by existing infrastructure and within an existing industrial precinct.
The site-specific merit of the Planning Proposal is discussed further in Section C – Environmental, social and economic impacts .	

Q4. *Is the planning proposal consistent with a Council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?*

Yes – The Planning Proposal has been prepared to be consistent with *Our Place Inner West: Local Strategic Planning Statement*. The Draft Planning Proposal is considered consistent with the local planning priorities. It provides for the protection of industrial land to drive significant investment in the Inner West LGA. The proposed additional floorspace will provide additional self-storage space to support the growing demand for additional storage floor space close to Sydney Airport, Port Botany and the Sydney CBD and time sensitive and last mile distribution across the eastern and south-eastern suburbs of Sydney.

The Proposal is consistent with the relevant LSPS planning priorities as identified in Table 14.

Table 14 Consistency with Inner West LSPS

Objectives	Consistency
Planning Priority 5: Inner West is a zero-waste community	The proposed plan amendment seeks to deliver additional industrial floor space capacity to be utilised as a storage premises. It will provide

Objectives	Consistency
	additional space for the temporary storage of a range of items and support the reduction of waste and promote opportunities to reuse and recycle items.
Planning Priority 9: A thriving local economy	The proposed plan amendment does not seek any change to the existing E4 General industrial land use zoning. The proposed FSR uplift for self-storage units will facilitate the delivery of additional industrial floor space to support the retention and management of industrial zoned land within the Inner West LGA. It will optimise the potential of the site to provide employment opportunities and provide a land use which will support the successful operation of other local businesses which are also operating to achieve this goal.

Inner West 2036: Community Strategic Plan

The Planning Proposal is consistent with the relevant objectives and strategies of the *Inner West 2036: Community Strategic Plan*, as discussed in detail in Table 15.

Table 15 Consistency with Inner West CSP

Objectives	Consistency
Outcome 1.6: Inner West us a zero-waste community with an active share economy	The proposed amendment will deliver additional storage floorspace in the Inner West. This will provide additional capacity for the temporary storage of items and support the reduction of waste and promote opportunities to reuse and recycle items.
Outcome 3.3: The local economy is thriving	The proposed plan amendment does not seek to change the existing E4 General Industrial land use zoning. It will support the retention and management of industrial zoned land within the Inner West LGA and provide self-storage floorspace to support local businesses and increased last-mile storage for a range of business operating in the Inner West and Inner Sydney.

Inner West Employment and Retail Lands Strategy

The Planning Proposal is consistent with the relevant strategies of the *Inner West Employment and Retail Lands Strategy* as detailed in Table 16.

Table 16 Consistency with Inner West Employment and Retail Lands Strategy

Strategy	Consistency
Strategy 1.6: Diversify business activity	The proposed amendment will deliver additional space for a storage premises. This will help to support the growth of local businesses and home industries by providing additional storage capacity for the storage of materials and stock.
Strategy 2.2: Protect employment lands from being eroded by conflicting and incompatible uses	The proposed plan amendment does not seek to change the existing E4 General Industrial zoning of the site. It will increase the floorspace supply of industrial land in the inner west LGA and

Strategy	Consistency
Strategy 2.3: Retain a diversity of industrial land, urban services land and employment generating uses	will ensure the retention of industrial zoned land in a key employment land area of the Inner West LGA. The proposed plan amendment does not seek to change the existing E4 General industrial land use zoning. Given the size of the site is over 7,000m ² it is a significant land holding that will support the retention and management of industrial zoned in the inner west LGA
Strategy 2.4: Floor space is flexible and adaptable	This strategy identified the opportunity to review and identify suitable sites where additional employment floor space can be accommodated. The Proposal is wholly aligned with this strategic objective, seeking to increase the FSR on the site to accommodate increased self-storage floorspace which is of itself an employment land use, as well as providing a key support service to the viability of employment uses within the Inner West.
Strategy 2.5: Maximise employment outcomes when negotiating outcomes from urban renewal/infrastructure projects	The proposed plan amendment will increase the amount of industrial floor space in the key Marrickville-Sydenham Employment precinct. It will maintain the existing E4 General Industrial land zoning and provide additional employment capacity adjacent to the Sydney Metro South Tunnel Boring Site and future Sydney Metro Sydenham to Bankstown line.

