

# Planning Proposal

75-85 Crown Street and 116 Princess Highway, St Peters



Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

**'Gura Bulga'**

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

By using the green and blue colours to represent NSW, this painting unites the contrasting landscapes. The use of green symbolises tranquillity and health. The colour cyan, a greenish-blue, sparks feelings of calmness and reminds us of the importance of nature, while various shades of blue hues denote emotions of new beginnings and growth. The use of emerald green in this image speaks of place as a fluid moving topography of rhythmic connection, echoed by densely layered patterning and symbolic shapes which project the hypnotic vibrations of the earth, waterways and skies.

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# 1.0 Introduction

Ethos Urban has prepared this report on behalf of the Proponent in support of a Planning Proposal to amend the *Inner West Local Environmental Plan 2022* (Inner West LEP). The Planning Proposal intends to implement planning controls to facilitate the future development of a 10-storey mixed use building at 75-85 Crown Street and 116 Princes Highway, St Peters (the site).

The Planning Proposal seeks to amend the Inner West LEP as follows:

- Increase the maximum permissible building height to RL 51m.
- Increase the maximum permissible floor space ratio (FSR) to 5:1.
- Introduce a new Part 6 Additional Local Provision to permit a limited amount of residential accommodation at ground floor level facing Crown Street, as part of a mixed-use development.

This report has been prepared in accordance with Section 3.33 of the *Environmental Planning & Assessment Act 1979* (EP&A Act), and the NSW Department of Planning and Environment's (DPE) '*Local Environmental Plan Making Guidelines*' (the LEP Making Guidelines). In accordance with the LEP Making Guidelines it provides:

- a statement of the objectives of the proposed amended LEP.
- an explanation of the provisions that are to be included in the proposed amended LEP.
- justification of strategic and site-specific merit.
- maps, where relevant, to identify the effect of the planning proposal and the area to which it applies.
- details of the community consultation that is to be undertaken on the planning proposal.
- project timeline to detail the anticipated timeframe for the LEP making process.

It should be read in conjunction with the Urban Design Report prepared by Scott Carver (**Appendix A**) and specialist consultant reports appended to this proposal (refer Table of Contents).

## 2.0 Background

### 2.1 The Proponent

The proponent for the Planning Proposal has strong local connections to the area having occupied part of the site for more than 60 years. The proponent is committed to realising a positive development outcome that transforms this underutilised and poorly presented site into a high-quality mixed-use development that makes a significant contribution to affordable housing stock in the Inner West LGA.

### 2.2 Employment Zone Reforms

In December 2021, the NSW Employment Zone Reforms were finalised by the NSW Government to introduce 5 new employment zones and 3 supporting zones. The purpose of the reform was to support a productive economy by enabling business and jobs in the locations where they are needed, consistent with outcomes sought by local and State strategic plans.

The Inner West LEP has been amended to reflect the new zones. Relevant to this Planning Proposal, part of the site located at 75-85 Crown Street was rezoned from B4 Mixed Use to MU1 Mixed Use with corresponding changes to zone objectives. The reference scheme incorporates permissible uses that are consistent with the objectives of the zone, as will be further discussed at Section 7.1.

### 2.3 Affordable Housing Reforms

On June 15, 2023, the NSW Government announced reforms to the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) to further incentivise the delivery of affordable housing. Specifically, it was announced that:

- All developments that dedicate 15% of residential floor space as affordable housing will also gain access to a 30% floor space ratio boost, and a height bonus of 30% above local environment plans.
- Housing developments with a capital investment value over \$75 million, which allocate a minimum of 15% of the total gross floor area to affordable housing, will gain access to the State Significant Development (SSD) planning approval pathway.

Council will be aware from preliminary discussions that the Planning Proposal incorporates an affordable housing offer. The incentives, came into effect late 2023, present a considerable opportunity for the Proponent to secure 30% uplift and potential SSD pathway. Under the Affordable Housing Reforms, the proposed scheme will be capable of achieving an approximate GFA of 4,197m<sup>2</sup> and a total maximum height of 16.8m. Any such scheme delivered under the Affordable Housing Reforms will not be able to deliver the same extent of housing to this site and will not meet the local strategic planning framework.

That notwithstanding, the Proponent is proceeding with a scheme that involves a relatively modest degree of change, preferring to work with Council on a development outcome that is aligned with the local strategic planning framework.

### 2.4 Pre-Lodgement Consultation

The Proponent submitted a Pre-Planning Proposal report to Council on 24 November 2021 and attended an initial feedback session on 21 February 2022 with Jennifer Gavin, Executive Planner and Daniel East, Strategic Planning Manager. Council provided written advice on 4 March 2022 which generally accepted strategic justification for the proposal. **Table 1** provides a response to Council's advice.

Further, a response to Council's letter dated 2 August 2024 and the comments from the AEDRP held 19 June 2024 is provided under separate cover.

**Table 1 – Response to Council's Written Advice**

Advice	Response
<b>Strategic Planning</b>	
Review of land use strategies included Metropolis of three cities: Greater Sydney Regional Plan, Eastern City District Plan, Inner West Local Strategic Planning Statement, Inner West Local Housing Strategy and Inner West Employment and Retail Strategy. The proposal is consistent with these strategies. Regardless of whether a proposal is consistent or inconsistent, the process of documenting the justification	The proposal's consistency with the relevant strategies is outlined in <b>Section 7.2</b> .

forms an essential component of a planning proposal. Refer to the *Local Planning Making Guideline* (DPE, December 2021) Section 2 for further details.

## Marrickville Local Environmental Plan 2011

### Zone and land use intended outcomes

The land is currently zoned B4 – Mixed Use and R1 – General Industry under the Marrickville Local Environmental Plan 2011. The proposal aims to retain the existing zoning.

Council’s preferred approach to zoning is to ensure the zone objectives and land uses match those detailed in the LEP; without necessitating addition local clauses or additional permitted uses, noting SOHOs are not a defined use.

In addition, Council aims to retain and enhance employment land and would seek evidence and implementation mechanisms that will ensure certainty of employment and economic outcomes.

The reference scheme prepared by Scott Carver involves a highly integrated development that comprises a taller shop top housing component with a lower rise base that extends along Crown Street. This is an appropriate design response that respects the urban fabric of Crown Street and provides a landmark building with diverse housing.

Due to the integrated nature of the reference scheme, it is not practical to adopt zones that neatly reflect the proposed land uses. In response, an Additional Local Provision is proposed that allows for a limited amount of residential floorspace along Crown Street at ground floor level.

Amendments to the LEP are discussed in **Section 6.2**.

### Principle development standards

FSR is inter-related to site area and Council requires clarification of the total site area and the intent to include 71 Crown Street into the proposal given Clause 4.5 (6) only significant development to be included.

The property at 71 Crown Street is now excluded from the Planning Proposal.

A review of nearby recent development on the Princes Highway and the master planned area of St Peters Triangle (Precinct 25) aligns with existing development standards. HOB in this location ranges from four to six storeys on the Princes Highway Frontage reducing to four storeys behind. The proposed HOB will significantly deviate from current established development standards for the location. It is acknowledged the location is suitable for a signature site, as is the site on the opposite corner of Campbell Street and Princes Highway. In this regard, some deviation of existing standards could be considered subject to a distinct architectural outcome.

Noted. The proposed development seeks to implement a height of building control that balances the potential of the site to deliver additional housing (including affordable housing) whilst demonstrating a positive response to existing and future urban context. Refer to **Section 8.2**.

The planning proposal must align with relevant Ministerial Directions and in this circumstance *MD5.3 – Development Near Regulated Airports and Defence Airfields* has two areas of impact.

The Planning Proposal’s consistency with the Ministerial Directions is outlined in **Section 7.2**. The total building height has been reduced so that it is below the OSL.

Firstly, the site sits between 15 and 17m Australian Height Datum (AHD) and the Operational Limitation Surface (OSL) in this location is 51m. With a proposed height of 40m the building would intrude into the OLS by approximately 6.5m.

An Acoustic Report is provided in **Appendix C** which considers aircraft noise.

Secondly, the site sits within the 25-30 ANEF and proposes to introduce increased residential densities.

## Marrickville Development Control Plan

### Dwelling Mix

The proposal deviates from Council controls and Apartment Design Guide considerations. Any resulting non-compliance should be evidenced to justify the resulting dwelling mix.

The revised dwelling mix is generally consistent with Council’s controls. Refer to **Appendix A**.

### Heritage

The site sits within Precinct 26 Barwon Park Road. DCP provisions identify numerous buildings of historical significance. The resulting planning proposal should demonstrate assessment of heritage values at a contextual level and for those directly affected.

A Heritage Impact Statement is provided in **Appendix I** and outlined in **Section 8.6**. The HIS confirms support for the Planning Proposal.

### Section 2.21 – Site Facilities and Waste Management

A detailed assessment of waste management and site facilities will be provided during the Development Application stage. Nevertheless, the Sustainability Report in



The resulting planning proposal should demonstrate compliance with Section 2.21 of the Marrickville DCP in combination with retention of employment floor space.	<b>Appendix F</b> provides a high-level assessment of waste management, demonstrating compliance with the DCP.
<b>Inner West Affordable Housing Policy</b>	
The proposal complies with Council's 2017 policy and is supported. As advised, a draft policy is underway and we will notify you when it is released for exhibition, subject to this being before submission of a refined planning proposal.	Noted. Affordable housing is discussed in <b>Section 4.1.6</b> and <b>Section 8.4</b> .
<b>Other Relevant Matters</b>	
To further support the planning proposal it is anticipated a draft Development Control Plan be prepared that will support any LEP amendment and give clarity to intended design outcomes	A draft DCP is provided in <b>Appendix M</b> . The remaining provisions of the Marrickville DCP 2011 and ADG are sufficient to accommodate any future development.
<b>Detailed Matters</b>	
<b>Strategic Merit</b>	
The Proposal is not inconsistent with: <ul style="list-style-type: none"> <li>Greater Sydney Regional Plan and Eastern City District Plan</li> <li>IW Local Strategic Planning Statement</li> <li>IW Local Housing Strategy</li> <li>IW Employment and Retail Lands Strategy</li> </ul> <p>Ensure a proposal includes a review of these strategic documents and a discussion on consistency</p>	Strategic alignment is further outlined in <b>Section 7.2</b> .
<b>Zone and land use intended outcomes</b>	
Evidence any reduction of employment GFA and propose mechanisms to ensure certainty of employment and economic outcomes while addressing interface with residential properties	The reference scheme provides evidence that there will be no loss of employment GFA.
Reconsider zoning approach and inclusion of SOHO	The reference scheme no longer includes SOHOs, but the Additional Local Provision manages residential floorspace at ground floor level.
Review DPE Employment Lands Review	Refer to <b>Section 2.2</b>
<b>Site Area</b>	
Confirm site area	The site has an area of 1,931m <sup>2</sup> as confirmed in <b>Appendix A</b> and <b>Appendix K</b> .
Remove 71 Crown Street from the proposal	71 Crown Street is now excluded.
<b>Ministerial Directions</b>	
Review the new Focus areas and revised list of MDs	The Ministerial Directions are addressed in <b>Section 7.2</b> and consultation has been undertaken in accordance with all relevant requirements.
Undertake early consultation as required	
Prepare evidence to demonstrate compliance	
<b>State Environmental Planning Policies</b>	
Ensure a proposal includes a review of relevant SEPPs, potentially the Design and Place SEPP, subject to timing	SEPPs are addressed in <b>Section 7.2</b> .
<b>Dwelling Mix</b>	
Evidence required to justify the proposed dwelling mix and comply with ADG considerations	<b>Appendix A</b> demonstrates compliance with the ADG, acknowledging that the revised dwelling mix is generally consistent with Council's requirements.
<b>Affordable Housing</b>	
Intent of proposal supported.	

Continue dialogue with council as a proposal develops.	The Planning Proposal includes a commitment to delivering 10% of all dwellings for affordable housing. This is based on current scheme GFA – and will be further discussed with Council as part of the PP assessment process.
Review draft policy during exhibition.	
<b>Road and Infrastructure</b>	
Confirm status of road acquisition/reserved lots on: <ul style="list-style-type: none"> <li>Princes Highway and Campbell Street</li> <li>Campbell Street and Crown Street</li> </ul>	Part of the site has been acquired by TfNSW for the purpose of the WestConnex tunnel. Title Deeds showing sub stratum ownership by TfNSW are provided in <b>Appendix L</b> .
<b>WestConnex</b>	
Confirm tunnel impacts in discussion with TfNSW	Since initial discussions with Council, the proponent has continued to liaise with TfNSW. Further information is provided <b>Appendix H</b> .
Prepare Air quality impact assessment and consider built form design	An Air Quality Impact Statement is provided in <b>Appendix E</b> , and it addressed in <b>Section 7.3</b> .
<b>Heritage</b>	
Demonstrate assessment of heritage values, contextual and properties	Refer to <b>Appendix I</b> and outlined in <b>Section 8.6</b> .
<b>Access and Internal Movements</b>	
Build on existing Traffic Report	Refer to <b>Appendix B</b> and <b>Section 8.5</b> .
Further analyse inbound routes	
Use of a turntable is least preferred outcome	
Access and internal movement require resolution	
<b>Height of Building</b>	
Proposal exceeds development standard by more than 200% and is unlikely to be supported in its current form	The maximum building height sought by the Planning Proposal has been reduced to RL51 (including plant overrun). The rationale for building height is outlined within the Urban Design Report at <b>Appendix A</b> .
Early consultation with relevant authorities and agencies is recommended.	Consultation has been undertaken as required. Refer to <b>Section 9.0</b>
<b>Floor Space Ratio</b>	
Proposal exceeds development standard by more than 300% and is unlikely to be supported in its current form	The maximum floor space ratio sought by the Planning Proposal has been reduced and the rationale is outlined in the Urban Design Report at <b>Appendix A</b> .
<b>Architectural Design</b>	
Location suitable for signature site/landmark building subject to achievement of a high quality, and locationally appropriate, architectural form	Noted. The reference scheme is further discussed in <b>Section 5.0</b> and assessed in <b>Section 8.2</b> .
Architecture should demonstrate a quality living environment in addition to its external architectural appearance, given noise and air quality impacts	Refer to <b>Section 8.0</b>
Noise and overlooking impacts from communal areas to the residences in Crown Street require consideration	The Concept Scheme shows how overlooking can be limited to protect visual privacy. Acoustic considerations would be further addressed as part of a future DA. Refer to <b>Section 8.2.3</b> .

Demonstrate that the guidance offered by the existing and proposed ADG has been considered, including but not limited to:

- Part 2 – Developing the controls which provides tools to support such Concept DA and Planning Proposal process when testing and determining the building envelope and the overall urban planning outcomes.
- Part 3 – Siting the development which provides guidance on the design and configuration of a residential flat building at a site-specific scale and how the proposal relates to the immediate context, neighbouring interface, public domain and maximises overall residential amenity

The Concept Scheme in **Appendix A** is generally in accordance with the ADG. A detailed assessment of the ADG will be provided during the Development Application stage.

### Public Art

Incorporate public art in collaboration with Inner West Public Art Team.

A public art contribution is more suitably addressed at the detailed DA stage however the reference scheme shows how public art could be meaningfully incorporated into the architecture of the building.

### Green Infrastructure

Proposal does not currently comply.

Review proposed Design and Place SEPP and ADG considerations.

Proposal should include discussion and approach to green infrastructure.

The revised Concept Scheme generally complies with ADG requirements, including landscaping and deep soil. Overall, the Concept Scheme provides a coordinated approach to deliver green infrastructure suitable for the site and it's constraints.

### Sustainability and Resilience

No details provided on sustainability approach or considerations including building performance, approach to building waste (recycling and reuse).

A Sustainability Report is provided in **Appendix F**.

### Adjoining Properties

Is there any potential to prepare an integrated proposal with the adjoining property on Princes Highway? The current proposal is sub-optimal from various perspectives due to the constrained location and site size. An integrated proposal would realise numerous benefits for all landowners

The Proponent has consulted with neighbouring properties however the Planning Proposal does not involve further site consolidation.

## 3.0 The Site

### 3.1 Site Description

The site consists of 3 different lots within the Inner West Local Government Area (LGA), as described in **Table 2**. It is irregular in shape and has a total area of 1,931m<sup>2</sup>. The site has a western frontage of approximately 20.3m to Princes Highway, a southern frontage of approximately 62m to Campbell Street and an eastern frontage of approximately 44.2m to Crown Street.

