



36 Lonsdale Street & 64-70 Brenan Street, Lilyfield

Planning Proposal

Contact Details:

SJB Planning
Level 2, 490 Crown Street
Surry Hills NSW 2010
Australia

T: 61 2 9380 9911
planning@sjb.com.au
www.sjb.com.au

SJB Planning (NSW) Pty Ltd
ABN 47 927 618 527
ACN 112 509 501

Table of Contents



	Executive Summary	5
	Recommendations	6
1.0	Introduction	7
1.1	Overview	7
1.2	Scope and Format of the Planning Proposal	7
1.3	Supporting Plans and Documentation	8
2.0	Site Description and Context	9
2.1	Site Context and Locality	9
2.2	Site Description	13
2.3	Supporting Concept	13
3.0	Planning Framework	14
3.1	A Metropolis of Three Cities	14
3.2	Eastern City District Plan	16
3.3	Leichardt Local Environmental Plan (LLEP) 2013	18
3.4	Leichardt Development Control Plan (LDCP) 2013	20
4.0	The Planning Proposal	23
4.1	Overview	23
4.2	Objectives and Intended Outcomes	23
4.3	Explanations of Provisions	23
4.4	Justification and Strategic Merit	24
4.5	Part 4 – Mapping	33
4.6	Part 5 – Community Consultation	34
4.7	Part 6 – Project Timeline	34
5.0	Conclusion and Recommendations	35

Table of Contents



List of Figures

- Figure 1: Locality map (Source: Google Maps)
- Figure 2: Aerial photo of site (Source: SIX Maps)
- Figure 3: Photo of Lilyfield Light Rail Station
- Figure 4: Photo of the site taken from City West Link/Brenan Street, Lilyfield
- Figure 5: Photo of 66-70 Brenan Street, Lilyfield
- Figure 6: Photo of 64-66 Brenan Street, Lilyfield
- Figure 7: Photo of 36 Lonsdale Street, Lilyfield
- Figure 8: Photo of 32-34 Lonsdale Street, Lilyfield
- Figure 9: Photo of 99 Lilyfield Road, Lilyfield
- Figure 10: Extract from Eastern Harbour City Vision – *'A Metropolis of Three Cities'*
- Figure 11: Extract from LLEP 2013 Land Zoning Map
- Figure 11: Extract from LLEP 2013 Floor Space Ratio Map
- Figure 12: Sub Areas within Catherine Street Distinctive Neighbourhood (Figure C92 from LDCP 2013)
- Figure 13: Proposed amended LLEP 2013 FSR Map
- Figure 14: Proposed FSR Map
- Figure 15: Proposed Height of Buildings Map

List of Tables

- Table 1: Plans and documents prepared to accompany this Planning Proposal
- Table 2: Consistency of the Planning Proposal with SEPP titles
- Table 3: Consistency of the Planning Proposal with Ministerial Directions

List of Attachments

- Attachment 1: Architectural Concepts prepared by Derek Raithby Architects
- Attachment 2: Site Studies prepared by Derek Raithby Architects
- Attachment 3: Transport Impact Assessment prepared by Traffix
- Attachment 4: Detailed Site investigation Report Prepared by EIA

Executive Summary

This Planning Proposal (PP) has been prepared for JRNN Pty Ltd, the owners of the land known as 36 Lonsdale Street, 64-66 Brenan Street, and 68-70 Brenan Street, in Lilyfield (the site). The site has a legal description of:

- Lots 18-20 DP 977323 (36 Lonsdale Street);
- Lot 1 DP 1057094 (64 Brenan Street);
- Lot 22 DP 977323 (66 Brenan Street);
- Lot 2 DP 529451 (68 Brenan Street); and
- Lot 1 DP 529451 (70 Brenan Street).

The PP has addressed the Department of Planning, Industry and Environment's (DPI&E's) publication: Planning Proposals – A Guide to Preparing Planning Proposals (August 2016). Particularly, Section 4.4 of this report addresses the questions to consider when demonstrating the justification and the Strategic Merit Test raised in Question 3(a). The submission and supporting plans and report show that the proposal demonstrates strategic merit when considered against the Strategic Merit Test.

The site extends from the existing industrial site on the corner of Lonsdale and Brenan Streets (36 Lonsdale Street) and incorporates four (4) properties at 64 Brenan Street to 70 Brenan Street to the west, to the corner of Russell Street. 64 Brenan Street is a part one (1) and part two (2) storey commercial building. 66 Brenan Street is occupied by an existing dwelling house, dominated by a high masonry wall and roller door fronting the street. 68 Brenan Street and 70 Brenan Street are each occupied by a dwelling house with no off-street parking or vehicle access. Russell Street is closed to vehicular traffic from Brenan Street, whilst through vehicular access along Lonsdale Street to the south is prevented from the southern boundary of the subject site.

The industrial site at 36 Lonsdale Street is occupied by a part one (1) and part two (2) storey industrial building, and includes upper level office space ancillary to the industrial use of the property.

This PP seeks to amend the maximum floor space ratio (FSR) provisions under the Leichhardt Local Environmental Plan (LLEP) 2013 that currently apply to the site.

The site, within the Inner West Council local government area (LGA), is currently zoned R1 General Residential under LLEP 2013. LLEP 2013 imposes a maximum FSR of 0.6:1 (pursuant to the provisions of Clause 4.4(2B)(a)(iv)). The PP proposes to amend the LLEP 2013 map to apply an FSR of 2:1 on the land, and to apply a maximum height of buildings development standard of a maximum RL of 33.2m.

This PP provides an analysis of the physical and strategic planning constraints, and the opportunities of the site, and considers the relevant environmental, social, and economic impacts of the proposal and its strategic merit.

The proposal is supported by an offer to enter into a Voluntary Planning Agreement (VPA) with Council providing a share of the value uplift as a consequence of the PP.

The proposal does not require any other consequential amendments to the LLEP 2013.

The Proposal is supported by architectural drawings prepared by Derek Raithby Architects (Attachment 1), and a Traffic Impact Assessment prepared by Traffix (Attachment 3).

The architectural drawings provide a concept for a five (5) storey residential flat building development, that could potentially accommodate, under the proposed amendment to the maximum FSR, 49 dwellings. The development concept has been assessed against State Environmental Planning Policy No. 65— Design Quality of Residential Flat Development (SEPP 65), the Apartment Design Guide (ADG) and Leichardt Development Control Plan (LDCP) 2013, and has been found to satisfactorily address the relevant provisions relating to building separation, context relationships, and future residential amenity. The massing has been configured to demonstrate that development can occur on the land without any additional shadow impact to residential properties to the south.

In relation to potential traffic and parking impacts, the traffic impact assessment concludes that the surrounding road network can accommodate the increased density. In particular, it concludes that the concept development:

- Has the potential to accommodate a compliant provision of car parking on-site, thereby resulting in reduced on-street parking demands over present conditions; and
- Will generate identical or slightly less traffic during peak periods compared to existing developments on-site.

The PP is considered to demonstrate strong strategic merit for the following reasons:

- Consistency with *'A Metropolis of Three Cities'* and the *'Eastern City District Plan'*, providing additional accommodation in well located and serviced areas;
- The site is located approximately 50m from the Lilyfield Light Rail Station, with a frequency of trams running every 10 minutes during peak;
- The site is situated within 200m of bus stops on Catherine Street and Lilyfield Road, that are serviced by routes connecting the Sydney CBD and surrounding region;
- The site proposes to enter into a VPA to share the value uplift;
- The PP can be accommodated utilising the existing road network, which has been assessed as being capable of accommodating the increased residential development capacity; and
- The location of higher density, multi-unit housing close to existing public transport is also consistent with the desired future character of the locality, particularly at this location, as per LDCP 2013.