Inner West Integrated Transport Strategy

The Planning Proposal is consistent with the relevant principles of the *Inner West Employment and Retail Lands Strategy* as detailed in Table 17.

Table 17 Consistency with Inner West ITS

Principle	Consistency
Principle 1: Plan land use to support active and sustainable transport for reduced travel times and distances	The proposed plan amendment will deliver additional storage floorspace located in close proximity to St Peters and Sydenham Railway Stations. With the introduction of the future bike link connection along Sydney Steel Road and Edinburgh Road, this will help support the use of active and sustainable transport to access the site.
Principle 6: Manage freight and goods delivery network to enhance efficiency and Inner West liveability	The proposed plan amendment will provide additional storage floorspace that may be used by time sensitive and last mile distribution services. The site is located in close proximity to key freight routes including Princes Highway and the WestConnex St Peters Interchange.

Overall, it is considered that the Draft Planning Proposal is consistent with the Inner West LSPS, Inner West Employment and Retail Lands Strategy, Inner West Community Strategic Plan and Inner West Integrated Transport Strategy in accordance with the LEP Guideline.

Q5. Is the planning proposal consistent with applicable State and regional studies or strategies?

Yes – The Planning Proposal is consistent with following State and regional studies, as discussed in **Section 6** of this report:

- *A Metropolis of Three Cities: Greater Sydney Region Plan (Table 9)*
- *Eastern City District Plan (Table 10)*
- *Future Transport Strategy (Table 11)*
- *Industrial Lands ‘Retain and Manage’ Industrial Review (Table 12).*

Q6. Is the planning proposal consistent with applicable State Environmental Planning Policies?

Yes – The Planning Proposal is consistent with relevant State Environmental Planning Policies (**SEPP**) as identified and discussed in Table 18.

Table 18 Consistency with SEPPs

Relevant Document	Consistency
SEPP (Biodiversity and Conservation) 2021	<p><i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> relates to biodiversity and conservation planning matters. As the site is located within an established industrial precinct, this SEPP is not relevant to the planning proposal request.</p> <p>There are currently no trees on the site. The planning proposal proposes to provide 7.5% of the site as deep soil area. This will provide trees and landscaping to increase the existing urban tree canopy coverage in the surrounding area and mitigate any potential urban heat island impacts.</p>
SEPP (Resilience and Hazards) 2021	<p><i>State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)</i> provides the planning framework for the management of contaminated land in NSW.</p> <p>The site is zoned E4 General Industrial and is in an established industrial precinct. Clause 4.6 of the Resilience and Hazards SEPP states that a consent authority must not consent to development unless it has considered whether the land is contaminated and if required, if it is satisfied that the land will be remediated before the land is used for that purpose.</p> <p>During detailed design of the proposal at the DA, a PSI will be undertaken to confirm whether the land is contaminated.</p>
SEPP (Sustainable Buildings) 2022	<p><i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> encourages the design and delivery of more sustainable buildings. It sets sustainability standards for residential and non-residential developments and starts the process of measuring and reporting on the embodied emissions of construction materials. Chapter 3 of the SEPP outlines the standards for non-residential development to minimise waste and energy consumption.</p>

Relevant Document	Consistency
	The planning proposal proposes to provide 7.5% of the site as deep soil area. During detailed design of the proposal at the DA stage, opportunities to explore sustainability measures will be undertaken.

Q7 *Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?*

Yes – The Planning Proposal is consistent with relevant Ministerial directions under section 9.1 of the EP&A Act as identified and summarised in Table 19.