**Table 2 – Description of Land**

Legal Description	Address
Lot 24 DP 1249592	75 Crown Street, St Peters
Lot 21 DP 1249588	116 Princess Highway, St Peters 77 Crown Street, St Peters 81-83 Crown Street, St Peters
Lot 10 DP 1227918	85 Crown Street, St Peters

The existing development includes a range of mixed uses. The predominant use includes a light industrial, single storey masonry building. The light industrial uses have a presence on all three streets. Access to the industrial buildings is provided only from Crown Street. The northern part of the site contains a double storey Victorian style terrace. The terrace faces Crown Street. The site has a gentle slope from east to west with a difference of approximately 2m.

The site is not identified as an item of heritage significance, nor is it located within a Heritage Conservation Area (HCA) under the Inner West LEP.

An aerial view of the site is provided in **Figure 1**.



 Site Boundaries



**Figure 1 – Aerial Photo of Site**

Source: Nearmap, Ethos Urban

Photos of the site and surrounding are provided below.



View of site (in red) from Princes Highway



View of site (in red) from the corner of Princes Highway and Campbell Street



View from Crown Street of 85 Crown Street (left) and 116 Princes Highway (right)



View from Crown Street of 116 Princes Highway (left) and 75 Crown Street (right)

### 3.2 Surrounding Development and Context

The site is located within the suburb of St Peters, approximately 6km south of the Sydney CBD and 1.5km north of the Sydney Airport. The character of the area is defined by a range of uses including light industrial, shop top housing, terraces and town houses.

A description of the surrounding development is provided below.

- **North:** The Princes Highway is north of the site and is generally characterised by 2 storey light industrial buildings, 2 storey food and beverage uses and 4 - 6 storey shop top houses.
- **West:** Immediately west of the site, fronting Campbell St include 2 storey light industrial uses.
- **East:** To the east is Barwon Triangle which features two storey terraces on Campbell Street and Crown Street. Residential Flat Buildings (RFBs) and light industrial uses face Barwon Park Road. Past the Barwon Triangle is Sydney Park, a major inner-city parkland which services as a recreational space for nearby works and visitors.
- **South:** south of the site includes a range of low-density residential development which are categorised as 2 storey terraces and 1 storey detached dwellings.

Images of the surrounding areas are provided in **Figure 2**.



Terraces viewed from Crown St



Looking north of Crown Street (site on left)



Looking North on Princes Highway



Examples of Built form on Princes Highway



View looking north-east along Campbell Street (site in red)



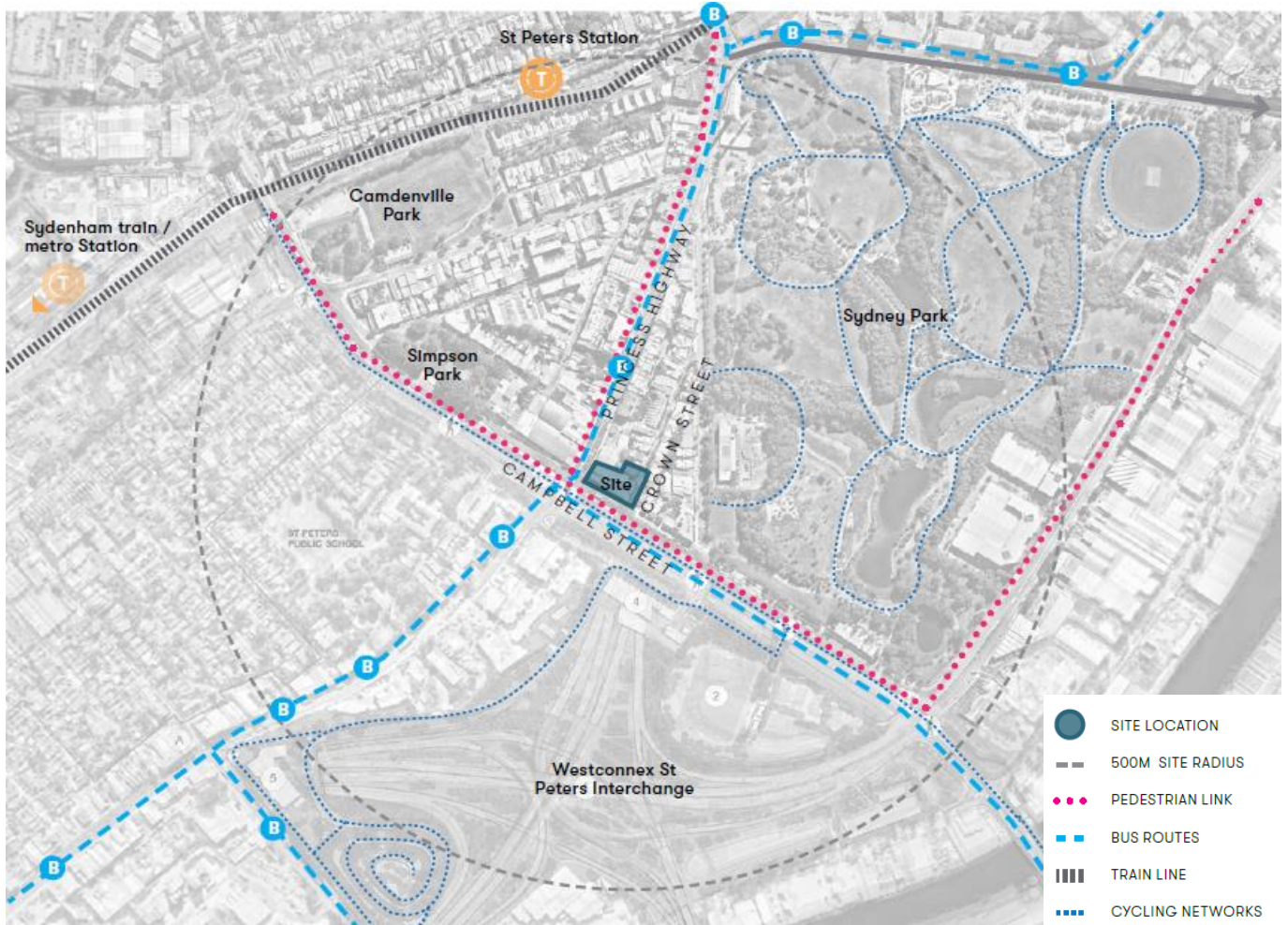
Development east of the site on Campbell Street (site in red)

**Figure 2 – Images of Surrounding Development**

Source: Ethos Urban

### 3.2.1 Public Transport and Roads

The site has good connections to multiple modes of transport. Approximately 700m north of the site is St Peters Station which provides access to the T3 Bankstown Line and is two stops away from Redfern Station. The site is also within 200m of bus stops that provide access to Sydney CBD, Mascot and the Airport. The Sydenham Metro Station is located approximately 1.5km west of the site. Princes Highway and Campbell Street contain dedicated off-road cycle paths. As illustrated in **Figure 3** and **Figure 4**.



**Figure 3 – Proximity to Active Transport Nodes**

Source: Scott Carver



**Figure 4 – Off-Road Cycle Paths on Campbell Street**

Source: Ethos Urban

Campbell Road has recently undergone significant change as part of the WestConnex interchange project. This notably involved the acquisition and demolition of residential properties directly south of the site to accommodate the widening of Campbell Street from two to six lanes, as shown **Figure 5**. The new road network provides excellent connectivity from the site to Greater Sydney.



Prior to Campbell St widening

November 2013



After Campbell St widening

Current

**Figure 5 – Changes to Campbell Street due to WestConnex**

Source: Nearmaps



### 3.2.2 Surrounding Open Space

The site benefits from walkability to large parks and open space including Sydney Park, Simpson Park, Camdenville and future above the Interchange. These spaces provide a wide range of recreational activities including bicycle and walking tracks, children playgrounds and sports grounds and will suitably cater for the future residential population contemplated by the Planning Proposal.

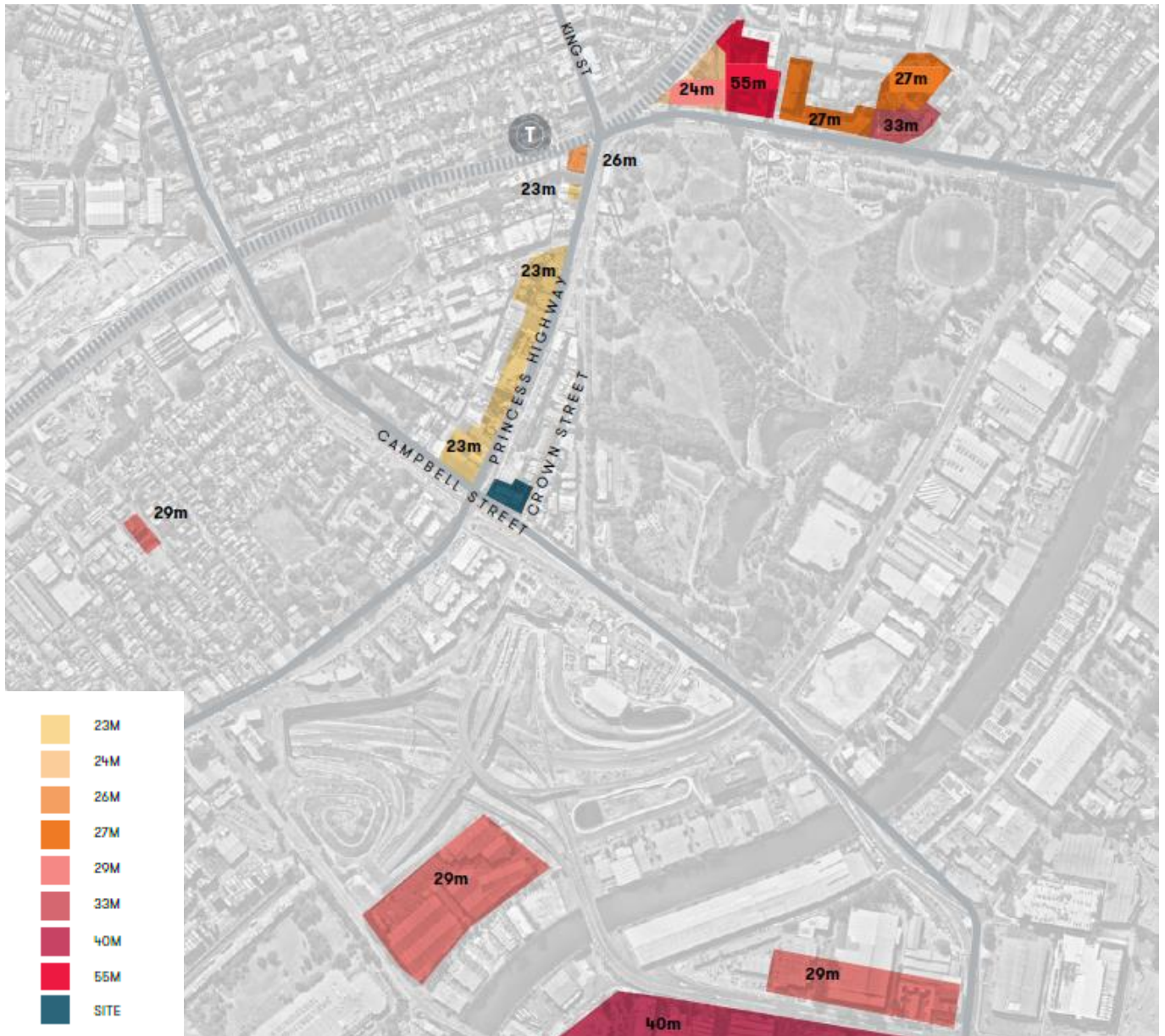


**Figure 6 – Proximity to Open Space**

Source: Scott Carver

### 3.3 Surrounding Built Form in Height

The surrounding context contains various prominent sites with generous height controls ranging between 55m to 23m. These sites are generally located around the St Peters Station and along the Princes Highway. Relevant to this document includes the allowance for the adjoining side of the Princes Highway to establish a corridor of development up to 23m in building height. The surrounding height controls are illustrated in **Figure 7**.



**Figure 7 - Height Controls of Surrounding Developments**

Source: Scott Carver

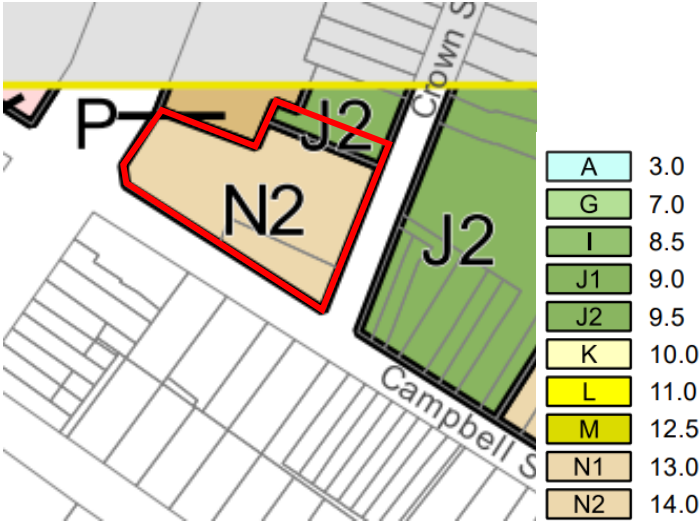
# 4.0 Current Planning Controls

## 4.1 Inner West Local Environmental Plan 2022

The key environmental planning instrument (EPI) applying to the site is the Inner West LEP. **Table 3** provides a summary of the relevant existing controls.

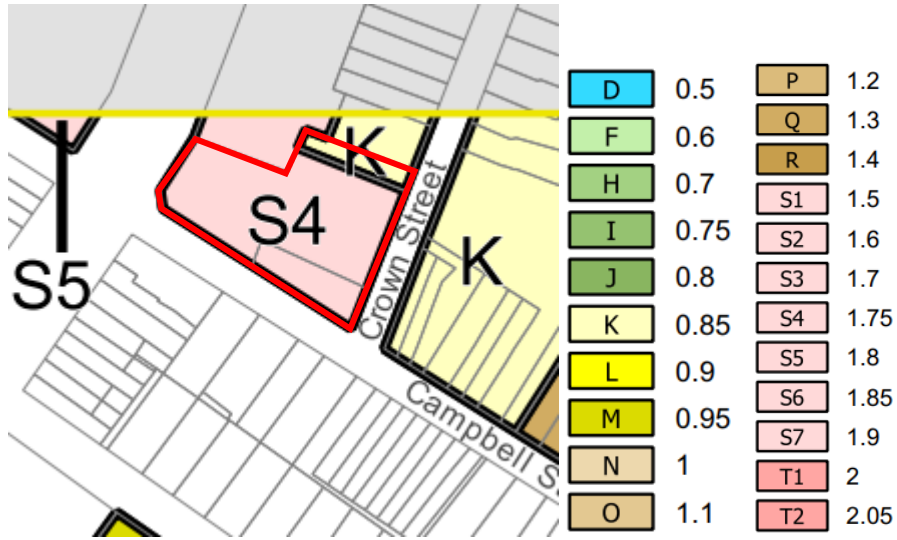
**Table 3 – Inner West LEP 2022 Controls**

Clause	Existing Control
Clause 3.2 Zone objective and Land Use Table	Part MU1 Mixed Use and part R1 General Residential
MU1 Mixed Use	<p>As a general comment, it is noted that within the MU1 Zone, residential accommodation is prohibited except for shop top housing.</p> <p><b>Permitted without consent</b></p> <p>Home occupations</p> <hr/> <p><b>Permitted with consent</b></p> <p>Amusement centres; Boarding houses; Car parks; Centre-based child care facilities; Commercial premises; Community facilities; Entertainment facilities; Function centres; Hostels; Information and education facilities; Light industries; Local distribution premises; Medical centres; Oyster aquaculture; Passenger transport facilities; Places of public worship; Recreation areas; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Shop top housing; Tank-based aquaculture; Tourist and visitor accommodation; Vehicle repair stations; Any other development not specified in item 2 or 4.</p> <hr/> <p><b>Prohibited</b></p> <p>Agriculture; Air transport facilities; Airstrips; Animal boarding or training establishments; Biosolids treatment facilities; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Environmental facilities; Exhibition homes; Exhibition</p>

Clause	Existing Control
	villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industries; Jetties; Marinas; Moorings; Mooring pens; Mortuaries; Open cut mining; Port facilities; Recreation facilities (major); <b>Residential accommodation</b> ; Rural industries; Sewage treatment plants; Sex services premises; Transport depots; Truck depots; Vehicle body repair workshops; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities
R1 General Residential	<p><b>Permitted without consent</b></p> <p>Home occupations</p>
	<p><b>Permitted with consent</b></p> <p>Attached dwellings; Bed and breakfast accommodation; Boarding houses; Centre-based child care facilities; Community facilities; Dwelling houses; Group homes; Home industries; Hostels; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Pond-based aquaculture; Residential flat buildings; Respite day care centres; Roads; Semi-detached dwellings; Seniors housing; Shop top housing; Tank-based aquaculture; Any other development not specified in item 2 or 4</p>
	<p><b>Prohibited</b></p> <p>Advertising structures; Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Biosolids treatment facilities; Boat building and repair facilities; Boat launching ramps; Camping grounds; Car parks; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Depots; Dual occupancies; Eco-tourist facilities; Emergency services facilities; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Information and education facilities; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Passenger transport facilities; Port facilities; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Research stations; Restricted premises; Rural industries; Rural workers' dwellings; Service stations; Sewage treatment plants; Sex services premises; Storage premises; Tourist and visitor accommodation; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Veterinary hospitals; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies</p>
Clause 2.5 – Additional permitted uses for particular lands	Not applicable
Clause 4.3 Height of buildings	Part 14m (where land is zoned mixed use) part 9.5m (where land is zoned general residential).
	