Recommendations

It is recommended that arising from the consideration of this PP, Inner West Council resolve to support the changes to LLEP 2013 as detailed in this PP, and forward the PP for a Gateway Determination to undertake the following:

- Amend the Floor Space Ratio Map (Map Sheet FSR_004) to show a maximum FSR of 2:1 applying to the site; and
- Impose a height of buildings maximum development standard of a maximum RL of 33.2m.

In support of the amendments to LLEP 2013, an offer to enter into a VPA is proposed to share in the value uplift.

1.0 Introduction

1.1 Overview

This Planning Proposal (PP) has been prepared for JRNN Pty Ltd, the owners of the land known as 36 Lonsdale Street and 64-66 Brenan Street, and 68-70 Brenan Street, in Lilyfield (the site). The site has a legal description of:

- Lots 18-20 DP 977323 (36 Lonsdale Street);
- Lot 1 DP 1057094 (64 Brenan Street);
- Lot 22 DP 977323 (66 Brenan Street);
- Lot 2 DP 529451 (68 Brenan Street); and
- Lot 1 DP 529451 (70 Brenan Street).

This PP seeks to amend the maximum FSR provisions under LLEP 2013, that currently apply to the site. LLEP 2013 imposes a maximum FSR of 0.6:1 to the site (pursuant to the provisions of Clause 4.4(2B)(a)(iv)).

The PP is seeking to amend the Floor Space Ratio Map (map sheet FSR_004) to show a maximum FSR of 2:1 applying to the site, and apply a maximum height of buildings development standard of a maximum RL of 33.2m AHD.

An offer to enter into a VPA with the Council regarding sharing the value uplift is proposed.

The PP has been prepared in accordance with the DPI&E's publication: Planning Proposals – A Guide to Preparing Planning Proposals, dated December 2018.

1.2 Scope and Format of the Planning Proposal

The PP details the merits of the proposed changes to LLEP 2013 and has been structured in the following manner:

- Section 1.0 provides an introduction to the PP;
- Section 2.0 provides a description of the site, its context and existing development;
- Section 3.0 identifies the planning framework applying to the site, and considers the PP against relevant strategic plans and policies;
- Section 4.0 is the Planning Proposal, and is provided consistent with the matters to be considered in the DPI&E's A Guide to Preparing Planning Proposals; and
- Section 5.0 provides the conclusions and recommendations to proceed with the PP to Gateway Determination to amend LLEP 2013.

1.3 Supporting Plans and Documentation

This Proposal has been prepared with input from a number of technical and design documents which have been prepared to accompany the application. These documents are included as Attachments to this report and are identified in Table 1.

Document name	Prepared by
Architectural Concepts	Derek Raithby Architects
Site Survey	Derek Raithby Architects
Traffic Impact Assessment	Traffix
Detailed Site Investigation	EI Australia

Table 1: Plans and documents prepared to accompany this Planning Proposal

2.0 Site Description and Context

2.1 Site Context and Locality

The subject site is located in the suburb of Lilyfield, located 6km west of the Sydney CBD. The site has frontage to the City-West link, a major traffic artery to and from the Sydney CBD, and linking to other major east-west and north-south roads serving the local and metropolitan area. The site is approximately 50m west of the Lilyfield Light Rail Station.

The site is located directly opposite a part two (2) and part five (5) storey shop-top housing development bound by Lonsdale Street, Brenan Street, and Catherine Street. This development includes an IGA supermarket at ground level. The section of Lonsdale Street that provides frontage to both 36 Lonsdale street and the IGA site is physically closed towards the northern end, thereby providing vehicular access only to these two (2) properties.

To the south, beyond the landscaped and fenced barrier in Lonsdale Street, are one (1) and two (2) storey attached and detached dwellings.

64, 66, 68, and 70 Brenan Street have long north-south orientations, with frontage to the City-West Link and a rear boundary with the northern side boundary of 37 Russell Street, a single storey dwelling house with an east-west orientation.

The general locality is characterised by a range of residential dwelling types, and to the south, east, and west is largely residential in character.

The locality of the site and the existing urban area are shown in Figures 1 to 9 below.

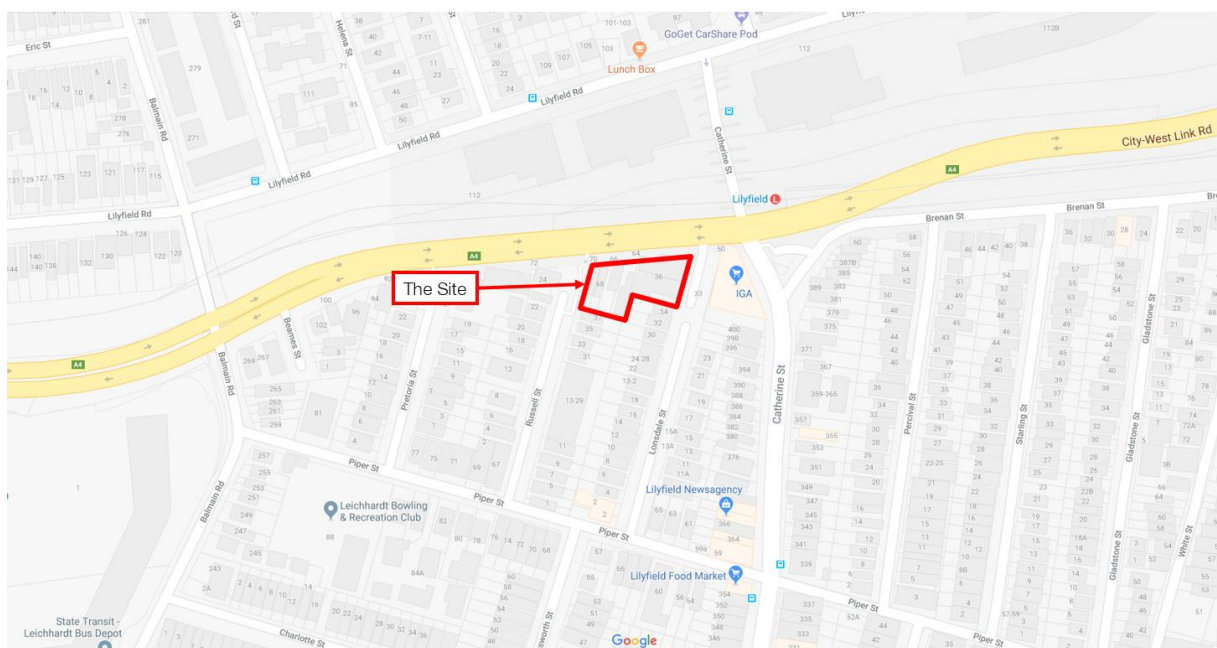


Figure 1: Locality map (Source: Google Maps)



Figure 2: Aerial photo of site (Source: SIX Maps)



Figure 3: Photo of Lilyfield Light Rail Station



Figure 4: Photo of the site taken from City West Link/Brennan Street, Lilyfield



Figure 5: Photo of 66-70 Brenan Street, Lilyfield



Figure 6: Photo of 64-66 Brenan Street, Lilyfield



Figure 7: Photo of 36 Lonsdale Street, Lilyfield



Figure 8: Photo of 32-34 Lonsdale Street, Lilyfield



Figure 9: Photo of 99 Lilyfield Road, Lilyfield

2.2 Site Description

The subject site is an irregular shaped land holding and comprised of properties known as 36 Lonsdale Street, and 64-70 Brenan Street, Lilyfield. The site has a legal description of:

- Lots 18-20 DP 977323 (36 Lonsdale Street);
- Lot 1 DP 1057094 (64 Brenan Street);
- Lot 22 DP 977323 (66 Brenan Street);
- Lot 2 DP 529451 (68 Brenan Street); and
- Lot 1 DP 529451 (70 Brenan Street).