Table 19 Consistency with Section 9.1 Directions

Local Planning Directions	Assessment	Consistency
1. Planning Systems		
1.1 Implementation of Regional Plans	The Draft Planning Proposal will give effect to the Greater Sydney Region Plan and the Eastern City District Plan. It is consistent with the planning principles, directions and priorities contained in the Region Plan as outlined in Section 6.3.	Yes
1.2 Development of Aboriginal Land Council Land	Not applicable to this Planning Proposal.	N/A
1.3 Approval and Referral Requirements	Not applicable to this Planning Proposal.	N/A
1.4 Site Specific Provisions	Not applicable to this Planning Proposal.	N/A
1.5 Parramatta Road Corridor Urban Transformation Strategy	Not applicable to this Planning Proposal.	N/A
1.6 Implementation of North West Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable to this Planning Proposal.	N/A
1.7 Implementation of Greater Parramatta Priority Growth Area	Not applicable to this Planning Proposal.	N/A

Local Planning Directions	Assessment	Consistency
Interim Land Use and Infrastructure Implementation Plan		
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor	Not applicable to this Planning Proposal.	N/A
1.10 Implementation of the Western Sydney Aerotropolis Plan	Not applicable to this Planning Proposal.	N/A
1.11 Implementation of Bayside West Precincts 2036 Plan	Not applicable to this Planning Proposal.	N/A
1.12 Implementation of Planning Principles for the Cooks Cove Precinct	Not applicable to this Planning Proposal.	N/A
1.13 Implementation of St Leonards and Crows Nest 2036 Plan	Not applicable to this Planning Proposal.	N/A
1.14 Implementation of Greater Macarthur 2040	Not applicable to this Planning Proposal.	N/A
1.15 Implementation of the Pymont Peninsula Place Strategy	Not applicable to this Planning Proposal.	N/A
1.16 North West Rail Link Corridor Strategy	Not applicable to this Planning Proposal.	N/A
2. Design and Place <this Focus Area was blank when the directions were made>		
3. Biodiversity and Conservation		
3.1 Conservation Zones	Not applicable to this Planning Proposal.	N/A
3.2 Heritage Conservation	<p>The site has no identified or known items of European or Aboriginal significance. However, it is close to other listed items including:</p> <ul style="list-style-type: none"> ▪ Local Heritage Item I1742: Waugh & Josephson industrial buildings former – Inter-war functionalist workshop, including interiors, showroom and offices ▪ Local Heritage Item I1316: St Pius Church, Church Hall and Presbytery, including interiors 	

Local Planning Directions	Assessment	Consistency
	<ul style="list-style-type: none"> ▪ Local Heritage Item I1286: Mill House, including interiors ▪ Local Heritage Item I1250: Brick paving along Murray Street and Victoria Road. 	
3.3 Sydney Drinking Water Catchments	Not applicable to this Planning Proposal.	N/A
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	Not applicable to this Planning Proposal.	N/A
3.5 Recreation Vehicle Areas	Not applicable to this Planning Proposal.	N/A
3.6 Strategic Conservation Planning	Not applicable to this Planning Proposal.	N/A
3.7 Public Bushland	Not applicable to this Planning Proposal.	N/A
3.8 Wilandra Lakes Region	Not applicable to this Planning Proposal.	N/A
3.9 Sydney Harbour Foreshores and Waterways Area	Not applicable to this Planning Proposal.	N/A
3.10 Water Catchment	Not applicable to this Planning Proposal	N/A
4. Resilience and Hazards		
4.1 Flooding	A Flood Impact Assessment has been prepared (Appendix D) which details flood requirements as per the Councils Flood Management requirements and the NSW Floodplain Development Manual. Flood mitigation measures have been incorporated into the concept design and this is detailed in Section C below and in the Flood Impact Assessment.	Yes
4.2 Coastal Management	Not applicable to this Planning Proposal.	N/A
4.3 Planning for Bushfire Protection	The site is not identified as bushfire prone land.	Yes
4.4 Remediation of Contaminated Land	This Planning Proposal does not seek to change the E4 General Industrial zone or the use of the site as a self-storage premises. Therefore, it is considered that the site is suitable for its intended use.	Yes
4.5 Acid Sulfate Soils	An Acid Sulfate Soils assessment has been prepared (Appendix E). The assessment found that the soils do not	Yes