Clause 4.4 – Floor space ratio	Part 1.75:1 (where land is zoned mixed use) and part 0.85:1 (where land is zoned general residential).

Clause

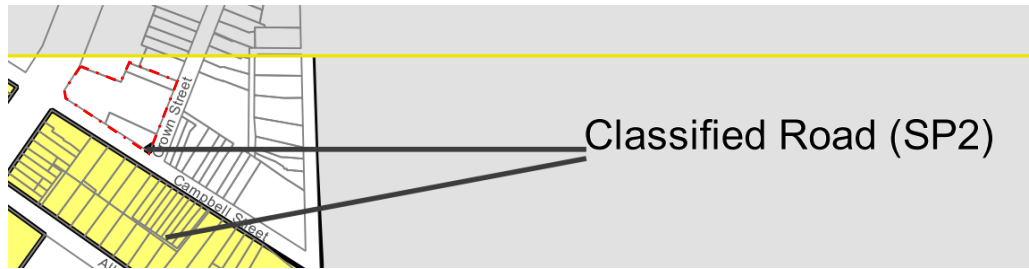
Existing Control



Clause 5.1 Relevant acquisition authority

A small corner of the site is included within the Land Reservation Acquisition map. Part of the site (sub stratum) has been acquired for the purposes of Classified Road (road tunnel). The relevant acquisition authority is Transport for NSW.

Clause 5.1A Development on land intended to be acquired for public purposes.



Clause 5.10 Heritage conservation

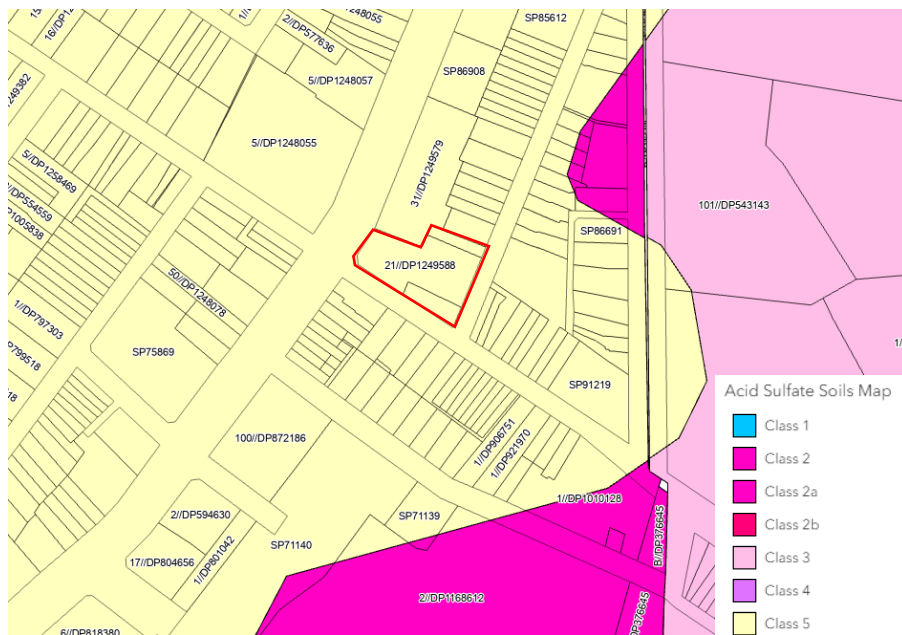
The site is not identified as an item, nor is it located in a Heritage Conservation Area.

Clause 5.21 Flood planning

Not applicable

Clause 6.1 Acid sulfate soils

Applicable – Class 5



Clause 6.4 Terrestrial biodiversity

Not applicable

Clause	Existing Control
Clause 6.7 – Airspace operations	Applicable – the site is subject to a maximum OLS of 51m AHD or 38.5m.
Clause 6.8 – Development in areas subject to aircraft noise	Applicable. In deciding whether to grant development consent to development to which this clause applies, the consent authority must— (a) consider whether the development will result in an increase in the number of dwellings or people affected by aircraft noise, and (b) consider the location of the development in relation to the criteria set out in Table 2.1 (Building Site Acceptability Based on ANEF Zones) in AS 2021:2015, and (c) be satisfied the development will meet the indoor design sound levels shown in Table 3.3 (Indoor Design Sound Levels for Determination of Aircraft Noise Reduction) in AS 2021:2015.
Clause 6.9 – Design Excellence	Applicable for development involving the construction of a new building, or external alterations to an existing building, that will result in a building that is equal to, or greater than, 14m in height. This clause will be relevant to a future development application.
Clause 6.13 Residential accommodation in business zones	Applicable for residential development within the following zones— (a) Zone E1 Local Centre, (b) Zone E2 Commercial Centre, <b>(c) Zone MUI Mixed Use.</b>  The clause provides that:  (3) Development consent must not be granted to development for the purposes of residential accommodation on land to which this clause applies unless the consent authority is satisfied the building— (a) is mixed use development, and (b) will have an active street frontage, and (c) is compatible with the desired character of the area in relation to its bulk, form, uses and scale.

## 4.2 Marrickville Development Control Plan 2011

The site is subject to the Marrickville Development Control Plan 2011 (Marrickville DCP) which provides detailed guidance regarding development matters beyond those prescribed by the Inner West LEP. Any future Development Application would have to show regard for the objectives and controls contained within the DCP, including those specifically related to Precinct 26 which relates to the Barwon Triangle, where the site is located.

Relevant objectives for Barwon Triangle are:

- To allow a **diversity of uses** including retail, commercial and residential.
- To utilise the regional **open space resource of Sydney Park** through encouraging development of residential flat buildings within the precinct and the conversion of existing light industrial buildings and warehouses to residential uses where these are worthy of retention.
- To allow and encourage a **greater scale** of development fronting the Princes Highway and at the northern end of Barwon Park Road, whilst ensuring new development is sympathetic to the low scale character of Crown Street.
- To **retain the historic value and residential character on Crown Street** by retaining a primarily lower scale residential street, and encouraging the preservation of contributory and period buildings and require their sympathetic alteration or restoration.
- To **retain the existing Victorian terraces on Campbell Street** which are a remnant of the original streetscape, and ensure that new development on this street complements the existing character defined in part by the existing residential terraces, and is complementary in both scale and modelling on larger sites at either end.
- To ensure that new development at the junction of the Princes Highway with Campbell Street includes buildings that **define the street corner**.
- To ensure that ground floor non-residential uses have **active fronts** facing onto major street frontages to contribute to a vibrant and safe streetscape.
- To ensure that higher density development demonstrates **good urban design** and environmental sustainability and provides suitable amenity for occupants of those developments, particularly where fronting the Princes Highway and Campbell Street.
- To ensure that the design of future development **protects the residential amenity** of adjoining and surrounding properties.
- To support pedestrian and cyclist access, activity and amenity including maintaining and **enhancing the public domain quality**.

## 5.0 The Reference Scheme

The proposed amendments to the Inner West LEP are supported by a reference scheme by Scott Carver (**Appendix A**). The built form and land use activities reflected in reference scheme demonstrate how a quality design outcome can be delivered at the site under the proposed LEP amendments.

### 5.1 Description of the Reference Scheme

The reference scheme is summarised as follows:

- Demolition of the existing warehouses, dwellings and site preparation works.
- Construction of a 10 storey mixed use development featuring a stepped terraced form comprising:
  - Two shared basement levels below ground containing 72 car spaces, bicycle parking and end of trip facilities. A sleeved portion of the basement is located on ground level and includes 2 vehicle parking spaces, a loading dock and associated vehicular turntable.
  - Approximately 1,150m<sup>2</sup> of non-residential land uses on the Ground Floor and Lower Level 1 including light industrial uses, commercial uses and F&B uses.
  - A total of 82 dwellings with the following dwelling mix:
    - 8 studio units
    - 27 one-bedroom units
    - 28 two-bedroom units
    - 19 three-bedroom units.
- 177m<sup>2</sup> of deep soil area (9% of the site area) and tree canopy covering a total of 290m<sup>2</sup> (15% of the site area).
- Generous areas of communal open space throughout the development including two internal communal rooms with communal terraces.
- Rooftop plant.
- A commitment to delivering 10% of all dwellings for affordable housing for a 10 year period. Dwellings will be managed by a Community Housing Provider but will remain under ownership of the owner. This is based on current scheme GFA – and will be further discussed with Council as part of the PP assessment process.



**Figure 8 – View from Crn Crown Street and Campbell Street**

Source: Scott Carver



**Figure 9 – View from Crn Pacific Highway and Campbell Street**

Source: Scott Carver



## 5.1.1 Numerical Overview

Table 4 provides a numerical overview of the reference scheme.

Table 4 – Key Information

Component	Proposal
Land Uses	Light Industry Shop top housing (ground level commercial/retail) Residential Accommodation (88m <sup>2</sup> )
Site Area	1,931m <sup>2</sup>
GFA	9,565m <sup>2</sup>
FSR	5:1
Maximum height	RL51.00 (35m including plant overrun)
Apartments	<b>82 total</b>
<ul style="list-style-type: none"> <li>• Studio units</li> <li>• One-bedroom units</li> <li>• Two-bedroom units</li> <li>• Three-bedroom units</li> </ul>	<ul style="list-style-type: none"> <li>• 8 (10%)</li> <li>• 27 (33%)</li> <li>• 28 (34%)</li> <li>• 19 (23%)</li> </ul>
Car spaces	65 spaces
Employment floor space	1,150m <sup>2</sup>
Deep soil area	177m <sup>2</sup> (9%)
Canopy Coverage	290m <sup>2</sup> (15%)
Communal Open Space	630m <sup>2</sup> (33%)
Affordable Housing	Commitment to delivering 10% of all dwellings for affordable housing for a 10 year period. Dwellings will be managed by a Community Housing Provider but will remain under ownership of the owner. This is based on current scheme GFA – and will be further discussed with Council as part of the PP assessment process.

## 5.1.2 Design principles

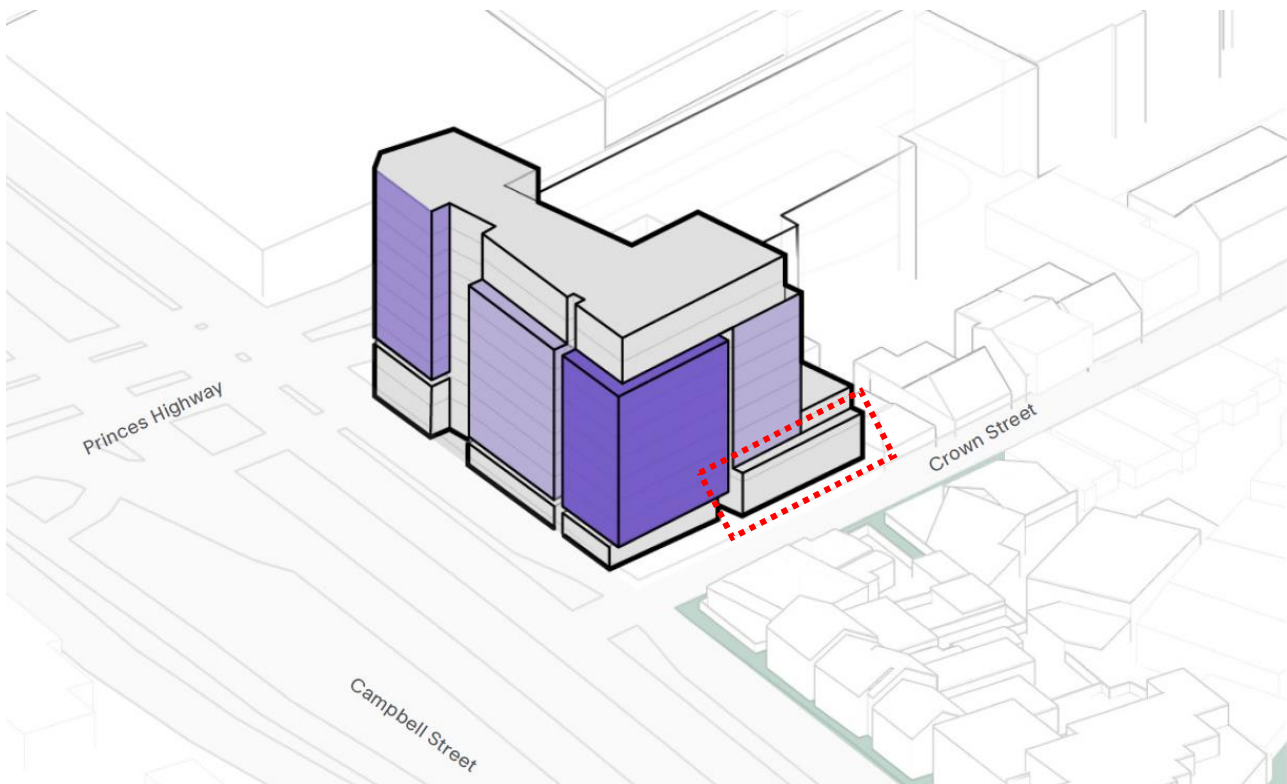
The reference scheme is conceived from the following design principles:

- **Massing:** Designed to reflect and enrich the identity of its place and its people. The development should celebrate the local history and character of St Peters while providing a community focused active contribution that brings tactility and human scale to the area.
- **Enduring:** Not designed to reflect current trends or fads, the development should strive to be enduring and relevant to its people and place for a lifetime. Materials should be durable, robust, low maintenance, and long-lasting in line with the industrial heritage of the area.
- **Vibrant and Energetic:** The development should foster the vibrant community energy providing creative spaces for its users. Spaces should be flexible and adaptable in a way that continues to be of use into the future.
- **Housing Diversity:** The development will provide well- considered affordable housing within a centrally located mixed use precinct in St Peters. The apartments will have a diverse mix that caters to a range of income groups while being highly amenable and designed for purpose.
- **A Unique Offer:** The development will comprise of apartments providing a unique offering to the community. An emphasis on shared communal spaces aims to promote social interactions and interpersonal relationships between residents.
- **Active and Inviting:** The development should maximise active frontages enabling a diverse range of offerings. The active edges should promote passive surveillance and provide inviting spaces for the people of the community to engage with.
- **High Performance and Sustainability:** The development should be shaped and optimised to maximise amenity to the internal spaces. It should respond to the new era in building performance requirements, celebrating solidity. Recycled materials, circular design principles and innovative building systems should be employed to achieve a sustainable built outcome.