The site extends from the existing industrial site on the corner of Lonsdale and Brenan Streets (36 Lonsdale Street) and incorporates four (4) properties at 64-70 Brenan Street to the west, to the corner of Russell Street. 64 Brenan Street is a part one (1) and part two (2) storey commercial building. 66 Brenan Street is occupied by an existing dwelling house dominated by a high masonry wall and roller door fronting the street. 68 Brenan Street and 70 Brenan Street each are occupied by a dwelling house with no off-street parking/vehicle access. Russell Street is closed to vehicular traffic from Brenan Street whilst through vehicular access along Lonsdale Street to the south is prevented from the southern boundary of the subject site.

The industrial site at 36 Lonsdale Street is occupied by a part one (1) and part two (2) storey industrial building, and includes upper level office space ancillary to the industrial use of the property.

2.3 Supporting Concept

The PP request is supported by an Architectural Concept Design and Site Survey prepared by Derek Raithby Architecture (Attachments 1 and 2 respectively).

The concepts demonstrate the ability for the site to accommodate residential flat buildings up to six (6) storeys.

The concepts demonstrate the ability of residential development to provide required deep soil provision, ADG consistent building separation, and the capacity to satisfy required solar access and natural ventilation.

The architectural concepts also demonstrate the ability for development on the site to the FSR proposed to minimise adverse solar access impacts upon adjoining, existing residential development.

3.0 Planning Framework

3.1 A Metropolis of Three Cities

The subject site is located just west of the Eastern Economic Corridor and Harbour CBD, within the Eastern Harbour City, as identified in the Greater Sydney Region Plan – ‘A Metropolis of Three Cities’.

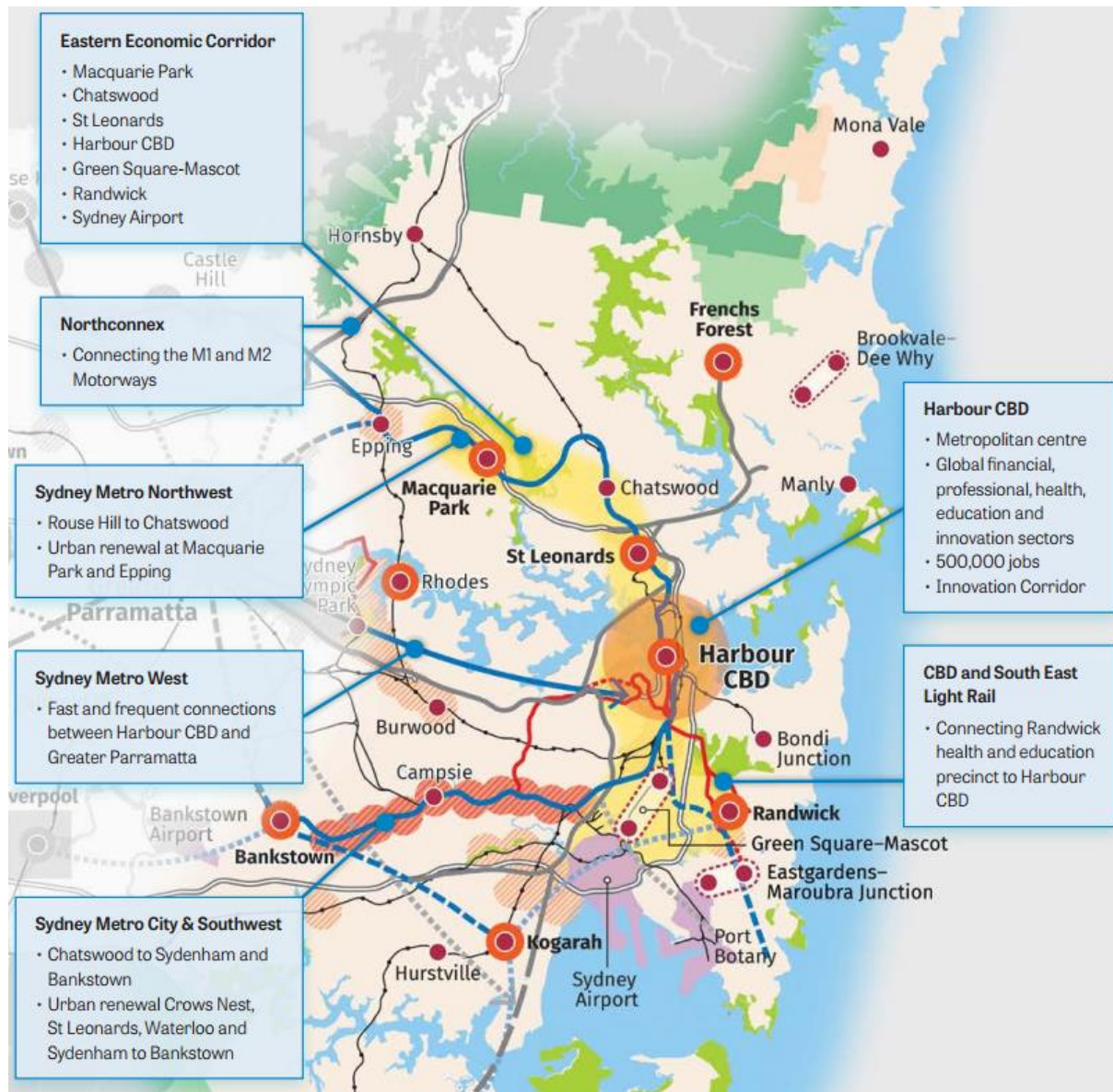


Figure 10: Extract from Eastern Harbour City Vision – ‘A Metropolis of Three Cities’

The proposal is consistent with the broad directions of ‘A Metropolis of Three Cities’ through:

- Assisting the state government in achieving its target of an additional 725,000 new dwellings for the metropolitan region by 2036, in an area well connected to employment and transport;
- The provision of additional residential floor space outside of the identified core employment areas, but highly accessible to the Sydney CBD;

- Facilitating development of a site which is highly accessible by public transport;
- Improving resident access to jobs, services, and recreation opportunities; and
- Accelerating housing supply, choice and affordability and building great places to live.

The pursuit of an increased FSR at the site is consistent with the following Directions and Objectives of the plan:

3.1.1 Direction 1 – A city supported by infrastructure

“Infrastructure supporting new developments”

Objective 4: Infrastructure use is optimised

The subject site is located 50m west of the Lilyfield Light Rail Station. In this regard, the increased density on the site will ensure that the use of existing infrastructure is optimised.

3.1.2 Direction 2 – A collaborative city

“Working together to grow a Greater Sydney”

Objective 5: Benefits of growth realised by collaboration with governments, community and business

The PP is supported by an offer to enter into a VPA with the Inner West Council. Expenditure of the VPA will be determined by Council.