Local Planning Directions	Assessment	Consistency
	meet the definition of acid sulfate soils (ASS) or potential acid sulfate soils (PASS) and that preparation of an Acid Sulfate Soils Management Plan is not required. Further investigation will be undertaken at DA stage when the extent of soil disturbance is known.	
4.6 Mine Subsidence and Unstable Land	Not applicable to this Planning Proposal.	N/A
5. Transport and Infrastructure		
5.1 Integrating Land Use and Transport	<p>The Planning Proposal is consistent with the direction for the following reasons:</p> <ul style="list-style-type: none"> ▪ The site benefits from access to public transport including Sydenham Train Station and local bus services, supporting access to jobs and services and a reduction in trips by car. ▪ The Draft Planning Proposal supports the 30-minute city and a reduction in travel demand with jobs being delivered in an accessible location. ▪ The Proposal will support the efficient movement of freight through providing storage space for businesses in a location accessible to the regional road network and a wide Greater Sydney delivery catchment. ▪ The additional industrial floorspace and complementary land use activities will provide for increased access to employment opportunities and business services within the Inner West LGA. 	Yes
5.2 Reserving Land for Public Purposes	Not applicable to this Planning Proposal.	N/A
5.3 Development Near Regulated Airports and Defence Airfields	The site is located approximately 2km from Sydney airport. The industrial land use is compatible with current and future airport operations. The proposal is therefore acceptable and will not impact on the effective and safe operation of the airport.	Yes
5.4 Shooting Ranges	Not applicable to this Planning Proposal.	N/A
6.1 Residential Zones	Not applicable to this Planning Proposal.	N/A
6.2 Caravan Parks and Manufactured Home Estates	Not applicable to this Planning Proposal.	N/A
7. Industry and Employment		

Local Planning Directions	Assessment	Consistency
7.1 Business and Industrial Zones	<p>The Draft Planning Proposal does not seek to change the E4 General Industrial zone provisions.</p> <p>The proposed amendment to increase the current maximum FSR and include a height of building control will facilitate the retention and optimal use of existing industrial land within the Eastern Harbour City and support the growing demand for additional industrial floor space close to Sydney Airport, Port Botany, and the Sydney CBD.</p> <p>In accordance with the Direction, the Proposal will:</p> <ul style="list-style-type: none"> ▪ support employment growth in a suitable location, providing increased job opportunities highly accessible by public transport; ▪ protect employment land in the employment zone by facilitating the long-term viable operation of the site to provide employment generating development; ▪ support the viability of Marrickville centre through ensuring the long-term viability of the existing industrial site to provide self-storage services to support businesses and residents to meet market demand. 	Yes
7.2 Reduction in non-hosted short-term rental accommodation period	Not applicable to this Planning Proposal.	N/A
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	Not applicable to this Planning Proposal.	N/A
8. Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	Not applicable to this Planning Proposal.	N/A
9. Primary Production		
9.1 Rural Zones	Not applicable to this Planning Proposal.	N/A
9.2 Rural Lands	Not applicable to this Planning Proposal.	N/A
9.3 Oyster Aquaculture	Not applicable to this Planning Proposal.	N/A
9.4 Farmland of State and Regional	Not applicable to this Planning Proposal.	N/A

Local Planning Directions	Assessment	Consistency
Significance on the NSW Far North Coast		

6.3.3. Section C – Environmental, Social and Economic Impact

Q8. *Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?*

No – the Planning Proposal is highly unlikely to adversely affect any critical habitat or threatened species, populations or ecological communities or their habitats. The proposal is located in Marrickville, which is already significantly developed and some distance from any natural areas. The proposal site does not contain any vegetation on it and the vegetation is limited to street trees along the 3 street frontages.

Q9. *Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?*

Sydney Airport Obstacle Limitation Surface Level

The site is located north-west of the Sydney Airport and therefore affected by the Obstacle Limitation Surface (**OLS**) levels. The OLS across the site is 51m AHD. The Draft Planning Proposal proposes to increase density on the site, which will be accommodated through accommodating a taller building form on the eastern side of the site. The Draft Planning Proposal seeks to impose a height control of 30m (RL34.53) which is compliant with the OLS for the site.