### 5.1.3 Built Form

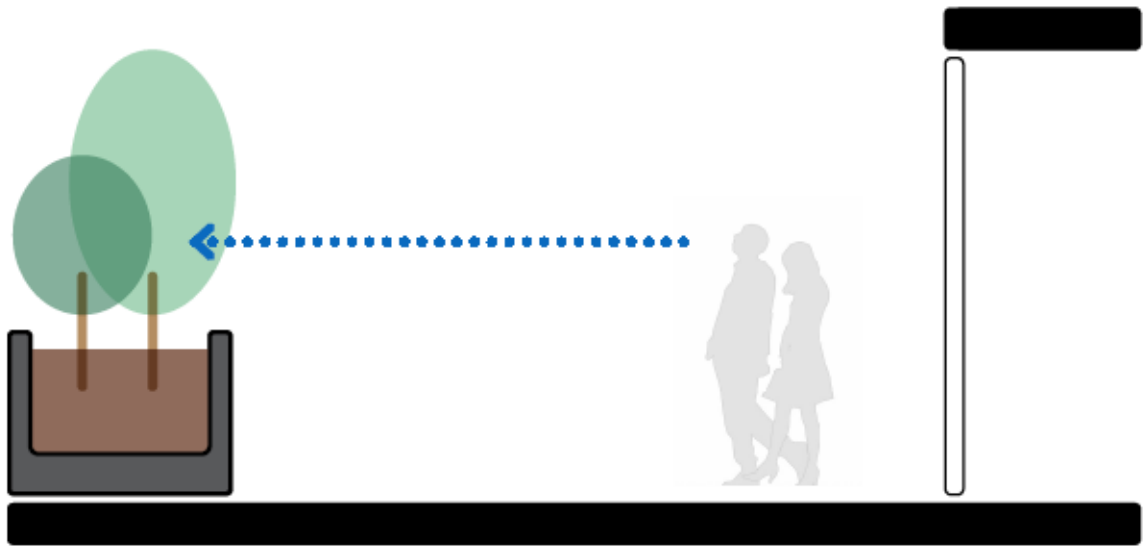
The Design Report by Scott Carver demonstrates that the built form and massing suitably responds to the opportunities and constraints presented by the site as follows:

- Responding to the **changing fabric and context** of the area. The expansion of Campbell Street provides an opportunity for the site to be developed with a landmark building, with social and economic benefits for St Peters.
- Create an **appropriate scale** adjacent to the Crown Street townhouses through a setback above the 2<sup>nd</sup> storey, as demonstrated in **Figure 10**.
- Ensure **visual privacy is maintained** through setbacks and orientating views away from adjoining residents through louvers and landscape buffers.
- Provide positive contributions towards **active frontages and economic floor space**. The reference scheme seeks to replace the current 1,000m<sup>2</sup> of employment floor space with a mixture of light industry, retail and commercial employment generating spaces totalling in at 1,150m<sup>2</sup> in area. The reference scheme provides a generous 6.2m of floor-to-floor height which creates greater flexibility in the use and opportunity to cater for large format industry/showroom uses.
- Orientating the building to maximise the number of **north-facing apartments**, thus enabling 70% of apartments to receive at least 2 hours of sunlight per day.
- Located 98% of car parking spaces underground to **maximise the ground floor non-residential uses**.
- Incorporate **winter gardens** on the southern orientated units which provide for multi-functional spaces that not only allow for natural light and ventilation, but also offers acoustic and olfactory benefits by creating a comfortable and peaceful environment for future residents to relax, work or entertain in. Sections of the winter gardens are illustrated in **Figure 12**.
- Create meaningful **height differential** to create a visual interest within the built form.
- Additional of vertical and horizontal elements to create a **hierarchy along the Cambell Street façade** and avoid a uniform or monolithic expression.



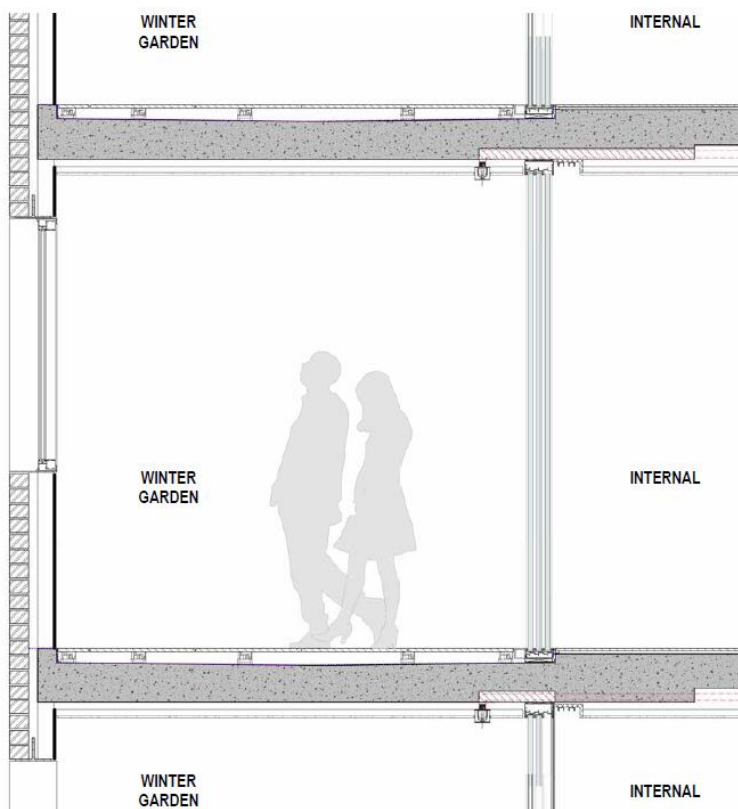
**Figure 10 – Examples of Massing (in red) which Responds to the Crown Street Context**

Source: Scott Carver



**Figure 11 – Example of Landscape Buffer to Promote Privacy and Separation**

Source: Scott Carver



**Figure 12 – Typical Section of a Wintergarden**

Source: Scott Carver

#### 5.1.4 Landscaping and open space

The reference scheme incorporates sizeable landscaped open areas and deep soil areas to contribute to the site's parkland setting and provide a high level of amenity for future residents. It delivers approximately 177sqm of deep soil area, representing 9% of the site's area and 290m<sup>2</sup> worth of canopy coverage, representing 15% of the site area. Furthermore, the reference scheme provides numerous communal open space areas within the podium that include generous planter boxes. Effectively, the deep soil zones to the south and east elevations and the podium planting on the northern elevation will contribute towards greening the site and softening the built form.

#### 5.1.5 Site access and parking

The mixed use building feature a shared two-level basement carpark with an overall capacity of 70 vehicles, with an additional two spaces located on the ground floor (72 spaces in total). The ground floor also includes an on-site loading bay capable of accommodating the Australian Standard 8.8m long Medium Rigid Vehicle (MRV). The MRV is similar in size to a typical waste collection vehicle and can enter and exit the site in a forward direction using a turn table. In the event that the turntable is not operational, the space is sufficient to allow a truck to turn around and exit. Swept paths demonstrating that a waste vehicle can enter and exit the site in a forward direction is provided on page 43 of the Urban Design Report (**Appendix A**).

#### 5.1.6 Affordable Housing

Commitment to delivering 10% of all dwellings for affordable housing for a 10 year period. Dwellings will be managed by a Community Housing Provider but will remain under ownership of the owner. This is based on current scheme GFA – and will be further discussed with Council as part of the PP assessment process.

A Letter of Offer is intended to be submitted to Council upon confirmation of in-principal support from Council on the proposed quantum of affordable housing.

Further discussion is provided in **Section 8.4**.

## 6.0 The Planning Proposal

This section sets out the Planning Proposal, including its objectives and intended outcomes and proposed LEP amendments.

### 6.1 Objectives and intended outcomes (pt 1)

The Planning Proposal intends to achieve the following outcomes:

- Retain employment floor space and create a cohesive environment by integrating sympathetic land uses.
- Provide a landmark building at this gateway location, recognising changes to the physical context of the site.
- Respond to the transformation of Campbell Road and investment in new infrastructure associated with St Peters interchange.
- Rejuvenate the public realm of the abutting streets, improve activation, and surveillance and the visual quality of the public domain.
- Facilitate the delivery of housing supply and diversity, including affordable housing, made possible through uplift which positively responds to newly delivered infrastructure.
- Sympathetically integrate the development within the low rise setting of Crown Street.
- Ensure a high degree of residential amenity is provided on site and to the adjoining land uses, considering impacts such as overshadowing, acoustic amenity and overlooking.

### 6.2 Explanations of provisions (pt 2)

The objectives and intended outcomes identified in **Section 6.1** will be achieved by amending the Inner West LEP to allow additional floor space, building height and residential accommodation at ground floor level along Crown Street as part of a mixed use development.

**Table 5** summarises the proposed planning approach for the site, while the following sections provide further details. **Appendix J** includes proposed LEP maps.

*Table 5 – Summary of Proposal*

Plan	Control	Proposal
Amend the Inner West Local Environmental Plan 2022	Maximum building height	Apply a maximum permissible building height of RL51.000 (35m)
	Maximum floor space ratio	Apply a maximum permissible floor space ratio of 5:1
	Additional local provision	Insert an Additional Local Provision allowing for residential accommodation on the ground floor of the MUI zone.

#### 6.2.1 Maximum Building Height

##### Mapping Amendment

The Planning Proposal proposes to amend the Height of Buildings Map Sheet HOB\_010 to increase the site's maximum permitted height to RL51.00.

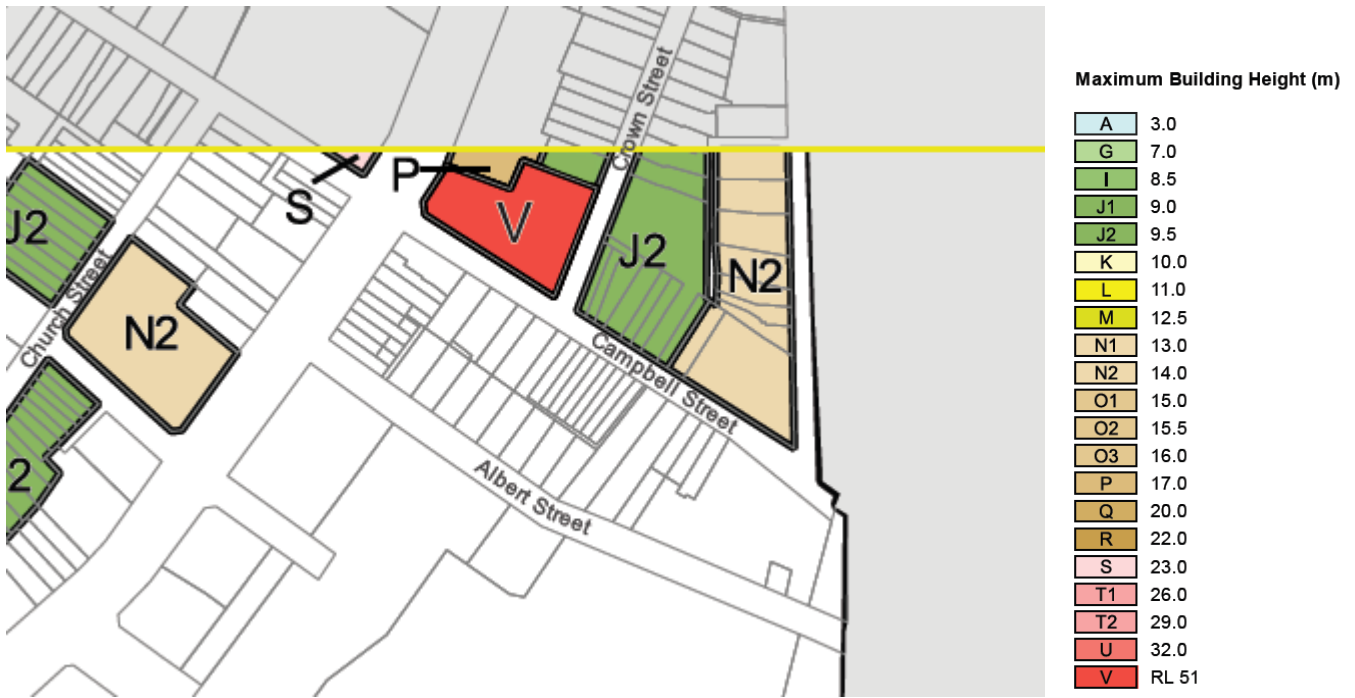


Figure 13 - Proposed LEP Height of Building Map

Source: Ethos Urban

### 6.2.2 Maximum Floor Space Ratio

The Planning Proposal proposes to amend the Floor Space Ratio Map Sheet FSR\_010 to increase the site's maximum permitted FSR to 5:1. Whilst it is noted that the reference scheme contains a GFA of 9,565 or FSR of 4.95:1, it is proposed that an FSR of 5:1 is applied to grant flexibility during the detailed design and for rounding purposes. This would result in an additional 90m<sup>2</sup> of GFA more than the reference scheme which is considered to be minimal and acceptable. During the detailed assessment, the development will need to demonstrate compliance with this control and be below the 5:1 FSR control.

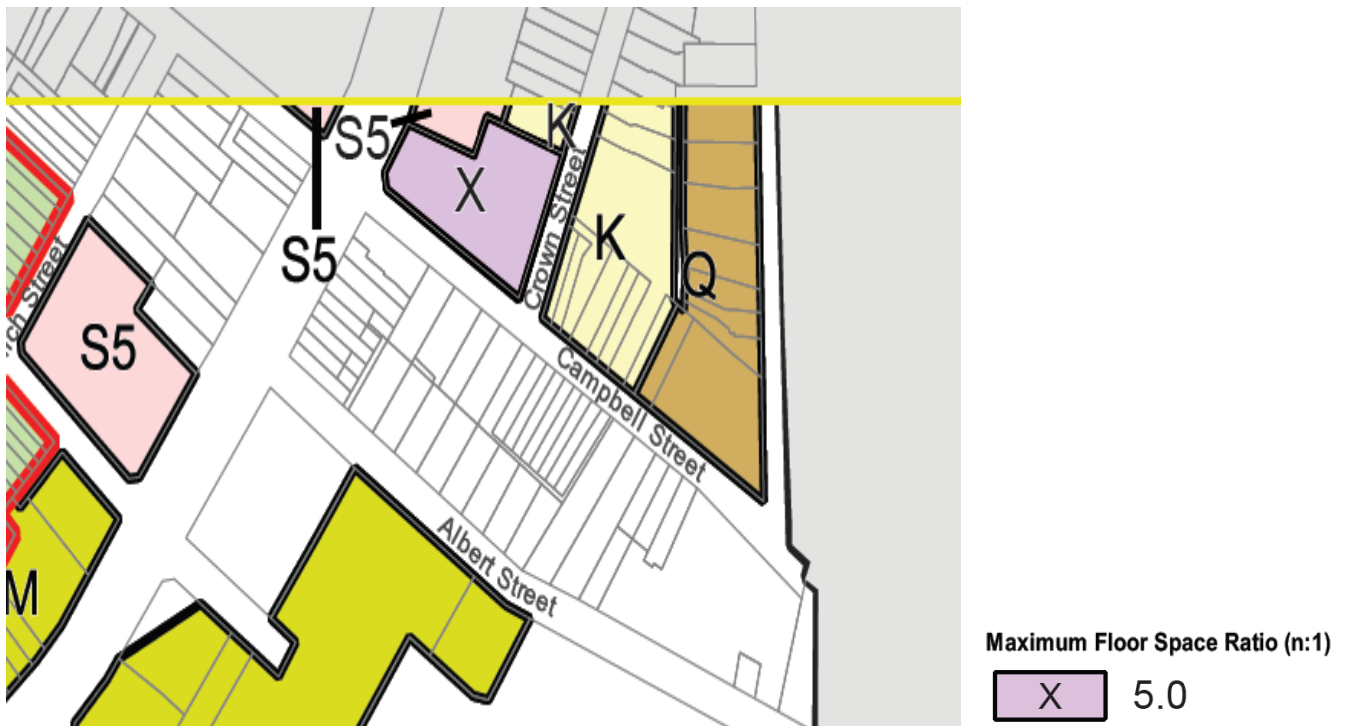


Figure 14 - Proposed LEP Floor Space Ratio Map

Source: Ethos Urban

### 6.2.3 Additional Local Provision

The site is mostly located in the MU1 Mixed Use Zone but it also straddles across the R1 General Residential Zone where it interfaces with single and two storey housing. The reference scheme responds to the built form and land use character of Crown Street by incorporating residential accommodation within a three-storey building component, including residential floor space at ground floor level.