3.1.3 Direction 3 – A city for people

“Celebrating diversity and putting people at the heart of planning”

Objective 7 Communities are healthy, resilient and socially connected

The site is located in a highly accessible area, with easy walkable access to a wide range of local services and facilities, as well as being close to public transport, enabling short commutes to an even wider range of employment, education, entertainment, and service facilities. The location fosters ready access to these services, and facilities access by means other than the private vehicle (e.g. via light rail, buses, and cycling), as well as ready access to the Harbour CBD.

3.1.4 Direction 4 – Housing the city

“Giving people housing choices”

Objective 10 - Greater housing supply

The proposal has the potential to provide approximately 49 dwellings, in a well serviced location, close to public transport, jobs, and support facilities. The site currently accommodates only three (3) dwellings.

The additional housing capacity is an extension of the established general residential area, with access to all necessary amenities and services.

Objective 11 – Housing is more diverse and affordable

The proposal is supported by an offer to enter into a VPA to share in the value uplift that would accrue from the amendment to the LEP. The monetary value will be utilised by Council in the funding of a variety of potential projects, including Council’s affordable housing programs.

Objective 12 – Great places to bring people together

The site is in a location that is in readily walkable access to transport, shops, and open space.

The frontage to the City West Link represents a terminating street block, with through-site links not providing access to any feature. The proposal will however provide an address to Lonsdale Street, improving the appearance of this frontage. The site and locality is well suited to the provision of high amenity residential accommodation given the access to facilities and services ready available to the site.

3.1.5 Direction 6 – A well-connected city

“Developing a more accessible and walkable city”

Objective 14 –Integrated land use and transport creates walkable and 30-minute cities

The site is highly accessible to a range of public transport options, including Lilyfield Light Rail Station (50m east of the site), bus services within 200m of the site connecting to the Sydney CBD and surrounding region, and cycle networks. This transport accessibility, in conjunction with ready walkable access to a diverse range of local services and recreational opportunities, supports ready accessibility to many facilities within well under 30 minutes. The transport access provides ready connectivity to the Eastern Economic Corridor and the Harbour CDB in an easy 30 minutes travel time.

The site is located in an area suitable to encourage walking and cycling as alternate modes of transport.

3.1.6 Direction 8 - A city in its landscape

“Valuing green spaces and landscape”

Objective 30: Urban tree canopy cover is increased

The site known as 36 Lonsdale Street is occupied boundary to boundary by an industrial building. The concepts demonstrate that landscaping and deep soil landscaping can be introduced to the site, consistent with the requirements of LLEP 2013.

The introduction of landscaping to the site will contribute to the canopy of the locality.

3.1.7 Direction 4 – An Efficient City

“Using resources wisely”

The proposal seeks to accommodate additional housing choice in a location well suited to the utilisation of public transport options and where cycling and walking are highly viable transport alternatives. These opportunities reduce the reliance upon private vehicle transport and associated emissions. In addition, any new housing will be built to contemporary standards of environmental performance.

3.2 Eastern City District Plan

The Inner West Council is located within the Eastern City District, identified under the District Plans prepared by the Greater Sydney Commission. The plans include a number of Planning Priorities that are to be considered by planning authorities in making strategic planning decisions.

The relevant Planning Priorities from the Eastern District Plan relating to this proposal are addressed below.

3.2.1 Planning Priority E1 – Planning for a city supported by infrastructure

The opportunity to increase the housing density is in a location well serviced by public transport infrastructure, namely the Lilyfield Light Rail Station (50m east of the site), and bus services within 200m of the site. The site is already zoned for residential purposes, with this PP seeking to maximise the efficiency of the utilisation of the land.

3.2.2 Planning Priority E5 - Providing housing supply, choice and affordability with access to jobs, services and public transport

The proposal has the capacity to deliver high quality, higher density living in conjunction with the provision of affordable housing as part of the mix. The dwelling mix will be weighted towards one (1) bedroom, and two (2) bedroom apartments, to provide more affordable stock on this well located site and, in recognition of the attraction to this size of dwelling close to the Sydney CBD, and excellent public transport infrastructure.

The concept scheme consists of 14 one (1) bedroom, 28 two (2) bedroom, and seven (7) three (3) bedroom apartments.

The site currently accommodates a total of three (3) dwellings, whilst the proposed concept will deliver approximately 49 dwellings. This will boost the Eastern City District's opportunity to meet its 5 year housing targets, with the Inner West Council aiming to deliver 5,900 dwellings of the District's total target of 46,550 dwellings to 2021. The proponent's timeframe would have the development completed within three (3) years (commencing December 2018) providing a genuine contribution to the targets. Dwellings delivered in this earlier timeframe will contribute to the 20 year target of 157,500 dwellings for the east district. Given the transport, employment, education and urban support facilities that are readily accessible from the site, it is prudent urban management to ensure that the best use of the available capacity is utilised. Otherwise, this land in this location, once developed, will not be capable of delivering additional housing for a significant period.

The proposal is supported by an offer to enter into a value uplift share VPA. The expenditure of the funds collected will be determined by Council, and could include affordable housing.

3.2.3 Planning Priority E6 - Creating and renewing great places and local centres, and respecting the District's heritage

The increase in density on the subject site will assist in delivering a well-designed built environment, particularly in terms of responding to the local character and activating the public domain to make the area more attractive and safe.

Much of the site is currently occupied by an existing warehouse building and use, which is non-compliant in the current R1 General Residential zoning, but operating under existing use rights. The proposed scheme will better activate all street frontages (i.e. Lonsdale Street, Brennan Street, and Russell Streets) with the main living areas of dwellings, including balconies, providing casual surveillance of the public domain.

Whilst the site is not listed as a heritage item or located within a conservation area, the retention of the existing warehouse façade, as part of the proposed scheme, could assist in maintaining the established character of the area, as well as providing an interpretation of the site's former industrial use. The mix of existing and former industrial buildings with residential development is typical of the local character.

The site is highly accessible to a range of local amenities such as transport and open space. The site is located adjacent to a supermarket, providing a wide range of products to support the day to day needs of residents.

3.2.4 Planning Priority E12 – Retaining and managing industrial and urban services land

The proposal does not seek to alter the underlying zone or land use permissibility, noting the site's current R1 General Residential zoning. The proposed amendment to LLEP 2013 seeks to amend the FSR control only. The proposed redevelopment of the site would extinguish an existing non-conforming warehouse use currently operating under existing use rights at 36 Lonsdale Street, as well as a commercial use at 64 Brennan Street as envisaged with the site's current zoning. Furthermore, the site is located outside of the core industrial lands identified in the District Plan.

3.2.5 Planning Priority E14 - Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways

The redevelopment of the site for higher density housing will provide opportunities to deliver a more effective stormwater management system on-site that will capture and appropriately dispose of stormwater, and will allow for groundwater absorption, and capture and reuse of stormwater. This, together with the phasing out of a non-conforming industrial premises on-site, will ultimately improve the water quality, health, and enjoyment of Sydney Harbour and the District's waterways.

3.2.6 Planning Priority E15 - Protecting and enhancing bushland and biodiversity

The site is existing developed urban land. The development of the site remains within the urban footprint and does not adversely impact upon biodiversity or flora communities.