Built Form and Scale

The Draft Planning Proposal proposes to increase the FSR control on the site from 0.95:1 to 3.20:1 and a height of building control of 30m (RL34.53) where development is for the purposes of ‘self-storage units’. This increase in density has been informed by an urban design analysis of the site and surrounding context. The Urban Design Report prepared by HAL Architects (**Appendix B**) has considered a range of matters including:

- The OLS for the Sydney Kingsford Smith Airport that limits height
- The scale and form of the surrounding approved development and streetscape
- Future vision and character of the Sydenham industrial precinct and adjacent sites.
- Street frontages surrounding the site.

As a result of these matters, an indicative concept design has been developed and accompanies the Draft Planning Proposal. A visual analysis has been undertaken of the indicative concept design and this shows that the proposal would be of a similar bulk and scale to surrounding development. A solar analysis has also been prepared that shows the indicative concept design would have a minimal impact on the surrounding sensitive receivers at the winter solstice.

As demonstrated in the urban design report, the proposed indicative concept design will be of a similar bulk and scale to surrounding development including the Marrickville Metro expansion the Woolworths Customer Fulfilment Centre. The adjacent sites to the east of the site are all industrial sites that are built to the site boundary, and this is consistent with the proposed bulk and scale of the indicative concept design.

Therefore, it is considered that the proposal will be of a scale and form that is consistent with the evolving streetscape and have a negligible impact on the bulk and scale of the existing surrounding and future streetscape of the locality. Further analysis of the built form and urban design outcomes will be undertaken during the DA process.

Flooding

HydroStorm Consulting has prepared a Preliminary Flood Assessment to assess the flood affectation of the Draft Planning Proposal. The key findings and recommendations of the flood assessment are summarised below:

- The site lies in the flood prone land of the east catchment in Marrickville. In a major flood event, once the capacity of the pipes is exceeded, overland flow paths develop and generally carry flow along the streets in the catchment. All streets surrounding the proposed development are overland flow paths with Murray Street and Edinburgh Road subject to significant flooding.
- The existing building floor level is below the flood planning level and is currently exposed to flood risk from Edinburgh Road flooding.
- The proposed building footprint would encroach on the flood storage area within the existing footprint along Edinburgh Road.
- The floor levels of the proposed development comply with the required flood planning levels for the site.
- To compensate for the loss of flood storage, the indicative concept design proposes a flood storage area located below the new building footprint. Details of this would be confirmed during detailed design at the DA stage
- A flood gate would be provided at the entrance to the existing building to lower the flood risk to that building.

The Preliminary Flood Assessment demonstrates that the Draft Planning Proposal can be supported from a flood perspective. A further detailed assessment of the potential impacts and design of mitigation measures will be required at the DA stage to confirm the preliminary findings based on the final detailed design.

Traffic

Ason Group has prepared a Preliminary Traffic Impact Assessment which assesses the potential traffic impacts of the Draft Planning Proposal. Consideration has been given to the indicative concept design and the cumulative impacts of the site as a self-storage premises on the surrounding network. The key findings and recommendations of the Traffic Impact Assessment are summarised below:

- The site is well located in terms of public and active transport access, with 3 bus stops being located within 400m walking distance, Sydenham Railway Station being 1.2km and St Peters Railway Station being 850m from the site and an existing off-road pedestrian and cycle path on Edinburgh Road.
- Council's DCP does not provide parking rates for storage facilities. As a result, the car parking provision is based on the *Aurecon Self Storage Facility Traffic and Parking Study, 2009* which assessed the parking and traffic outcomes based on surveys of 32 self-storage developments. This resulted in 21 parking spaces being required for the proposal.
- A traffic survey was undertaken of the existing development to establish trip generation rate analysis of the existing storage facilities. The average site survey trip rates have therefore been adopted as follows:
 - Weekday
 - AM peak: 0.07 trips per 100m²
 - PM peak: 0.05 trips per 100m².
- SIDRA modelling confirmed that the proposal would result in a slight increase in traffic generation during peak hours and have a negligible impact on the surrounding road network and no changes to the assessed intersections (Edinburgh Road/Bedwin Road, Edinburgh Road/Railway Parade and Edinburgh Road/Murray Street) from the baseline scenario assessed.
- All internal circulation, hardstand and parking areas will be designed in accordance with relevant Australian Standards and provide for vehicles up to and including an 8.8m medium rigid vehicle.
- All access driveways, parking areas and services will be designed in accordance with relevant Australian Standard.