This Planning Proposal intends to introduce an Additional Local Provision at Part 6 of the Inner West LEP to facilitate this development outcome. The Additional Local Provision has been drafted in the form of GFA maximum (only applicable to residential development on the ground floor of the MU1 zone). The maximum GFA will be set during the final stages of the Planning Proposal, and at this stage, is left indicatively in the suggested control below.

#### 6.34 Residential Accommodation as part of a mixed use development at 75-85 Crown Street and 116 Princes Street, St Peters

(1) The objective of this clause is to—

(a) provide for limited residential accommodation at ground floor level as part of mixed use development.

(2) This clause applies to land identified as “Area 19” on the Key Sites Map.

(3) Development for the purpose of residential accommodation is permitted with consent within Zone MU1 Mixed Use at ground floor level facing Crown Street.

(4) Despite subclause (3) development consent must not be granted to development for the purposes of residential accommodation on land to which this clause applies unless the consent authority is satisfied the building—

(a) is part of a mixed use development, and

(b) contains no more than 88m<sup>2</sup> residential Gross Floor Area at ground floor level, and

It is intended that as the design of the building changes through the Planning Proposal stage, the metric of residential Gross Floor Area at ground floor level is also updated to be accurate with the new design.



Figure 15 – Proposed LEP Key Sites Map

Source: Ethos Urban

### 6.3 Mapping (Pt 4)

This Planning Proposal includes amendments to the following maps:

- Height of Building Map (HOB\_010) to increase the site's maximum permitted height to RL51.00 (35m).
- Floor Space Ratio Map (FSR\_010) to increase the site's maximum permitted FSR to 5:1.
- Key Sites Map (KYS\_010) to apply the Additional Local Provision relevant to residential accommodation floorspace at ground floor level of the MUI zone.

Maps of the proposed amendments to the Inner West LEP are provided at **Appendix J**.

### 6.4 Site-specific Development Control Plan

A Site Specific Development Control Plan is provided in **Appendix M** and establishes a framework to guide development to 75-85 Crown Street and 116 Princess Highway, St Peters. It is considered that the remaining sections of the Marrickville Development Control Plan 2011, including Precinct 26 which relates to the Barwon Triangle are sufficient to guide the future development. Any future application on the site will be required to demonstrate compliance with the relevant development standards and justify any variations based on site and strategic merit.

### 6.5 Planning agreement

The details of a public benefit offer and the mechanism for its delivery (e.g. a Voluntary Planning Agreement) will be discussed with Council during future stages of the Planning Proposal process.

Specifically, a Letter of Offer prepared in accordance with Inner West's Affordable Housing Policy will be prepared and submitted upon confirmation of in-principal support for the proposed affordable housing offer.



## 7.0 Justification (Pt 3)

### 7.1 Section A – Need for a planning proposal

#### Q1 - Is the Planning Proposal a result of an endorsed local strategic planning statement, strategic study or report?

Council released the Our Place Inner West: Local Strategic Planning Statement (Inner West LSPS) in 2020. It provides a 20-year land use planning vision for the Inner West LGA informed by the Greater Cities Commissions' (GCC) Region and District Plans.

The Inner West LSPS identifies the LGA as a growing and diverse community, with the LGA's population anticipated to grow from 192,021 people in 2016 to 230,667 people in 2036 (an additional 38,646 people representing a 20.13% population growth). Accordingly, the Inner West LSPS prioritises delivering appropriately located and diverse housing sizes and options to accommodate this population growth.

Based on forecasted population growth, the Inner West LSPS identified that a total of 29,000 dwellings are required by 2036. This includes an additional 5,900 dwellings by 2021, 5,000 dwellings by 2026 and 10,000 dwellings by 2036. The LSPS finds that there is current capacity under the then planning controls to meet the 2026 targets of 10,000 dwellings. However, from 2026, there will be a reliance on the new planning controls delivered within the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) to meet the 2036 projections.

Whilst the forecasts indicate that dwelling targets will be achieved within the short term, recent statistics on dwellings completions in the LGA, provided by the Greater Sydney Urban Development Program Dashboard, show that the number of building completions (429) in the Inner West over the past 12 months is 47.2% below the previous 5 years average (see **Figure 16**). It would suggest that there is a disconnect between current planning controls and forecasted supply, with recent market conditions and limited availability of suitable development sites which has hampered dwelling supply within the LGA.


#### Latest 12 months - year to September 2022

(from available data)

Completions 

**429**


▼ 47.2% below previous 5 years' average

Approvals 

**201**

▼ 75.7% below previous 5 years' average

#### 5 year housing supply forecast (2021-2022 – 2025-2026)

Medium Growth Scenario 

**3,360**

▼ 25.6% below previous 5 years' completions

**Figure 16 – Inner West LGA Housing Supply**

Source: Greater Sydney Urban Development Program Dashboard

As presented above, there is a strategic need to plan for new opportunities to deliver additional housing supply within the Inner West. The site characteristics and location are favourable for accommodating a high density development to help address this slowdown in dwelling completions and meet Inner West identified demand for additional dwellings.

Furthermore, whilst it is acknowledged that additional dwellings are forecasted for the near future under the PRCUTS program, the real time delivery of these projects rely on incentivising land owners to redevelop sites to result in a favourable outcome, which realistically takes a lengthy process or does not happen whatsoever. In this instance, there is a landowner that is seeking to deliver additional housing supply and has demonstrated genuine intent to work with Council and pursue a pathway that will deliver additional and diverse housing.

The Our Inner West Housing Strategy 2020 originally excluded the suburb of St Peters from being identified as an area suitable for additional housing growth. The reasons for this exclusion and a response to each matter is provided below.

**Table 6 – Response to the Exclusion of St Peters within the Housing Strategy**

Reason for Exclusion	Response
[St Peters] is within flood-affected land	The Alexandra Canal Flood Study demonstrates that the site sits outside the 1% and PMF. If required, civil infrastructure can be provided to ensure the future development will include flood mitigation measures.
Considerable uncertainty about the expected level of service at the train station, considering that Metro Southwest will bypass St Peters. State agency consultation has not been able to resolve this question	St Peters Station is located on the T3 Bankstown Line and is sufficiently serviced. As described in <b>Section 3.2</b> , the site is also within 200m of a bus stops which provides access to the Sydney CBD, Mascot and the Airport.
Much of St Peters is impacted by the ANEF 25 profile where uplift of residential development is less desirable	As demonstrated in <b>Appendix C</b> and in <b>Section 8.3</b> , recommended treatment can mitigate noise impacts generated by aircraft flyover.
The locality has a high predominance of small lot sizes or strata-titling making conversion to denser forms of residential development likely unfeasible, particularly with the uncertainty regarding future mass transit arrangements	There are no complications over land ownings under this Planning Proposal.
Any areas that do exhibit more feasible areas of land are generally impacted by heritage constraints.	The site is not identified as an item of heritage significance, nor is it located within a heritage conservation area.

As demonstrated above, the site does not include site specific constraints that prevent it from being considered as a suitable location for development uplift. Therefore, the Planning Proposal, which will facilitate the development of approximately 82 dwellings, responds to the strategic need for additional housing supply on well-located sites in the Inner West. It will also support the Housing Strategy's other objectives to increase housing diversity, housing affordability and ensure the new mixed use building is of high-quality and well-designed.

## Q2 - Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The Proponent and their appointed project team considered the following options to achieve the objectives outlined in **Section 6.1**.

- Option 1 – Do nothing
- Option 2 – Lodge a Development Application (DA) that complies with the site's existing planning controls.
- Option 3 – Lodge a Development Application or State Significant Development (SSD) Application that utilises the provisions contained within the Housing SEPP.
- Option 3 – Lodge a Planning Proposal to facilitate the development of four-storey residential flat buildings (selected option).

These options are presented below.

### Do Nothing

The site is currently occupied by a range of light industrial uses and residential terraces. Under a 'do nothing' scenario, the existing development will continue to detract from the amenity of the area and Council will forfeit an opportunity to improve the site's integration and contribution to its surrounding public domain. Moreover, a 'do nothing' approach would prevent needed housing from being delivered on a strategically located site adjacent to recreational facilities and within walking distance of a train station, bus corridor and commercial and retail uses along Princes Highway. Therefore, it is evident that a do-nothing approach is wholly inconsistent with the site's strategic context.

### Compliant Development Application

As described in **Section 2**, the recent widening of Campbell Street has presented the site a unique opportunity to be recognised as a gateway corner. As noted in Council's Pre-Planning Proposal comments *"It is acknowledged the location is suitable for a signature site, as is the site on the opposite corner of Campbell Street and Princes Highway"*. A development application under the current planning controls do not recognise the current urban context of the site and would be deliver a sub-par result. A compliant DA would not promote the orderly and economic use of the land, which is a key object of the Act.

## Compliant DA/SSD Utilising Housing SEPP Provisions

The option seeks to utilise the 30% height and residential floor space bonus provided under the Housing SEPP in return for delivery of 15% of all dwellings for affordable housing. The development potential under this option does not represent the significant opportunity this site can present and is not envisioned to be the best use of the site.

## Planning Proposal to amend the Inner West LEP

The construction of a 10 storey mixed use building is the preferred development for the site for the following reasons:

- The design of the proposed concept which can be facilitated under the proposed controls are sympathetic and respectful to the surrounding urban context and housing typologies whilst recognising the potential of the site as a gateway corner.
- The construction of a mixed use building will deliver approximately 82 units to help address the forecast supply shortfall of low-rise apartments and meet the Inner West's housing targets. As noted, this need is emphasised by the Greater Sydney Urban Development Program Dashboard, which shows that the number of building completions in the Inner West over the past 12 months (429) is 47.2% below the previous 5-year average.
- The site does not contain the same constraints that apply to the rest of the St Peters and its original reason for exclusion under the Housing Strategy. As outlined in **Table 6**, the site is not constrained by way of land fragmentation, is within close proximity to public transport and can be reasonable designed to mitigate flooding and acoustic impacts.

A Planning Proposal is necessary to facilitate the development of well-designed mixed use building. Furthermore, no mechanism exists to deliver this land use under a State Environmental Planning Policy.

## 7.2 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)?

#### Greater Sydney Region Plan – A Metropolis of Three Cities

In March 2018, the released the *Greater Sydney Region Plan: A Metropolis of Three Cities* (the Regional Plan), which sets the strategic planning direction for the region. The Plan sets out key directions that collectively form a framework for liveability, productivity and sustainability that underpins the growth of Sydney.

The Region Plan outlines a number of specific 'planning objectives', with those of relevance to this Planning Proposal discussed further in **Table 7**.

**Table 7 – Consistency with the Greater Sydney Region Plan**

	Planning Objective	Consistency with Planning Proposal	
7	<b>Communities are healthy, resilient and socially connected</b>	The site benefits from good connections to public transport and multiple high-quality public parks which feature open space. The site will also be located opposite the WestConnex interchange which allows for good connectivity to anywhere within Sydney. The proposal seeks to leverage on this direct access to public open space by support additional capacity for new dwellings on the site that will allow new residents to have access to places to meet, exercise, and socially connect.	✓
10	<b>Greater housing supply</b>	Sydney is growing, and the Region Plan notes that <i>"a range of housing types provides for the needs of the community at different stages of life and caters for diverse household types. It means that as people age they can move into smaller homes and age in their own neighbourhoods, while young adults leaving home can stay close to their families and communities"</i> .  The NSW Government forecasts that an additional 725,000 homes will be needed by 2036 to meet demand based on current population projections. While detail in terms of delivery will be determined by councils preparing housing strategies under the principles established by the Plan, given Sydney's sustained population growth, the primary intent is to pursue	✓

Planning Objective	Consistency with Planning Proposal
	<p>opportunities for additional housing over the next 20 years. The Plan states that developers play an important role in supporting housing outcomes:</p> <p style="text-align: center;"><i>“The development industry needs to continually provide new housing and translate the development capacity created by the planning system into approvals and supply”.</i></p> <p>The Proposal addresses this need by unlocking additional housing supply on an underutilised site within walking distance of public transport, recreational areas, shops and services. These attributes of the site make it an ideal location to support the supply of new homes within well-serviced locations within St Peters.</p>
<p>11 <b>Housing is more diverse and affordable</b></p>	<p>Greater Sydney is one of the least affordable housing markets globally and, together with Melbourne, is the least affordable Australian city. Factors contributing to rental and purchasing affordability challenges include the limited availability of smaller dwellings to meet the growing proportion of small households and the growing distance between affordable housing areas and employment and educational opportunities.</p> <p>The Proposal envisions a mix of studios, 1, 2 and 3-bedroom apartments that generally comply with the DCP and ADG controls. This seeks to meet the diverse housing needs of the Inner West LGA by providing multiple dwelling types within the St Peters locality by supporting larger and smaller apartments to ensure apartments accommodate the needs of all household types. These homes will be near the Sydney CBD, Mascot and Sydney Airport, which are major employment hubs in Sydney, and will have immediate access to a significant public open space.</p> <p>Additionally, the Planning Proposal is committed to delivering 10% of dwellings as affordable housing for a 10 year period. This is based on current scheme GFA – and will be further discussed with Council as part of the PP assessment process.</p>
<p>13 <b>Environmental heritage is identified, conserved and enhanced</b></p>	<p>The site is not located as an item of heritage significance, nor is it located within a heritage conservation zone. Additionally, any future redevelopment will include consideration of heritage items within the area to ensure they are preserved.</p>
<p>14 <b>Integrated land use and transport creates a walkable and 30-minute city</b></p>	<p>Key elements for this objective include co-locating activities in and around centres to create walkable, cycle-friendly neighbourhoods and providing residents with a 30-minute public transport service to their nearest strategic centre seven days a week.</p> <p>The Planning Proposal seeks to give effect to this objective by delivering housing within walking distance of the bus corridor, St Peters Trains Station, recreational areas, and services. Future residents can also access nearby employment centres such Sydney Airport, Mascot and the Sydney CBD within 30 minutes by public transport.</p>
<p>31 <b>Public open space is accessible, protected and enhanced</b></p>	<p>As noted, the Proposal will is adjacent to multiple areas of public open space. The uses provides a range of passive and active recreational areas. The proposal will also improve the site’s interface with the public open space, presenting opportunities to increase passive surveillance of this public space.</p>

## Eastern City District Plan

The Region Plan is supported by the Eastern City District Plan (District Plan), which guides land use planning at the district level for the next 20 years. The Proposal strongly aligns with the District Plan's priorities and objectives as outlined in **Table 8**.