3.2.7 Planning Priority E17 - Increasing urban tree canopy cover and delivering Green Grid connections

The concepts propose the delivery of deep soil zones along the southern and western boundaries of the site, measuring between 2.275m to 6m. In total, 21% (442m²) of the site is provided as deep soil zone landscaped area. This landscaped area could readily accommodate substantive urban tree canopy planting opportunities. The concept design also retains all existing street tree plantings surrounding the site.

3.2.8 Planning Priority E19 - Reducing carbon emissions and managing energy, water as waste efficiently

The location and access to facilities and infrastructure is highly suitable to fostering reliance upon transport options other than the private vehicle.

The location of the site is highly suitable to support residential development to contemporary standards of environmental performance.

3.3 Leichardt Local Environmental Plan (LLEP) 2013

The PP seeks to amend LLEP 2013 relating to FSR and Height of Buildings Maps. It is proposed that the FSR Map (Sheet 004) is amended to permit a maximum FSR of 2:1 on the site. A maximum height of buildings of a maximum RL of 33.2m AHD.

The existing R1 General Residential zone applying to the site accommodates land use permissibility.

The concepts demonstrate achieving 21% deep soil landscaped area.

3.3.1 Part 4 - Principal Development Standards

The site is not affected by a height limit under the LLEP 2013 Height of Buildings Map.

The proposal does not seek to alter any other development standards of LLEP 2013, including 'landscaped areas for residential accommodation in Zone R1' as per Clause 4.3A, including site coverage. In fact, the proposed residential scheme accompanying the proposal demonstrates a compliant landscaped area of 21% (min. 20%) and site coverage of 60% (max. 60%).

The site is zoned R1 General Residential under LLEP 2013, as illustrated in the extract of the Land Zoning Map in Figure 11.



Leichhardt Local Environmental Plan 2013

Land Zoning Map - Sheet LZN_004

Zone

B1	Neighbourhood Centre
B2	Local Centre
B4	Mixed Use
B7	Business Park
IN2	Light Industrial
R1	General Residential
R3	Medium Density Residential
RE1	Public Recreation
RE2	Private Recreation
SP1	Special Activities
SP2	Infrastructure
DM	Deferred Matter
SREP	Sydney Regional Environmental Plan No. 26 – City West
CP	Callan Park

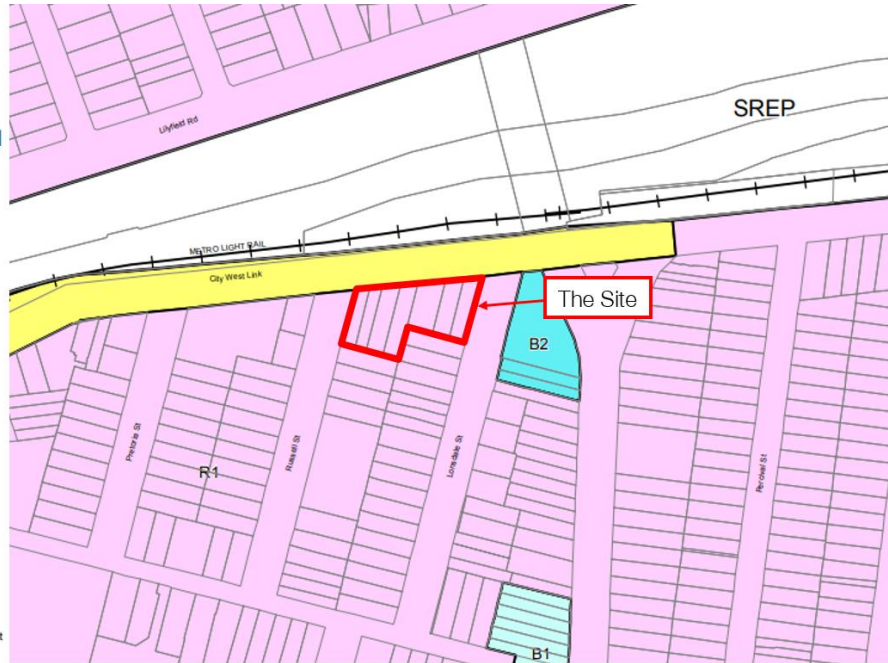


Figure 11: Extract from LLEP 2013 Land Zoning Map

The objectives of the R1 General Residential zone are:

- To provide for the housing needs of the community.
- To provide for a variety of housing types and densities.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To improve opportunities to work from home.
- To provide housing that is compatible with the character, style, orientation and pattern of surrounding buildings, streetscapes, works and landscaped areas.
- To provide landscaped areas for the use and enjoyment of existing and future residents.
- To ensure that subdivision creates lots of regular shapes that are complementary to, and compatible with, the character, style, orientation and pattern of the surrounding area.
- To protect and enhance the amenity of existing and future residents and the neighbourhood.



Leichhardt Local Environmental Plan 2013

Floor Space Ratio Map Sheet FSR_004

Maximum Floor Space Ratio (n:1)

D	0.5
N	1.0
S	1.5
T	2.15
Refer to clause 4.4 A	
Refer to clause 4.4 2B (a)	
Refer to clause 4.4 2B (b)	
Refer to clause 4.4 2B (c)	
Refer to clause 4.4 2B (d)	



Figure 11: Extract from LLEP 2013 Floor Space Ratio Map

3.3.2 Part 6 – Additional Local Provisions

Acid Sulfate Soils (Clause 6.1)

The site is identified under LLEP 2013 as being within a Class 5 Acid Sulfate Soils Area.

The requirements of Clause 6.1 would be relevant to any future Development Application (DA) considerations. It is noted that the site has an RL of 14.28m at the lowest point. Any excavation is unlikely to reach RL 5m, or lower the water table by 1m.

Flood planning (Clause 6.3)

The City West Link (Brenan Street) to the immediate north of the site is identified as being affected by the 100 Year ARI Flood Extent. Lonsdale Street is unaffected.

The potential flood impact of the inundation of the City West Link would be able to be addressed with any future DA.

Adaptive reuse of existing buildings in Zone R1 (Clause 6.11)

The PP request seeks to amend the FSR applying. It is unlikely that a future DA for the site would rely upon this provision.

Diverse housing (Clause 6.13)

The diverse housing provision will apply to any future DA.

The proposal has included a preference towards studio, one (1) bedroom, and two (2) bedroom dwellings, consistent with the intent of this provision.

Development control plans for certain development (Clause 6.14)

The site is less than 3,000m² in area. Accordingly, this provision of the LEP is not applicable.

3.4 Leichardt Development Control Plan (LDCP) 2013

Future development on the site will be subject to the provisions of LDCP 2013. The DCP provides a more detailed layer of planning controls for residential development. It is considered that the proposed development will be able to achieve a high level of compliance with the requirements of the DCP and/or satisfactorily address the objectives of the relevant controls. Some of the key and relevant areas of the DCP, as they apply to the proposed residential development, are discussed below:

3.4.1 Part B – Connections

Given the close proximity of the site to public transport options and local services and facilities, the PP will promote urban design that encourages active travel options such as walking, cycling and public transport between homes, workplaces, centres and attractions.

The health and well being of the community will also be enhanced by the PP via the active travel options available from site that will prioritise this type of travel over the use of private cars. The proposed residential development will also activate and address the public domain to deliver improved casual surveillance of surrounding streets thereby creating safer, more vibrant and attractive streetscapes.

No adverse social impacts are envisaged as a result of the proposal and a detailed social impact statement will be provided with future development in accordance with the DCP.