The Preliminary Traffic Impact Assessment demonstrates that the Draft Planning Proposal can be supported from a traffic perspective. A further detailed assessment of the potential impacts will be required at the DA stage to confirm the preliminary findings based on the final detailed design.

Q10. Has the planning proposal adequately addressed any social and economic effects?

Yes – A strategic positioning paper was prepared as part of the Scoping Report for the Planning Proposal, and this confirmed that the proposed increase in self-storage floorspace would:

- Be supported by high demand/occupancy within the existing facility.
- Help to address a shortage of self-storage space in the inner west.
- Support the growing population within the inner west.
- Support business investment in the region and facilitate the higher density utilisation of the subject site for industrial uses.
- Provide storage space to service the increasing number of residents living in new apartments.
- Address demographic trends such as increased downsizers, smaller householder sizes and greater migration.
- Provide storage to existing and future businesses in the inner west LGA.
- Deliver construction and more ongoing jobs in Marrickville.
- Generate significant expenditure (direct and indirect) and value add to the economy.

The Planning Proposal will therefore have positive social and economic benefits for the broader community. It is considered that the proposal has addressed social and economic impacts and is in the public interest.

6.3.4. Section D – Infrastructure (Local, State and Commonwealth)

Q11. *Is there adequate public infrastructure for the planning proposal?*

Yes – there is adequate public infrastructure to service the increased demand generated by the additional self-storage floorspace as demonstrated in the technical deliverables submitted with the Planning Proposal and summarised below:

- The site is located in an existing industrial precinct with good access to public transport via Sydenham and St Peters Railway Stations. It is also located in proximity to road transport infrastructure including the St Peters Interchange, and the M4 and M5 Motorway.
- The Traffic Impact Assessment confirms that the future development of the site can be suitably accommodated within the existing road network.
- The site is within an established industrial precinct and is connected to water, power, sewer and gas. Any upgrades required to existing services will be identified during the detailed development application stage.

Based on the above, it has been clearly demonstrated that the Draft Planning Proposal is appropriate from an infrastructure perspective and will not require any significant upgrades which could impact upon local, State or Commonwealth funding arrangements.

6.3.5. Section E – State and Commonwealth interests

Q12. *What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?*

Inner West Council will undertake further consultation with State and Federal public authorities and government agencies following lodgement of the Draft Planning Proposal.

The Gateway Determination will advise the public authorities to be consulted as part of the Planning Proposal process. Any issues raised will be incorporated into this Planning Proposal following consultation in the public exhibition period.

6.4. PART 4: MAPS

The following maps contained within the IWLEP are proposed to be amended:

- Key Sites Map – Sheet 9

The proposed map amendments are provided in **Figure 13** and found in **Appendix G**. The proposed maps are consistent with the intended outcomes for the Planning Proposal as identified in **Section 6.2**.

Figure 13 Proposed Updated Key Sites Map



Source: (Urbis, 2023)

6.5. PART 5: COMMUNITY CONSULTATION

Preliminary consultation has been undertaken is outlined in **Section 3** of this report. The consultation at this stage has been limited to Council.

Division 3.4 of the EP&A Act requires the relevant planning authority to consult with the community in accordance with the gateway determination. It is anticipated that the Planning Proposal will be publicly exhibited for at least 28 days in accordance with the requirements of the DPE guidelines 'A Guide to Preparing Local Environmental Plans'.