**Table 8 – Consistency with the Eastern City District Plan**

Direction	Planning Priorities/Actions	Assessment	
<b>A city supported by infrastructure</b>	Planning for a city supported by infrastructure.	The Planning Proposal facilitates new housing directly adjacent to bus routes which lead to the Sydney CBD, Mascot and the airport. The site is also within proximity to St Peters Station which is on the B3 Bankstown Line and is within 2 stops of Redfern.	✓
<b>A city for people</b>	Fostering healthy, creative, culturally rich and socially connected communities.	The Planning Proposal will foster the creation of a high-quality mixed use building, with strong access to recreation areas and pedestrian and cycling infrastructure. The site is opposite Sydney Park which will provide future residents with an exceptional public space to meet and socialise. This will assist in fostering a sense of community and supporting social cohesion as new residents move to the area.	✓
<b>Housing the city</b>	Providing housing supply, choice and affordability with access to jobs, services and public transport.	<p>The Eastern District Plan forecasts the need for an additional 29,000 homes in the Inner West LGA by 2036. In terms of housing diversity and affordability, planning for housing needs to consider the type of dwellings required to respond to expected changes in both household size and age. The District Plan states that this requires a more diversified mix of smaller homes, group homes, adaptable homes of universal design and aged care facilities.</p> <p>New housing should also be provided in the right locations and of the right design. The District Plan states that:</p> <p><i>'New housing must be in the right places to meet demand for different housing types, tenure, price points, preferred locations and design. Housing supply must be coordinated with local infrastructure to create liveable, walkable neighbourhoods with direct, safe and universally designed pedestrian and cycling connections to shops, services and public transport'.</i></p> <p>Consistent with these housing themes, the Planning Proposal:</p> <ul style="list-style-type: none"> <li>• Will provide additional housing on a site that can assist in achieving the Inner West housing target for new homes.</li> <li>• Will provide a greater diversity of housing in the form of apartments.</li> <li>• Will deliver 10% of residential floor space as affordable housing for a 10 year period.</li> <li>• Is accompanied by an Urban Design Report that is well designed and will contribute to the high amenity recreational area in which the subject site is uniquely situated.</li> </ul>	✓
<b>A city of great places</b>	Creating and renewing great places and local centres and respecting the Districts heritage.	As described above, the site is not a heritage item and is not within a Heritage Conservation Area. Planning Proposal will not have an unacceptable adverse impact on nearby heritage items.	✓
<b>A well-connected city</b>	Delivering integrated land use and transport planning and a 30-minute city.	The Planning Proposal supports the '30-minute' city vision by delivering housing within walking distance of the bus corridor, Train Station recreational areas, and services. Future residents can also access nearby	✓

Direction	Planning Priorities/Actions	Assessment
		employment centres such as Sydney Airport, Mascot and the Sydney CBD within 30 minutes by public transport.
<b>A resilient city</b>	Adapting to the impacts of urban and natural hazards and climate change.	As described throughout this report, the reference scheme has considered the following urban and natural hazards: <ul style="list-style-type: none"> <li>Noise and olfactory impacts created by the road network, WestConnex ventilators and aircraft noise through the provision of winter gardens and other mitigation measures.</li> <li>Privacy impacts over neighbouring development through the provision of angled louvers and planter boxes.</li> </ul>

#### 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?

##### Our Place Inner West: Local Strategic Planning Statement

As noted, the Inner West LSPS identifies the LGA as being a diverse community, with the LGA's population anticipated to grow from 192,021 people in 2016 to 230,667 people in 2036 (an additional 38,646 people representing a 20.13% population growth). Accordingly, the Inner West LSPS prioritises delivering appropriately located and diverse housing sizes and options to accommodate this population growth. Accordingly, the LSPS prioritises the delivery of appropriately located, diverse and affordable housing sizes and options to accommodate population growth.

Furthermore, the LSPS identifies the importance of retaining employment lands. As identified above, the proposed development will replace the existing 1,000m<sup>2</sup> of employment floor space, with over 1,150m<sup>2</sup> of employment floor space, split between light industry, retail and commercial uses.

**Table 9** sets out how the Planning Proposal is consistent and gives effect to the planning priorities identified by the LSPS.

**Table 9 – Consistency with the Local Strategic Planning Statement**

Planning Priority	Consistency with the Planning Proposal
<b>6 Plan for high quality, accessible and sustainable housing growth in appropriate locations integrated with infrastructure provision and with respect for place, local character and heritage significance</b>	The site is in a highly accessible location, being close to numerous bus and rail routes. The dwelling proposed provides a range of housing typologies and sizes to cater for the needs of people at all stages in their life, including affordable housing. As demonstrated in <b>Appendix A</b> , the reference scheme has been designed to respond to acoustic, overlooking and olfactory matters and is well suited for its place. The retention of the two-storey terrace on Crown Street demonstrate respect to the local character of the place.
<b>7 Provide for a rich diversity of functional, safe and enjoyable urban spaces connected with and enhanced by their surroundings</b>	The Planning Proposal will encourage the development of an underutilised site with a well reference scheme. The new and modern design of the future building will create enjoyable spaces that connect with their surroundings. The reference scheme also includes a café and will extend support the extension of active uses from Sydney Park to the site.
<b>9 A thriving local economy</b>	The Planning Proposal and reference scheme seeks to replace the existing 1,000m <sup>2</sup> of employment floor space, with over 1,150m <sup>2</sup> of employment floor space. The Planning Proposal will support the local economy and provide for additional employment opportunities.

## Inner West Housing Strategy

The Inner West Housing Strategy plans for the growth of approximately 20,900 new dwellings in the LGA by 2036. The Housing Strategy is centred on 7 priorities and principles, 6 of which are relevant to the Proposal:

**Principle 2: Accommodate housing growth through a range of sensitive infill compatible with heritage values and local character – enabling areas to evolve with respect over time.**

The site is not identified as an item of heritage significance, nor is it located in a heritage conservation area, and is not constrained from a heritage perspective. The Planning Proposal will support the retention of the two storey built form on Crown Street that is sympathetic to the local character.

**Principle 3: Provide for a diverse mix of housing typologies, sizes and tenures that cater to the needs of people at all stages of their lives**

As demonstrated by the reference scheme, the site is capable of accommodating 82 dwellings that will include a range of sizes and typologies. The Planning Proposal is also committed to delivering 10% of all dwellings for affordable housings.

**Principle 4: Start to close the affordability gap between housing need and provision for very low, low and moderate income households.**

As stated above, based on proposed scheme GFA – the Planning Proposal is committed to delivering 10% of all dwellings for affordable housing. This will be further discussed with Council as part of the PP assessment process. This will positively benefits households at a range of income thresholds.

**Principle 5: Locate the majority of new housing opportunities in areas that are within a 10-minute walk of centres, transport and services, supporting their vibrancy and aligning with infrastructure provision and growth.**

The site is located approximately 200m from bus stops which are connected to Mascot, the airport and with direct routes to the Sydney CBD. The site is also within walking distance to St Peters Station and 1,500m to Sydenham Metro Station.

**Principle 6: Design quality housing and surrounding public spaces to maximise amenity, safety and security for residents and provide a positive contribution to its neighbourhood.**

The Planning Proposal seeks to provide new controls to a site to allow for a development that achieves good solar and noise amenity. The introduction of residential components on Campbell Street and the Princess Highway will allow for casual surveillance and will improve the safety and security of the area. The future development is envisioned to be of high architectural and design standards and will positively contribute towards the character of the neighbourhood.

**Principle 7: Homes are designed to be ecologically sustainable, supporting Council's aim of zero net carbon emissions by 2050, water sensitivity, increasing biodiversity and zero waste.**

The Sustainability Planning Report in **Appendix F** identifies that the future development is capable of achieving key sustainability initiatives including:

- At least 15% canopy coverage across the site within 10 years of the completion of the development to enhance amenity and mitigate urban heat.
- Provision of vegetation, green roofs and materials with a high solar reflectance index, with particular focus on western and northern building facades.
- Recycling and Waste Management Plan in accordance with the Marrickville DCP 2011 Section 2.21 – Site Facilities and Waste Management.
- Compliance with the requirements of *Housing SEPP* and the related *Apartment Design Guide*.

## Inner West Employment and Retail Lands Strategy

The Employment and Retail Lands Strategy seeks to effectively manage the supply of land for employment and commercial uses that will benefit businesses, residents and the local economy of the LGA. The Employment and Retail Lands Strategy is underpinned by 4 principles, of which 3 are relevant for this proposal.

### **2. Industry and urban services lands are protected and managed**

The Planning Proposal seeks to protect the employment services on the site and deliver an additional 150m<sup>2</sup> of employment floorspace. The new split of employment floorspace to include commercial and light industrial supports the versatility of these spaces and provides further diversity for the employment market.

### 3. Spaces and businesses are suitable and available

The Planning Proposal seeks to support and reinforce the importance of industrial land through its retention. The Concept Scheme seeks to retain the light industry use and provide a new space that is able to accommodate a wide range of light industry businesses.

### 4. The Planning framework is clear

The proposed change to the local planning controls provides a framework which will give clarity for businesses on where to locate and invest in.

## Q5 - Is the planning proposal consistent with any other applicable State and regional studies or strategies?

### Future Transport Strategy

The Future Transport Strategy is a 40-year strategy to achieve the NSW Government's vision for the city's transport system. The Planning Proposal is consistent with the Strategy by:

- Integrating land use and transport by increasing density within proximity to mass transit options along Botany Road.
- Improving liveability by providing housing close to high quality, reliable new public transport investments.
- Improving sustainability by locating housing close to public and active transport routes, which will reduce reliance on private motor vehicles and encourages active transport.

## Q6 - Is the planning proposal consistent with any other applicable State and regional studies or strategies?

An assessment of the Planning Proposal against relevant State Environmental Planning Policies (SEPPs) is set out in **Table 10** below.

**Table 10 - Consistency with applicable SEPPs**

SEPP	Consistency			Comment
	Yes	No	N/A	
SEPP (Planning Systems)			✓	The future development of the site may be deemed as 'regional development', should the development's EDC exceed \$30 million.
SEPP (Exempt and Complying Development Codes)			✓	Not relevant to proposed amendment. May apply to future development on the site.
SEPP (Resilience and Hazards) 2021	✓			SEPP (Resilience and Hazards) 2021 aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. It specifically requires consideration when rezoning land and in determining development applications and requires that remediation work meets certain standards and notification requirements.  A Preliminary Site Investigation is provided in <b>Appendix D</b> and finds that the site can be made suitable, subject to a Detailed Site Investigation which will be provided at the development application stage.
SEPP (Industry and Employment) 2021			✓	No signage is proposed. Consideration for signage will occur at the development application stage.
SEPP (Transport and Infrastructure) 2021	✓			Future development applications may be classified as traffic-generating development and require referral to TfNSW. Confirmation will be provided at the development application stage.
SEPP (Housing) 2021	✓			The reference scheme prepared by Scott Carver ( <b>Appendix A</b> ) demonstrates general compliance with the relevant provisions of the ADG. Future development applications to



SEPP	Consistency			Comment
				which the Housing SEPP applies will be accompanied by a detailed ADG assessment. This include provisions relating to affordable housing. The development is still applicable to such controls should the future Development Application include more affordable housing than what is offered under this Planning Proposal. However, given the constraints of the site (being the OLS restriction), the site is unlikely to be able to access these bonuses as part of any future Development Application.
SEPP (Sustainable Buildings) 2022	✓			The Planning Proposal will not preclude future compliance with SEPP (Sustainable Buildings) 2022.
State Environmental Planning Policy (Biodiversity and Conservation) 2021			✓	The development scheme presented in <b>Section 4</b> does not involve the removal of any trees. Therefore, it is unlikely that the State Environmental Planning Policy (Biodiversity and Conservation) 2021 will apply. Nevertheless, the Proponent will seek consent for clearing vegetation should it be required at the DA stage.

## Q7 - Is the planning proposal consistent with applicable Ministerial Directions (section 9.1 Directions)?

**Table 11 - Consistency of the Planning Proposal with the relevant Section 9.1 Directions**

Ministerial Direction	Consistency			Comment
	Yes	No	N/A	
<b>1. Planning Systems</b>				
1.1 Implementation of Regional plans	✓			As demonstrated in <b>Section 6.2</b> , the Planning Proposal is consistent with the Greater Sydney Regional Plan.
1.2 Development of Aboriginal Land Council Land			✓	Not applicable
1.3 Approval and Referral Requirements	✓			The Planning Proposal is not designated development, and it would not require the concurrence of the DPE.
1.4 Site Specific Provisions	✓			Site specific provisions are proposed.
<b>1. Planning Systems Place-based</b>				
1.5 Parramatta Road Corridor Urban Transformation Strategy			✓	Not applicable
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan			✓	Not applicable
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	Not applicable
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	Not applicable
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor			✓	Not applicable
1.10 Implementation of Western Sydney Aerotropolis Interim Land Use and Infrastructure Implementation Plan			✓	Not applicable
1.11 Implementation of Bayside West Precincts 2036 Plan			✓	Not applicable.

Ministerial Direction	Consistency			Comment
1.12 Implementation of Planning Principles for the Cooks Cove Precinct			✓	Not applicable
1.13 Implementation of St Leonards and Crows Nest 2036 Plan			✓	Not applicable
1.14 Implementation of Greater Macarthur 2040			✓	Not applicable
1.15 Implementation of the Pymont Peninsula Place Strategy			✓	Not applicable
1.16 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	Not applicable
1.17 Implementation of the Bays West Place Strategy			✓	Not applicable
1.18 Implementation of the Macquarie Park Innovation Precinct			✓	Not applicable
1.19 Implementation of the Westmead Place Strategy			✓	Not applicable
1.20 Implementation of the Camellia-Rosehill Place Strategy			✓	Not applicable
1.21 Implementation of South West Growth Area Structure Plan			✓	Not applicable
1.22 Implementation of the Cherrybrook Station Place Strategy			✓	Not applicable
<b>3. Biodiversity and Conservation</b>				
3.1 Conservation Zone			✓	Not applicable
3.2 Heritage Conservation	✓			The site is not a heritage item, nor is it within a heritage conservation area. The proposed development will not impact on the conservation of heritage items.
3.3 Sydney Drinking Water Catchments			✓	Not applicable
3.4 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs			✓	Not applicable
3.5 Recreation Vehicle Areas			✓	Not applicable
3.6 Strategic Conservation Planning			✓	Not applicable
3.7 Public Bushland			✓	Not applicable
3.8 Willandra Lakes Region			✓	Not applicable
3.9 Sydney Harbour Foreshores and Waterways Area			✓	Not applicable
3.10 Water Catchment Protection			✓	Not applicable
<b>4. Resilience and Hazards</b>				
4.1 Flooding	✓			The Alexandra Canal Flood Study demonstrates that the site sits outside the 1% and PMF. If required, civil infrastructure can be provided to ensure the future development will include flood mitigation measures.
4.2 Coastal Management			✓	Not applicable
4.3 Planning for Bushfire Protection			✓	Not applicable

Ministerial Direction	Consistency			Comment
4.4 Remediation of contaminated land	✓			A Preliminary Site Investigation is provided in <b>Appendix D</b> and finds that the site can be made suitable, subject to a Detailed Site Investigation which will be provided at the development application stage.
4.5 Acid Sulfate Soils	✓			It is recognised that it is the role of the consent authority to consider the relevant acid sulfate soil study. There will be no change of use or zone under this Planning Proposal.
4.6 Mine Subsidence and Unstable Land			✓	Not applicable
<b>5. Transport and Infrastructure</b>				
5.1 Integrating Land Use and Transport	✓			The site will facilitate a residential land use that better utilises its proximity to public transport infrastructure at than the site's existing land uses.
5.2 Reserving Land for Public Purposes	✓			The Planning Proposal will not use land subject to reservations for a public purpose. As discussed above, land subject to the reservation has been acquired by TfNSW and no longer serves any purpose.
5.3 Development Near Regulated Airports and Defence Airfields	✓			Engagement with respect to the subject Planning Proposal can be undertaken during its assessment with the relevant airspace authorities as required. It is recognised that the Concept Scheme and proposed height control does not impede into the OLS for the site
5.4 Shooting Ranges			✓	Not applicable
<b>6. Housing</b>				
6.1 Residential zones	✓			The Planning Proposal will meet the objectives of this direction by: <ul style="list-style-type: none"> <li>Increasing the supply of diverse housing options in St Peters.</li> <li>Making more efficient use of the site's proximity to public transport, recreational areas, and services.</li> <li>Utilising existing urban land rather than land on the urban fringe.</li> </ul>
6.2 Caravan Parks and Manufactured Home Estates			✓	Not applicable
<b>7. Industry and Employment</b>				
7.1 Business and Industrial Zone	✓			The Planning Proposal supports the retention of existing business and industrial uses on the site. These uses will continue to be permissible in the future development application.
7.2 Reduction in non-hosted short term rental accommodation period			✓	Not applicable
7.3 Commercial and Retail Development along the Pacific Highway North Coast			✓	Not applicable
<b>8. Resources and Energy</b>				
8.1 Mining, Petroleum Production and Extractive Industries			✓	Not applicable
<b>9. Primary Production</b>				
9.1 Rural Zones			✓	Not applicable
9.2 Rural Lands			✓	Not applicable
9.3 Oyster Aquaculture			✓	Not applicable

Ministerial Direction	Consistency			Comment
9.4 Farmland of State and Regional Significance on the NSW Far North Coast			✓	Not applicable

### 7.3 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.** Although the site is located within the setting of Sydney Park, it is also within a highly modified urban environment. Therefore, it does not contain critical habitat or threatened species, populations or ecological communities, or their habitats.

Therefore, the Planning Proposal is unlikely to impact critical habitat or threatened species, populations or ecological communities or their habitats. If relevant, these matters can be appropriately considered at the development application stage.