3.4.2 Part C – General Provisions (Section 1)

Equity of Access and Mobility

The development concept provides equitable and convenient access to and throughout the building, including all public/communal areas. Accessible car parking spaces are also identified within the basement car park. These matters would be addressed at DA stage, with the concept demonstrating the ability of the requirement to be addressed.

Parking

The development concept demonstrates that the site is capable of accommodating the minimum car parking requirements of the DCP, including resident, visitor, car share, and accessible car parking. Bicycle and motor cycle parking is also provided in accordance with the DCP.

Landscaping

Approximately 442m² or 21% of the site is allocated for landscaped area. This meets and exceeds the minimum standards required under LLEP 2013. The area provided is capable of providing landscaping to meet the requirements of Council's DCP.

3.4.3 Part C – Urban Character (Section 2)

The subject site is located within the 'Lilyfield Distinctive Neighbourhood' and specifically within the 'Catherine Street Distinctive Neighbourhood'. The Catherine Street Neighbourhood is further broken down into distinct sub-areas, with their own established characters and desired future characters. The site is identified as being wholly within the 'The Peripheral' sub-area.

In terms of the Catherine Street Neighbourhood, it is noted that one of the pertinent controls is to "encourage larger buildings consisting of a variety of accommodation types at the edge of the Distinctive Neighbourhood". The proposal does exactly that, by seeking to provide a residential flat building accommodating a mix of apartment types, supported by a VPA for the value uplift sharing.

The 'Peripheral Sub Area' (refer to Figure 13) is described in the DCP:

"The Peripheral Sub Area consists of the length of the City West Link west of Catherine Street to the junction of Balmain Road, and from this point on Balmain Road south to the intersection with Moore Street.

The Peripheral Sub Area is not as distinctive as the core of the neighbourhood, due to the variety of development within the area. The change in character in Balmain Road is more transitional, whereas the City West Link has a clear physical departure from the homogenous character of the remainder of the neighbourhood. This is reinforced by road barriers and a change of level at the end of Russell, Pretoria and Lonsdale Streets. Although there are still pockets of detached, single storey cottages evident in the Peripheral Sub Area, it represents more of a mixed area in terms of built form and use. This change helps to define the boundary of the neighbourhood.

With the introduction of the nearby Lilyfield Light Rail stop, and the mix of commercial and residential uses in this area, there is potential for Council to make provision for future multi-unit development around this node. The location, and mixed residential/commercial character of the road, lends itself to higher density development. Balmain Road also has potential for a mixture of permissible commercial uses.

It is appropriate to maintain this area's transitional nature and provide for contemporary designed buildings and a variety of uses, particularly approaching corner sites. Such development would not be intrusive or out of character with this area, as compared with the majority of the Distinctive Neighbourhood."

The subject site is adjacent to the road barriers identified in this statement that provide a clear physical barrier to the remainder of the homogeneous neighbourhood character, to appropriately enable the introduction of larger buildings of varied built form. The sub area has also notes the presence of the Lilyfield light Rail stop and the opportunity to make provision for higher density multi-unit development around this node. The proposal clearly achieves this vision whilst also ensuring that the built form is not intrusive to existing residential development to the south via responsive building separation and form. This in turn ensures no adverse amenity impacts, such as overshadowing, overlooking and visual impact.



Figure 12: Sub Areas within Catherine Street Distinctive Neighbourhood (Figure C92 from LDCP 2013)

3.4.4 Part C – Residential Provisions (Section 3)

This part of the DCP contains more detailed controls that will guide assessment for any future development application. By virtue of its site layout and overall building design, the development concept appropriately addresses or is capable of addressing the relevant specific provisions contained in this section of the DCP. It should also be noted that the proposed development will also be required to address the specific provisions of SEPP 65 and the ADG, that prevail over the provisions of the DCP.

As noted previously, the proposed building separation/setback to the southern boundary, building form, and layout ensures that the development suitably addresses the potential amenity impacts arising from overshadowing, overlooking and visual impact.

4.0 The Planning Proposal

4.1 Overview

This section addresses the DPI&E publication Planning Proposals – A Guide to Preparing Planning Proposals (August 2016). This section provides:

- Objectives and intended outcomes;
- Explanation of provisions;
- Justification;
- Mapping;
- Community consultation; and
- Project timeline.

4.2 Objectives and Intended Outcomes

The objective of this PP is to amend the FSR and height of building development standard that applies to the site to facilitate a redevelopment of the site that:

- Provides residential accommodation in a well serviced location with high levels of access to employment, transport, and urban services;
- Contributes to the five (5) year inner west dwelling target of 5900 dwellings to 2021, and the 20 year district target of 157,500 dwellings;
- Optimise the utilisation of existing and current capital expenditure on transport infrastructure; and
- Maintain the amenity of existing residential development.

4.3 Explanations of Provisions

The PP does not seek to amend the underlying land use zone of R1 General Residential. To facilitate the redevelopment of the site with a residential flat development of approximately 49 dwellings, as depicted in the supporting architectural plans prepared by Derek Raithby Architects (refer to Attachment 1), the amendment proposed comprises amending the LLEP 2013 FSR Map (Sheet FSR_004) to impose a maximum FSR of 2.25:1 across the site as depicted in Figure 13.



Figure 13: Proposed amended LLEP 2013 FSR Map

4.4 Justification and Strategic Merit

This section addresses the need for the rezoning (i.e. amendment to the LLEP 2013 FSR Map), identifies the background studies undertaken, why the PP is the best approach and what the community benefits will be.

4.4.1 Section A – Need for the Planning Proposal

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

The Planning Proposal is not a result of a broad strategic study.

The FSR adopted for the site stems from the gazettal of LLEP 2013 in December 2013 based strategic studies before that time. It is noted that the FSR adopted was that imposed by the previous LLEP 2000. Since the gazettal of the LLEP 2013, there have been substantial shifts in strategic planning context and Government priorities that recognise the need to pursue greater housing supply and affordability, particularly in locations with access to jobs and public transport. These factors support the request to better utilise the available urban land already zoned for residential purposes.

The Greater Sydney Region Plan – ‘A Metropolis of Three Cities’ and associated ‘Eastern City District Plan’, as discussed in Sections 3.1 and 3.2 of this PP, identified the need for greater housing supply and affordability in locations with access to jobs and public transport. The subject site which is located only 50m from a light rail station, 200m to bus services and less than 6km west of the centre of Sydney’s CBD is consistent with these directions to be explored for increased housing potential.

In addition to the above priorities, the PP is also supported by:

- Architectural Plans prepared by Derek Raithby Architects;
- Site studies prepared by Derek Raithby Architects; and
- Traffic Impact Assessment prepared by Traffix.

The site study has undertaken a context analysis and review to test the capability of the site to accommodate additional development. The testing has been informed by the preparation of an architectural concept to prove the capability for the site to accommodate a development. The testing of impacts relating to solar access, visual impacts, and capacity of the transport network supports the conclusion that the site is suitable for detailed consideration to support a greater density than currently permitted.

Of most significance is the consideration of the impact of the building mass that could be achieved under the proposed development standard.

The site study at Attachment 2 provides a comparison of existing solar access impact with the scheme approved in 2007 and the proposed envelope. The testing undertaken has supported the pursuit of a “split tower” approach accommodating the greater height and the corners of the site.

The architectural plans prepared by Derek Raithby Architects, demonstrate that the proposed development of the site for a residential flat building accommodating 49 apartments is capable of complying with the design quality principles and relevant provisions of SEPP and the ADG. Furthermore, consideration has been given to ensure that there is no adverse impact (e.g., amenity and environmental) on adjoining and nearby properties, the public domain, streetscape and local character of the area.