It is anticipated that the public exhibition would be notified by way of:

- A public notice in the local newspaper(s).
- A notice on the Council website.
- Written correspondence to adjoining and surrounding landowners.

The gateway determination and Planning Proposal would be publicly exhibited at Council's offices and any other locations considered appropriate to provide interested parties with the opportunity to view the submitted documentation.

6.6. PROJECT TIMELINE

The following table sets out the anticipated project timeline. The key milestones and overall timeframe will be subject to further detailed discussions with Inner West Council and the DPE.

Table 20 Anticipated Project Timeline

Process	Indicative Timeframe
Consideration by council	4 months
Council decision	2 weeks
Gateway Determination	2 months
Pre-exhibition	2 months
Public exhibition period and Assessment	4 months
Consideration of submissions	Included in public exhibition period and assessment
Post-exhibition review and additional studies	2 months
Submission to DPE for finalisation	2 weeks
Gazettal of LEP amendment	6 months from issue of Gateway Determination

7. CONCLUSION

The planning proposal seeks to introduce an additional clause in Part 6 of the IWLEP 2022 that permits:

- a building on Lot 1 in DP607677 and Lot 67 in DP4991 to exceed the floor space ratio by an amount no greater than 2.25:1
- redevelopment on Lot 1 in DP607677 and Lot 67 in DP4991 is required to provide a minimum of 7.5% of the site as deep soil area

In addition, a maximum building height control of 30m (being 34.53 AHD) is proposed to be introduced across the site.

The Planning Proposal request has been prepared in accordance with Section 3.33 of the EP&A Act and the LEP Guidelines and is considered appropriate for the site for the following reasons:

- **Strategic Merit:**
 - The Draft Planning Proposal gives effect to the *Greater Sydney Region Plan* and the *Eastern City District Plan* and is consistent with the *Our Place Inner West: Local Strategic Planning Statement*, *Our Inner West 2036: Community Strategic Plan* and *Inner West Employment and Retail Lands Strategy*
 - The site is located in proximity to Sydney CBD, Sydney Airport and Port Botany which are major logistics hubs and the growing residential population within the Inner West which has recently seen housing growth in medium density residential dwelling. The proposal will provide key storage facilities which can support the increased residential population and surrounding businesses, as well as last-mile storage for operators within the Inner West and Inner Sydney.
 - The proposal will support the retention and protection of industrial lands within the Eastern City District and generate additional employment opportunities during construction and operation within an accessible location.
 - The proposed amendment to Part 6 of the IWLEP 2022 limits the FSR increase to self-storage units only and not to other industrial land uses which may cause unreasonable impacts to the surrounding area.
- **Site-Specific Merit:**
 - Indicative concept designs prepared for the increased 2.25:1 control to the FSR control and height of building control of 30m (RL34.53) for the site use as self-storage units demonstrates that the increase in FSR and proposed height of building control will be consistent with the evolving streetscape and have a negligible impact on the overall bulk and scale of future development
 - Future development of the site can be suitably accommodated within the surrounding transport network
 - Whilst the site is identified as being flood prone land, appropriate mitigation measures can be implemented in the detailed design of future development of the site that would ensure future development of the site would not have an unreasonable flood impact.
 - The site is located in an existing industrial precinct with good access to public transport and other infrastructure including Sydenham and St Peters Railway Stations and St Peters Interchange

Accordingly, it is **recommended** the Planning Proposal is endorsed by Council to enable a gateway determination by the DPE.

8. DISCLAIMER

This report is dated 1 November 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of National Storage (**Instructing Party**) for the purpose of Planning Proposal (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A INDICATIVE CONCEPT ARCHITECTURAL PLANS

APPENDIX B URBAN DESIGN REPORT

APPENDIX C TRAFFIC IMPACT ASSESSMENT

APPENDIX D PRELIMINARY FLOOD ASSESSMENT

APPENDIX E ACID SULFATE SOILS ASSESSMENT

APPENDIX F ECONOMIC STRATEGIC POSITIONING PAPER

APPENDIX G GEOTECHNICAL ASSESSMENT

APPENDIX H PROPOSED LEP MAPS