#### Q9 - Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

**Negligible Impacts.** As discussed in the **Section 7**, the proposal is not expected to result in any significant adverse environmental effects. Notably:

- The proposed massing strategy is appropriate for the site considering its strategic context, changing urban context and the existing local character.
- The Planning Proposal and associated concept scheme appropriately addresses all reasons as to why St Peters was excluded from uplift and rezoning, as per the Housing Strategy.
- The Proposal will enhance the setting of the adjacent Sydney Park by replacing unsightly and incompatible industrial units with a more appropriate and sympathetic land use that can contribute to greater passive surveillance and visual expansion of the Park through balcony locations, active uses on the ground floor and communal open space.
- The site is positioned south of other residential accommodation to avoid overshadowing existing residential properties. Additionally, overlooking to adjacent residential properties have been heavily considered and can be mitigated through design measures.

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

**Yes.** The social and economic impacts arising from the Planning Proposal are identified in **Section 7.10** of this report. The social and economic impacts will be positive. They include:

- Providing a catalyst for economic growth at a time of economic uncertainty, through stimulating investment and construction activity.
- Supporting additional housing supply, improving resident choice, and supporting population growth within a mixed use precinct, close to public transport, employment opportunities as well as social and community infrastructure.
- Increasing housing diversity and choice through approximately 82 apartments, which will support the delivery of new housing opportunities and price points within proximity to transport infrastructure and services.
- New residents will support higher levels of activity and patronage within the Inner West LGA.

### 7.4 Section D – Infrastructure (Local, State and Commonwealth)

#### Q11 - Is there adequate public infrastructure for the Planning Proposal?

**Yes.** The site is located in an established urban area and has access to public transport, infrastructure and health and education services. Further investigations will be undertaken as part of the preparation of the development application to determine whether any upgrade of existing utilities is required to enable the proposal.

## 7.5 Section E – State and Commonwealth interests

### Q12 - What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?

The views of State and Commonwealth public authorities will be further known and reinforced once further consultation has occurred in accordance with the Gateway determination of the Planning Proposal.

## 7.6 Summary of strategic and site-specific merit

The *Local Environmental Plan Making Guideline* sets out that a Planning Proposal needs to demonstrate that it meets the Strategic Merit Test. The consistency of this Planning Proposal with the assessment criteria is set out below.

### a) Does the proposal have strategic merit?

Part 3 of the *Local Environmental Plan Making Guideline* establishes assessment criteria for determining if Planning Proposals have strategic merit:

- a) *Does the proposal have strategic merit? Is it:*
- *Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the Site, including any draft regional, district or corridor/precinct plans released for public comment; or*
  - *Consistent with a relevant local council strategy that has been endorsed by the Department; or*
  - *Responding to a change in circumstances, such as the investment in new infrastructure or changing demographics trends that have not been recognised by existing planning controls.*

As outlined in the preceding sections, the Planning Proposal is consistent with the Region Plan, District Plan, LSPS, Housing Strategy and Employment and Retail Land Strategy.

### b) Does the proposal have site-specific merit?

Part 3 of the *Local Environmental Plan Making Guideline* establishes assessment criteria for determining if Planning Proposals have site-specific merit:

- b) *Does the proposal have site-specific merit, having regard to the following?*
- *the natural environment (including known significant environmental values, resources, or hazards); and*
  - *the existing uses, approved uses, and likely future uses or land in the vicinity of the proposal; and*
  - *the 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.*

As outlined in the preceding sections of this report, the Planning Proposal has site-specific merit for the following reasons:

- The site is currently underutilised and presents poorly to the public realm. Recent changes in the urban fabric lend the site to a scale of density that its not currently contemplated by the existing planning controls.
- The site is within walking distance to public transport, employment opportunities and services.
- The physical characteristics of the site allow for a mixed-use building that protects employment floorspace and delivers higher density housing without causing unreasonable amenity impacts to neighbouring properties.
- The site can be readily serviced by utilities and infrastructure to support the proposed use and density.

## Summary

This Planning Proposal achieves both the strategic merit and site-specific merit criteria, and therefore the Planning Proposal should be supported.

## 8.0 Environmental assessment

This section provides an environmental assessment of the proposed planning controls and the indicative development those controls are capable of accommodating.

### 8.1 Land use

The site is zoned part MU1 Mixed Use and part R1 General Residential under the Inner West LEP. The Planning Proposal's consistency with these zones are discussed below.

**Table 12 – Consistency with the MU1 and R1 Zoning Objectives**

Objectives	Comment
<b>MU1 Mixed Use</b>	
To encourage a diversity of business, retail, office and light industrial land uses that generate employment opportunities.	Any future development will have the opportunity to provide a diversity of business and industrial uses on the site for employment generation. As shown in <b>Appendix A</b> , the reference scheme provides an additional 150m <sup>2</sup> of employment floorspace than the existing site.
To ensure that new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.	Shoptop housing and other uses remain permissible on site with consent which will provide for diverse and active frontages that will contribute towards the streetscape and activation of the public space.
To minimise conflict between land uses within this zone and land uses within adjoining zones.	The future development, similar to the reference scheme, is capable to blending multiple land uses without creating conflicts such as overlooking and traffic generation.
To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.	Business and industrial uses remain permissible with consent on the site. The renewal of the site will provide for a greater mix of employment floorspace which will encourage owners to utilise these spaces.
To enable land uses that do not impact on the role or viability of nearby centres.	The increase of 150m <sup>2</sup> of employment floorspace will not impact on the role or viability of nearby centres.
To enhance the visual appearance and accessibility of the area by ensuring development achieves high architectural, urban design and landscape standards that caters for the needs of all ages and abilities.	The Planning Proposal will facilitate the future redevelopment of the site which will be of high architectural and urban design and can achieve appropriate landscaping.
<b>R1 General Residential</b>	
To provide for the housing needs of the community.	The Planning Proposal will retain residential uses on the site such as shop-top housing. As demonstrated in <b>Appendix A</b> , the reference scheme has the capacity to provide approximately 82 dwellings.
To provide for a variety of housing types and densities.	The reference scheme provides for a mix of dwelling sizes and mix generally aligned with the DCP controls, and will also provide affordable housing on site.
To enable other land uses that provide facilities or services to meet the day to day needs of residents.	The future development has the capacity to provide other land uses (such as commercial and industrial uses) that will services the every-day needs of residents.
To provide residential development that maintains the character of built and natural features in the surrounding area.	Matters regarding design and consistency with character will be assessed in the future development application. Notwithstanding the above, as demonstrated in the reference scheme, the development is capable of being consistent with the character of the surrounding build and natural development. Particularly, the reference scheme includes a 2 storey podium on Crown Street that replicates the Crown Street terraces and urban fabric.

As demonstrated above, the existing zoning of the site is appropriate for this Planning Proposal and the future development.

## 8.2 Built Form and Massing

### 8.2.1 Height

The Planning Proposal seeks to implement a maximum building height of RL51.00 (35m) on the site. Since the widening of Campbell Street into a 6-lane road, the site is located on a gateway corner and the design of the future development needs to represent this status and take up the future development potential. The Design Report by Scott Carver (**Appendix A**) has heavily considered uplift potential based on a 23m scenario, 35m scenario and 55m scenario. The opportunity for uplift through the amalgamation of the individual lots and the changing fabric of the surrounding context, the existing commercial and industrial offerings and the opportunity to add additional uses such as food and beverage / retail, it was considered that the additional height would support the diversity that the future development could offer and in turn, the new offerings provided an opportunity for a diverse range of housing including an affordable housing component.

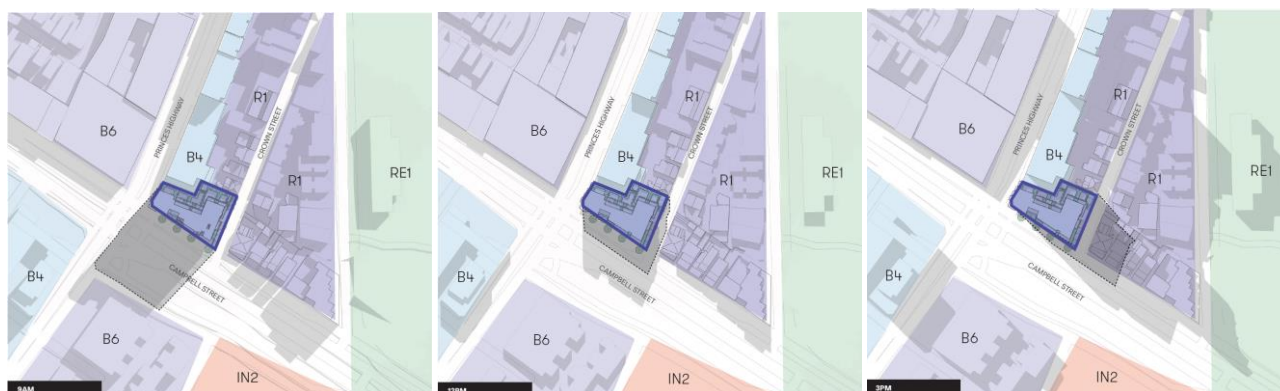
Each scenario was measured against the previous benefits and site factors explored, and given a rating to determine what would be a suitable uplift. As shown in **Table 13**, the RL51.00 (35m) scenario is the optimum outcome for the site.

**Table 13 – Comparison of 23m, 35, and 55m Height Scenario**

	23m scenario	35m scenario	55m scenario
Social and economic uplift	X Unsatisfied	✓ Satisfied	✓ Satisfied
Respond to the surrounding urban fabric	✓ Satisfied	✓ Satisfied	○ Partially satisfied
Anchoring the site as a gateway	○ Partially satisfied	✓ Satisfied	✓ Satisfied
Minimal impact to surrounding dwellings (overshadowing)	✓ Satisfied	✓ Satisfied	X Unsatisfied
Does not impact on flight path	✓ Satisfied	✓ Satisfied	X Unsatisfied

### 8.2.2 Overshadowing

A shadow diagram comparison between the existing built form and the reference scheme is provided in **Appendix A** and replicated below. Overall there will be no significant impacts created by the proposed RL51.00 (35m) height control. Between 9am-12pm on June 21<sup>st</sup>, shadows are predominantly contained within the Campbell Street road reserve. From 12pm onwards, afternoon shadows will partially impact on adjoining uses to the east. However, as shown **Figure 17** through strategically placing the bulk of the reference scheme to the south of the site, the additional overshadowing is contained to the build form and the side setbacks of the neighbouring buildings. The primary open space towards the rear of the easterly dwellings will remain to receive more than 3 hours of solar access between 9am-3pm.

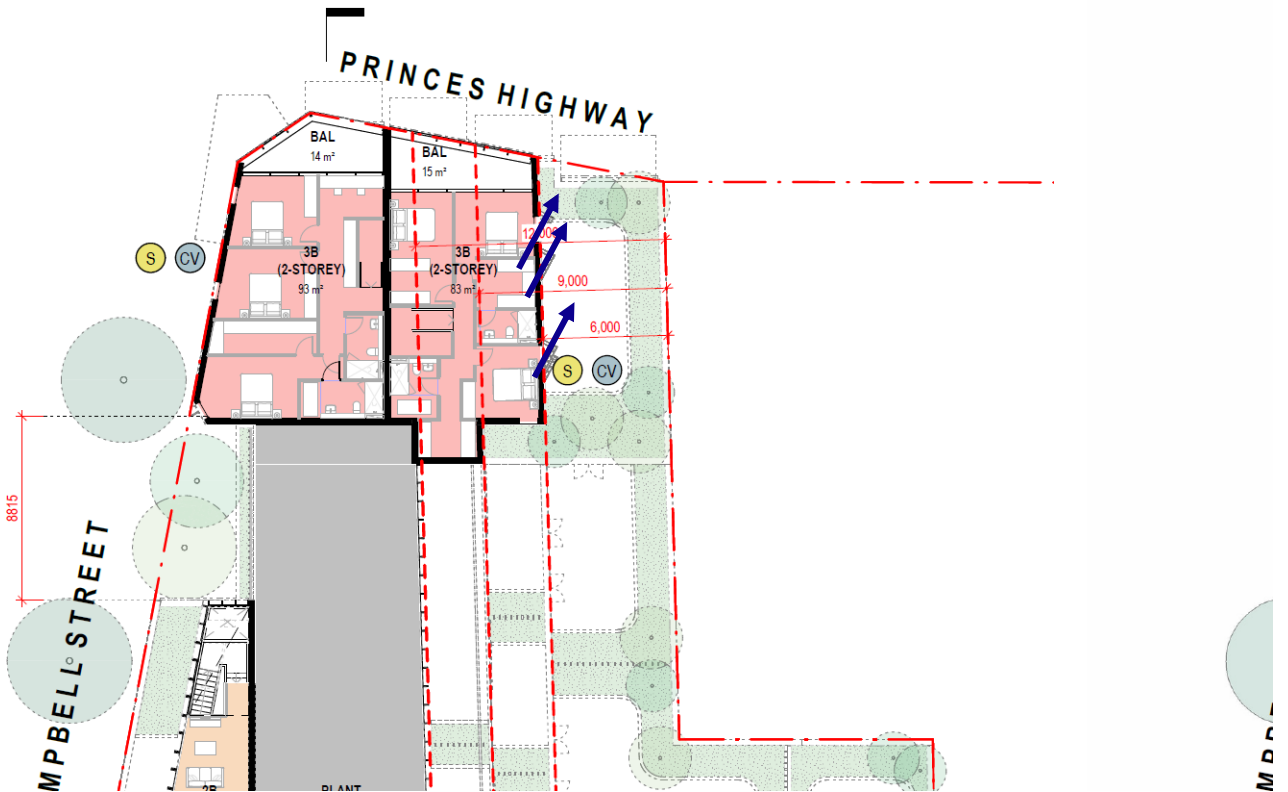


**Figure 17 – Overshadowing Diagrams on Winter Solstice**

Source: Scott Carver

### 8.2.3 Privacy and Overlooking

Overlooking concerns and privacy towards the lower scale residential to the north are able to be managed through design measures. This includes setbacks compliant with ADG setbacks. Minor portions of the upper levels protrude into this setback but include louvers which direct views towards the public domain, rather than only neighbouring land. This is demonstrated in **Figure 18**. Nevertheless, these openings are not formally required and act as ‘secondary’ openings. If required, these can be removed and a blank wall treatment can be implemented. If a blank wall treatment is incorporated, then a 9m setback control applies and these units will comply with the relevant setback control. However, these secondary openings provide additional amenity and are supported as they remain to incorporate design measures which achieve adequate privacy measures and have been incorporated into the reference scheme.



**Figure 18 – Demonstration of Design Measures to Mitigate Overlooking**

Source: Scott Carver, Ethos Urban

### 8.3 Residential Amenity

The Planning Proposal will allow for the future development of the site which will provide a high degree of residential amenity. The reference scheme provided in **Appendix A** is generally ADG compliant and has been designed to respond to the surrounding environment. Specifically, the reference scheme complies with the natural ventilation requirements as 65% of all apartments achieve cross ventilation. Additionally, 70% of apartments received optimised daylight access to primary living spaces.

With regards to acoustic amenity PWNA in **Appendix C** confirms that the future development will provide for sound acoustic levels, subject to the following recommendations:

- The future development will need to provide rooms that adhere to the following recommended Aircraft Noise Reductions (ARNs):
  - Sleeping areas, dedicated loungers: 29 dB
  - Habitable spaces including kitchen areas, offices: 24 dB
  - Bathrooms, toilets, laundries: 19 dB
- Glazing are to comply with Section 3.3.1 of that report.



- If external walls are constructed from concrete or masonry materials, no further mitigation measures are required. If external walls include penetrations, all gaps are to be filled with an acoustic grade sealant which provides equal or better performances to the system being penetrated.
- Any light-weight external plasterboard walls should be constructed from a construction with a minimum acoustic performance of Rw 50
- If light weight roof constructions are proposed, install acoustic insulation within the external roof/ceiling cavity similar to a 75 mm thick 14 kg/m<sup>3</sup> insulation. No mitigation measures are required for a concrete roof.

Accordingly, the Planning Proposal is supported from an acoustic perspective, subject to a series of design measures that will be addressed at the Development Application stage.