The Traffic Impact Assessment (TIA), prepared by Traffix, has modelled the traffic generation of the proposal and its potential impacts upon the surrounding transport/road network. The TIA also examined the adequacy of the off-street parking. In summary, the TIA found that appropriate parking will be provided to the development and that the road network will be able to accommodate the additional traffic from the proposed development. In fact, the TIA has concluded that the proposed development is likely to improve existing traffic and parking conditions on and around the site through lessening of pressure on on-street parking, via a compliant provision of parking on-site, as well as traffic generation rates that are identical if not less than that generated by existing developments on-site.

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

The PP is considered the best option as it will allow the redevelopment of the site in a manner that is compatible with the concepts prepared. The variation to the FSR control could not reasonably be pursued via a variation under Clause 4.6 of LLEP 2013.

Further, the PP approach provides a mechanism for the proponent to deliver substantial public benefits not otherwise required under the existing controls. This will provide contributions to Council's affordable housing portfolio in an appropriate location and otherwise consistent with its Affordable Housing Policy (2016).

4.4.2 Section B – Relationship to Strategic Planning Framework – The Strategic Merit Test

In considering if a PP should proceed to gateway determination, strategic merit is to be demonstrated. Section B – Relationship to Strategic Planning Framework from 'Planning Proposals' – A Guide to Preparing Planning Proposals (August 2016) provides the matters to be considered when determining strategic merit.

The particular matters to be considered are addressed below.

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)?

The consideration of the strategic framework at Section 3.0 confirms the consistency of the proposal relating to:

- Acceleration of housing supply in well serviced areas, close to public transport, jobs, recreation and support facilities (e.g., retail, health and education);
- Provision of housing supply in close proximity to existing public transport options to ensure infrastructure use is optimised;
- Delivery of housing choice and affordable rental housing in targeted areas; and
- Provision of housing in a locality that does not diminish employment or urban services land.

Q3(a). Does the proposal have strategic merit? Will it:

- Give effect to 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
- Give effect to a relevant local council strategy that has been endorsed by the Department or required as part of a regional or district plan or local strategic planning statement; or
- Respond to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls?

The consistency of the proposal with 'A Metropolis of Three Cities' and the 'Eastern City District Plan' has been addressed in detail in Section 3.0 of this PP. One of the key priorities of both these plans is the provision of "housing supply, choice and affordability with access to jobs, services and public transport". The strategic decision to zone the land residential has already been made. This PP seeks to increase the potential housing capability of the site.

In terms of housing delivery, the 'Eastern City District Plan' seeks to deliver a total of 46,550 dwellings across the district, with the Inner West Council being targeted to provided 5,900 of these dwellings. The planning proposal aims to deliver approximately 49 dwellings on a site that currently only accommodates three (3) dwellings. This is a significant contribution from site towards the District's housing targets, particularly noting the site's close proximity to public transport and the centre of Sydney's CBD.

The planning proposal also has strategic merit in that it is consistent with Council's strategy to increase the delivery of affordable housing. To this effect, in November 2016, the Council released its Affordable Housing Policy in an effort to actively seek the increase in supply of affordable housing through its planning instruments and policies. The policy was adopted in recognition of ongoing loss and non-replacement of affordable housing via gentrification and general redevelopment. Accordingly, the Policy adopted by Council was in response to changing circumstances and demographic trends that have not been recognised by existing planning controls.

One of the mechanisms identified in the Policy to deliver much needed affordable housing in the area is via 'value capture', implemented through VPAs. A value uplift sharing VPA is proposed. The

In considering the three (3) points raised in the strategic merit test, the request is considered to have strategic merit as:

- The request has been demonstrated to be consistent 'A Metropolis of Three Cities' and with the 'Eastern City District Plan';
- It is responding to the housing demand forecasts identified in the District Plan;
- It is responding to the need to deliver more affordable housing, as per the District Plan, because of demographic and general redevelopment trends causing the ongoing loss and non-replacement of affordable housing; and
- The request is consistent with Council's Affordable Housing Policy which was underpinned by the Department in April 2018 with its inclusion of the Inner West LGA in SEPP 70.

Q3(b). Does the proposal have site specific merit, having regard to the following:

- The natural environment (including known significant environmental values, resources or hazards);
- The existing uses, approved uses, and likely future uses of 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?

The site is existing developed urban land and therefore does not have impacts upon significant environmental values or natural resources. The site is not subject to natural hazards of land slip or geotechnical instability. The site is not identified as being affected by the 100 year ARI, or being bushfire prone land.

The subject site is zoned R1 General Residential. A substantive portion of the site contains a non-conforming light industrial/warehouse building and use at 36 Lonsdale Street. The PP will facilitate the redevelopment of the site for residential flat building, a permissible use, including the delivery of much needed affordable housing. The existing and likely future uses of land in the vicinity of the proposal is general residential, as well as mixed use development. The PP is directly opposite a part two (2) and part five (5) storey shop-top housing development bound by Lonsdale Street, Brennan Street, and Catherine Street. The adjacent development includes an IGA supermarket on the ground floor.

The sites key merit is its proximity to solid public transport options, such the Lilyfield Light Rail Station (50m from the site), which connects the site to a wide range of employment, education, health, retail, and other key services and facilities. In fact, it is only a short commute to the centre of Sydney's CBD, which is only 6km east of the site. It is also within walking distance of local services and facilities.

Q4. Will the planning proposal give effect to Council's endorsed Local Strategic Planning Statement, or another endorsed local strategy or strategic plan?

Council, through the preparation of LLEP 2013, has already made the strategic decision to zone the land for residential purposes. The Local Strategic Planning statement is yet to be endorsed.

The PP request is supported by architectural concepts to test the ability of the FSR proposal to be accommodated on the site without adverse impacts. The potential development yield has also been tested from a traffic impact consideration.

The traffic assessment determined that development on the site is capable of being accommodated within the existing transport network and utilising existing public transport availability.

The proposal is consistent with many of the Strategic Directions as the proposal supports:

- Minimising the City's ecological footprint by reusing existing urban land and supporting public transport usage, walking, and cycling;
- Supports growth in a location providing housing and supporting jobs and services in the locality;
- Improves the use of existing urban land, well served by public transport;
- Maximises residential potential outside of the identified core employment lands; and
- Encourages walking, cycling, and public transport uses.

Council also has a suite of strategic documents relevant for consideration which are addressed below.

Our Inner West 2036 – Community Strategic Plan

The Community Plan outlines the goals and priorities of Council to 2036.

The PP is consistent with the principle of working together in a way that is creative, caring and just, as well as the relevant strategic directions.

Strategic Direction 1 – An Ecologically Sustainable Inner West

The proposal facilitates the renewal of existing urban land to accommodate housing choice in a well serviced location. The proposal can reduce private vehicle reliance, accommodate housing choice close to jobs and services, and introduce landscaping to a former industrial site.

Strategic direction 2: Unique, liveable, networked neighbourhoods

The proposal is located adjacent to the existing neighbourhood centre of Lilyfield and public transport. There are excellent public transport connections to open space and recreation facilities.

Leichhardt Community and Cultural Plan 2011-2021

The relevant strategic objectives are considered below:

Strategic Objective 1 – Connecting people to each other

The proposal would renew the site located adjacent public transport and a neighbourhood node. The development would be connected to the community.