Furthermore, an Air Quality Impact Assessment has been prepared by EMM to understand the impacts of the surrounding environment on air quality. It is understood that potential air quality impacts can be framed in terms of the following:

- **Construction Impacts** – The impacts of the construction of WestConnex such as dust will be managed by best practice methods and will be temporary. Additionally, due to the estimated timing, it is not expected that the construction of the future development will occur during the construction of the adjacent WestConnex project. For those reasons, EMM have not addressed construction impacts.
- **Operational Impacts** – Ongoing operational impacts have been identified by EMM to include the impacts of emissions from tunnel ventilation outlets and use of the surface roads. Whilst these impacts have been considered in the assessment of the M4-M5 Link, EMM considered it worth re-assessing the impacts as the EIS modelling to not account for the proposed Planning Proposal on the site. Accordingly, the Air Quality Impact Assessment determines whether the proposed uplift would result in higher concentrations of air pollution that at ground level.

An assessment was undertaken by EMM involving the use of an atmospheric dispersion model to estimate the impacts of emissions from road traffic on air quality at the development. The model predictions were combined with measurements of background air quality to determine the total pollutant concentrations (also referred to as 'cumulative impacts') at the development.

The methodology was broadly in accordance with the Approved Methods (NSW EPA 2022), noting that this document is designed primarily for the assessment of industrial facilities. Consideration was also given to the CASANZ4 Good Practice Guide for the Assessment and Management of Air Pollution from Road Transport Projects (CASANZ 2022).

Ultimately, the assessment found that each pollutant resulting from the operation of tunnel ventilation outlets and surface roads (such as NO<sub>x</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>), was highest at the ground level and generally decreased with height. The lowest concentrations were usually predicated from the highest levels of the building. This reflects the diminishing contributions from surface roads near the development with height.

With regards to the ventilation outlets, it is noted that the contribution of the sources was not the main contributor towards air quality impacts. Concentration from sources were highest at the ground level and as such the uplift proposed to the site will not be detrimentally impacted by the ventilation outlets.

## 8.4 Affordable Housing

Council adopted its Affordable Housing Policy on 10 May 2022 which sets a target for 15% of **new** residential floor space to be dedicated to very low, low and moderate income households.

The site currently includes approximately 200m<sup>2</sup> of residential GFA. The proposed reference scheme includes approximately 8,000m<sup>2</sup> of residential GFA. This Planning Proposal includes an offer to 10% of dwellings for 10 years as affordable housing which is approximately 780m<sup>2</sup>. This equates to 10% under the Inner West Council's Affordable Housing Policy (IWC AHP).

It is noted that the owner will retain ownership of affordable housing units and have them managed by a registered Community Housing Provider.

There are feasibility limitations which prevent the delivery of 15% of new residential floor space as affordable housing. With consideration to current market conditions and the rapid increase to construction costs has diminished the viability of residential projects across Greater Sydney.

Given these limitations, the proposed 10% of the affordable housing for a minimum of 10 years is the optimal outcome which balances the need for affordable housing with consideration of market conditions. This position overcomes any uncertainty from market forces and places the development in a better position in coming to fruition.

The impact of feasibility on the delivery of affordable housing has also affected the planning outcomes of recently adopted rezoning proposals, as seen with the Tier 1 TOD Accelerated Precincts, with affordable housing requirements ranging between 3-5% in Homebush Precinct and 3-4% in Bankstown Precinct.

Based on the above considerations, the proposed allocation of 10% of residential floor space for affordable housing for 10 years is seen to be an acceptable proposition to contribute to affordable housing supply in the LGA.

**Figure 19 - Affordable Housing Offer Analysis**

Existing GFA	
Existing Residential GFA	Approximately 200m <sup>2</sup>
Proposed Scheme	
Total proposed GFA	9,565m <sup>2</sup>
Total Residential Floor Space	Approximately 8,000m <sup>2</sup>
Net Increase of Residential Floor Space	7,800m <sup>2</sup>
Affordable Housing Offer	10% of all residential floor space - 780m <sup>2</sup>

## 8.5 Traffic and Parking

A Transport Impact Assessment has been prepared by ptc and is provided in **Appendix B**. The purpose of the Assessment is to highlight the key road network and transport planning considerations associated with this Planning Proposal.

### Parking Provisions

The DCP applies parking rates based on the location of the site. The site is predominantly in Parking Area 2, with a small portion of the site (75 Crown Street) located in Parking Area 3. Parking Area 3 is categorised as land 200m around Parking Area 1 and 200m around light rail stops and Strategic Bus Corridor routes. As the future development will involve the consolidation of 75 Crown Street into the remaining properties addresses, an assessment of car parking requirements based on Parking Area 2 has been provided. For information purposes, the Transport Impact Assessment also consideration of parking rates in accordance with Parking Area 3.

Under this assessment, the reference scheme would require a total of 90 car spaces consisting of 44 residential spaces and 14 non-residential spaces. The reference scheme provides a total of 65 car parking spaces. However, this provision is considered acceptable as the site is in close proximity to public transport as outlined in **Section 3.2.1**. This includes the St Peters Train Station, Redfern Train Station the Sydenham Metro Station and adjacent bus stops within close proximity to the site. It is further noted that Council letter dated 2 August 2024 indicated support for a reduced parking rate when considering the proximity to public transport.

Additionally, the minor shortfall of car parking can be mitigated through carshare scheme which may enable on-site parking for private cars to be reduced from the rates specified in the DCP.

## Traffic Generation

Based on traffic generation rates in the RMS guide, the Concept Design will result in an additional 50 trips during the peak AM period and 45 trips during the peak PM period. PTC consider these additional generation to be minor and are not expected to significantly impact the operation of the existing road network, particularly noting the recent road upgrades occurring. It is noted that the right turn from Barwon Park Road to Princes Highway operates poorly under existing conditions due to vehicles needing to cross three or more lanes. The proposed redevelopment of the site does not significantly contribute to this existing issue and ptc have recommended TfNSW and Council implement a 'no right turn' restriction on this turn. This can be implemented separate to this Planning Proposal.

## 8.6 Heritage

A Heritage Impact Assessment has been prepared by Curio in **Appendix I**. The Statement confirms that the terrace building is not subject to a heritage listing under the Inner West LEP, nor the State Heritage Register. Undertaking an assessment of significance based on the *Burra Charter*, Curio found that the terrace does not meet the threshold for significance. Additionally, the terrace has no identifiable associations with historic personages or cultural or community groups. The architecture of the item has been heavily modified and adapted in the mid to late 20th century and no longer possesses significant or decorative features that make it unique example of its kind. The terrace is in poor condition and have been found to not be rare or uncommon examples of Victorian terrace construction within both the local and greater Sydney region.

With regards to the surrounding heritage item and Crown Street streetscape, the reference scheme does not seek to replicate period designs or styles of any nearby historic buildings or streetscapes. Rather, the proposed building seeks to reflect the transitional context in which it is situated, between the residential/Victorian style and character of Crown Street and the modern/industrial aesthetic of Campbell Street and the Princes Highway. Through use of red brick rather than concrete or similar and the continuation of street trees, the proposed building will not detract from the general aesthetic character of Crown Street while still fulfilling the intent of activating a busy intersection, providing mixed-use amenity and delivering affordable housing.

Overall, Curio finds that the terrace does not contain heritage significance. It is currently in a poor state and the proposed works offer an opportunity to revitalise a key corner and the proposed mix-use structure will sit comfortably within the surrounding context.

In considering the above, Curio recommends a Photographic Archival Record (PAR) be prepared in accordance with Heritage NSW guidelines to record 75 and 77 Crown Street Terraces prior to demolition.

## 8.7 Contamination

A Preliminary Site Investigation (PSI) has been prepared by JBS&G in **Appendix D**. The objectives of the investigation were to assess the potential for contamination from current and historical site activities.

The PSI identifies that the site was predominantly been used for residential purposes until the 1970s when the southern portion of the land was developed for commercial land uses including an automotive mechanic and commercial bakery. Based on these historic uses and observations made during a site inspection, JBS&G have identified a number of activities that have the potential to result in land contamination. These constraints are typical of urban areas and can readily be dealt with.

Ultimately, JBS&G consider that the site is capable of being made suitable for the proposed uses, subject to the preparation of a Detailed Site Investigation and a Remediation Action Plan at the Development Application stage.

## 8.8 Flood Risk

WMA Water assisted the (now) Inner West Council in the preparation of the Alexandra Canal Flood Study. The Alexandra Canal catchment includes the suburbs of Tempe, St Peters, Alexandria and Mascot. The report indicates that the site is located outside the 1% AEP and the PMF. Minor flooding during the 1% AEP and PMF occurs around the development and (if required) civil infrastructure can be provided during the Development Application stage to manage flood risk.



Figure 20 – 1% AEP Peak Flood Depths

Source: WMA Water



Figure 21 – PMF Peak Flooding Depths

Source: WMA Water

## 8.9 Sustainability Initiatives

A Sustainability Planning Report has been prepared by Northrop and is made available in **Appendix F**. Northrop has reviewed the reference scheme and undertaken an assessment of the project based on current legislation and best practices in Ecologically Sustainable Development (ESD). Ultimately, Northrop has determined that the future development is able to achieve the following targets:

- General compliance with SEPP 65 and the Apartment Design Guide
- At least 15% canopy coverage across the site within 10 years of the completion of the development to enhance amenity and mitigate urban heat.
- Provision of vegetation, green roofs and materials with a high solar reflectance index, with particular focus on western and northern building facades.
- Recycling and Waste Management Plan in accordance with the Marrickville DCP 2011 Section 2.21 – Site Facilities and Waste Management.

These matters will be further explored in the design development stage post Planning Proposal.

The Sustainability Planning Report also includes a range of recommendations for the final design to consider. This includes recommendations on:

- Energy efficiency
- Indoor environment quality
- Water management
- Sustainable transport
- Waste management
- Materials selection
- Land use and ecology
- Community and liveability

These matters will be further explored in the design development stage post Planning Proposal. The future development application will likely comply with the relevant requirements under the Sustainable Buildings SEPP 2021.

## 8.10 Services and Utilities

A Services Report has been prepared by IGS and is made available in **Appendix G**. The Report identifies the existing services and utilities connections on the site and make a recommendation for required services upgrades based on the following assumptions:

- Site area 1,931 m<sup>2</sup>
- 87 apartments
- 845m<sup>2</sup> of commercial / retail GFA
- 81 car spaces over 2 basement levels
- Average population of 2.5 persons per apartment
- Water demand 10 kL/day
- Sanitary / Sewer Discharge 9 kL/day
- Gas 3,000 MJ/h diversified load
- Fire Sprinkler System 10 L/s
- Fire Hydrant System 10 L/s

IGS has identified that the new development will likely require a new onsite substation. The reference scheme has demonstrated that a substation can be integrated into the design of the future development and has included one on the Ground Floor, facing Campbell Street.

Jemena manages gas infrastructure on Campbell Street and Crown Street which has adequate capacity for the proposed development. There are no major existing gas services within the site that will need to be decommissioned and/or diverted.

The site also has an existing connection to NBN high band infrastructure which can cater for the proposed development. No significant augmentation would be required.

With regards to water mains, there is an existing 250mm pipe on Campbell Street which has sufficient capacity to cater for the proposed development.

There is also a 225mm sewer main within the site which has sufficient capacity to serve the proposed development.

Ultimately, the proposed development is capable of being sufficiently serviced by infrastructure, subject to some minor augmentation that will be considered at the Development Application stage.

## 8.11 Structural Engineering Investigation

A preliminary Structural Engineering Investigation has been undertaken by Northrop to address the relationship between the future development on the site and the M4-M5 link tunnels. The investigation is outlined in **Appendix H**.

## 8.12 Social and Economic Impacts

The Planning Proposal generates positive social and economic effects for the local area by delivering high-quality housing and commercial opportunities within the changing urban nature of the surrounding context. Additionally, the Proposal will create local employment during the development's construction and operational stage. It will improve local housing stock close to public transport and amenities, provide greater housing choice, and improve public domain facilities and the pedestrian interface with Princes Highway, Campbell Street and Crown Street to the public domain and will create a more inclusive and integrated interface with the surrounding parkland.

## 9.0 Community consultation (Pt 5)

### 9.1 Consultation undertaken

The following table outlines the Proponent's consultation activities with relevant authorities and agencies. The table also notes the project team's response to feedback and discussion has also been noted.

**Table 14 - Consultation undertaken**

Stakeholder	Purpose / Forum
Inner West Council	Council undertook an initial strategic assessment and provided written comments to the project team. This includes matters that were to be further investigated as part of the Planning Proposal and addressed in this report.
TfNSW	Consultation undertaken with TfNSW is summarised within the statement prepared by Northrop provided at <b>Appendix H</b> .

### 9.2 Proposed consultation

The Proponent's consultation approach will be guided by the principles set out in the Inner West Community Engagement Strategy 2022-24 and the NSW Government's *LEP Making Guidelines*. Formal public consultation will also take place in accordance with Sections 3.34 and 3.35 of the EP&A Act. This is likely to involve notification of the proposal:

- On Council's website.
- In newspapers that circulate widely in Inner West.
- In writing to the adjoining and nearby landowners; relevant community groups; and the surrounding community in the immediate vicinity of the site.

It is noted that confirmation of the public exhibition period and requirements for the Planning Proposal will be given by the Minister as part of the LEP Gateway determination. Any future development application for the site would also be exhibited in accordance with Council's requirements, at which point the public and any authorities would have the opportunity to make further comment on the proposal.

## 10.0 Indicative project timeline (Pt 6)

**Table 15** below provides an indicative timeline for the Planning Proposal, which will be updated as required as progress occurs.

**Table 15 - Indicative project timeline**

Milestone	Timing	Date
Stage 1 – Pre-lodgement	50 days	December 2023 - February 2024
Stage 2 – Planning Proposal	95 days	December 2024 – April 2025
Stage 3 – Gateway determination	25 days	May 2025 – June 2025
Stage 4 – Post-Gateway	50 days	June 2025 - August 2025
Stage 5 – Public Exhibition & Assessment	95 days	August 2025 - November 2025
Stage 6 – Finalisation	55 days	November 2025 - January 2026

# 11.0 Conclusion

The Planning Proposal will facilitate the transformation of this gateway site by:

- Increasing the maximum permissible building height to RL51.00 (35m).
- Increasing the maximum permissible floor space ratio (FSR) to 5:1.
- Including a new Additional Local Provision to allow a limited amount of residential floor space at ground floor level along Crown Street within the MUI zone.

The Planning Proposal appropriately addresses the site specific and strategic merit tests as follows:

- The Planning Proposal is consistent and strategically aligned with the Greater Sydney Regional Plan, Eastern City District Plan, Inner West LSPS, the Local Housing Strategy and the Employment and Retail Lands Strategy.
- The Proposal is consistent with the objects of the EP&A Act, applicable SEPPs and Ministerial Directions.
- The Proposal will deliver approximately 82 units to help address the forecast supply shortfall of low-rise apartments and meet Inner West's housing targets. As noted, this need is emphasised by the Greater Sydney Urban Development Program Dashboard, which shows that the number of building completions in the Inner West over the past 12 months (429) is 47.2% below the previous 5-year average.
- The Planning Proposal seeks to ensure employment floor space is retained in accordance with the Employment and Retail Lands Strategy.
- The additional increase in the maximum height limit (RL51.00 or 35m including plant overrun) is justified given that the additional height does not create any significant constraints such as overshadowing or outlook that cannot be effectively mitigated through urban design measures and directly responds to the emerging opportunity of the site to realise its potential as a gateway corner site.
- The Planning Proposal unlocks housing supply at an appropriate location where there is good access to active transport links, open space, infrastructure, and services.
- The additional massing (an increase in the maximum permissible floor space ratio to 5:1) has been well managed by a well-articulated, appropriately scaled and set back building forms. Despite the additional FSR, the planning proposal results in a smaller overall building footprint, and this creates an opportunity for a generous communal private open space, throughout the site.
- The Proposal is located within walking distance of Sydney Park, a bus corridor, the St Peters Train Station, and shops and services. The transit corridor is well connected to the Sydney CBD, Mascot and the Airport which connects commuters to local employment centres.
- The site is not encumbered by significant constraints, such as fragmentation through strata ownership, contamination, heritage, steep topography or existing special uses.
- The redevelopment of the subject site will respond to the changing urban nature of the surrounding context and will include a well-informed and designed mixed use development that supports and facilitates an appropriate and sympathetic response to greater housing supply, diversity (size and mix) and housing affordability.