Strategic Objective 2 – Connecting people to place

The proposal is supported by a value uplift VPA offer. The VPA has the potential to be allocated to a range of facilities and upgrades as determined by Council.

Integrated Transport Plan – Leichhardt 2013-2023

The proposal aligns with the strategies and actions for transport through:

- Assisting to create an urban village with good public transport and cycle network accessibility;
- Accommodation of bicycle facilities within a future development;
- Location of housing in an area capable of encouraging mode shift to sustainable options; and
- Readily walkable access to day to day needs and recreation opportunities.

Inner West Delivery Program 2018-2022

The delivery program identifies the means of delivering the Community Strategic Plan.

The proposal does not conflict with the priority to manage development.

Future development is capable of and would be required to meet sustainability targets, and does not impede upon heritage neighbourhoods.

The proposal encourages the use of sustainable modes of transport, and is supported by a VPA offer for value uplift sharing that could be allocated to address Council’s priorities.

Q5. Is the planning proposal consistent with applicable state environmental planning policies?

The consideration of these SEPPs and deemed SEPPs has identified that the PP does not conflict with any of these policies:

SEPP Title	Consistency	Comment
19. Bushland in Urban Areas	Yes	The proposal is unlikely to have adverse impacts upon urban bushland.
44. Koala Habitat Protection	Yes	The site does not include potential koala habitat.
55. Remediation of Land	Yes	The PP does not alter land use permissibility or introduce permissibility for sensitive land uses. Past land use would continue to be considered at Development Application stage as required by Clause 7 of the SEPP.
64. Advertising and Signage	N/A	Should the PP proceed future development would be subject to the provisions of this SEPP.
65. Design Quality of Residential Flat Development	Yes	The concept residential flat building development for the site has had regards to the principles of SEPP 65.
70. Affordable Housing (Revised Schemes)	Yes	The provisions of the SEPP apply to the Inner West Council and will be addressed by future development applications.
SEPP (Building Sustainability Index: BASIX) 2004	Yes	This SEPP is relevant to specific development that would be permitted on the land. Future development would need to comply with these provisions.
SEPP (Housing for Seniors or People with a Disability) 2004	Yes	This SEPP is relevant to specific development that would be permitted on the site and would need to comply with these provisions should this development be pursued.

SEPP Title	Consistency	Comment
SEPP (Infrastructure) 2007	Yes	This SEPP is relevant to particular development categories. This PP does not derogate or alter the application of the SEPP to future development.
SEPP (Exempt and Complying Development Codes) 2008	Yes	This SEPP is relevant to particular development categories. This PP does not derogate or alter the application of the SEPP to future development.
SEPP (Affordable Rental Housing) 2009	Yes	This SEPP is relevant to particular development categories. This PP does not derogate or alter the application of the SEPP to future development.
SEPP (Vegetation in Non-rural Areas) 2017	Yes	This SEPP is relevant to particular development categories. This PP does not derogate or alter the application of the SEPP to future development.
SREP (Sydney Harbour Catchment) 2005	Yes	Consideration of this deemed SEPP will continue to apply relating to management of water quality entering the Sydney Harbour Catchment.

Table 2: Consistency of the Planning Proposal with SEPP titles

Q6. Is the planning proposal consistent with applicable Ministerial Directions (S9.1 Directions)?

The PP would be consistent with all relevant Directions as detailed below:

S9.1 Direction Title	Consistency	Comment
1.0 Employment and Resources		
1.1 Business and Industrial Zones	N/A	
1.2 Rural Zones	N/A	
1.3 Mining, Petroleum Production and Extractive Industries	N/A	
1.4 Oyster Aquaculture	N/A	
1.5 Rural Lands	N/A	
2.0 Environment and Heritage		
2.1 Environment Protection Zones	N/A	
2.2 Coastal Protection	N/A	
2.3 Heritage Conservation	Yes	There are no known matters of heritage significance required to be considered for the site and there are no heritage items located on the site.
2.4 Recreation Vehicle Areas	N/A	
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	N/A	
3.0 Housing, Infrastructure and Urban Development		
3.1 Residential Zones	Yes	The proposal is considered to be consistent with the direction, including the potential to broaden housing choice and provision in a location able to make

S9.1 Direction Title	Consistency	Comment
		efficient use of existing infrastructure and services. The range of housing includes 15% of the uplift as Affordable Rental Housing that would be dedicated free of charge to the Council.
3.2 Caravan Parks and Manufactured Home Estates	NA	
3.3 Home Occupations	Yes	Home occupations will continue to be permitted, to be carried out in dwelling houses without the need for development consent.
3.4 Integrating Land Use and Transport this Ministerial Direction	Yes	The PP is considered to be consistent with this Direction through: <ul style="list-style-type: none"> The Proposal will provide housing in a location that will be well serviced by public transport and in a location able to support cycling and/or walking to jobs and other services and facilities; Providing an opportunity for residential development that improves opportunities for travel by means other than by car; and Supports the efficient and viable operation of public transport services.
3.5 Development Near Licensed Aerodromes	N/A	
3.6 Shooting Ranges	N/A	
4.0 Hazard and Risk		
4.1 Acid Sulphate Soils	Yes	The site is identified under LLEP 2013 as being potentially affected by acid sulfate soils. The site is mapped within the Class 5 area of potential affectation and is directly adjacent to land mapped as Class 3 potential affectation. Clause 6.1 of LLEP 2013 provides detailed provisions for the management of acid sulfate soils as per the Acid Sulfate Planning Guidelines. This PP does not derogate or alter the application of the LLEP 2013 to future development.
4.2 Mine Subsidence and Unstable Land	NA	
4.3 Flood Prone Land	Yes	The site is not identified as flood prone land.
4.4 Planning for Bushfire Protection	N/A	
5.0 Regional Planning		
5.2 Sydney Drinking Water Catchments	N/A	
5.9 North West Rail Link Corridor Strategy	N/A	
5.10 Implementation of Regional Plans	Yes	The PP is consistent with the Regional Plan 'A <i>Metropolis of Three Cities</i> ' and has been specifically addressed in the PP request.

S9.1 Direction Title	Consistency	Comment
6.0 Local Plan Making		
6.1 Approval and Referral Requirements	Yes	The PP is consistent with this Ministerial Direction.
6.2 Reserving Land for Public Purposes	Yes	The PP is consistent with this Ministerial Direction.
6.3 Site Specific Provisions	Yes	The PP is consistent with this Ministerial Direction.
7.0 Metropolitan Plan Making		
7.1 Implementation of the Metropolitan Strategy	Yes	The PP is consistent with the relevant actions from 'A Metropolis of Three Cities' and the 'Eastern City District Plan' as detailed within this submission.

Table 3: Consistency of the Planning Proposal with Ministerial Directions

4.4.3 Section C – Environmental, Social and Economic Impact

Q7. 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?

The request for a PP is for existing developed urban land and is not considered to have any adverse impacts upon threatened species, population or ecological communities.

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

Natural Environment

As noted above, the proposal for existing developed urban land and is not considered to have any adverse impacts upon threatened species, population or ecological communities.

The PP will promote increased urban tree canopy on the site with the concept residential development plans indicating that substantive deep soil zones are capable of being delivered along the southern and western boundaries of the site of up to 6m in width. Under the scheme, 16% of the site will be provided with deep soil zones and a total of 23% of the site will be landscaped, which meets and exceeds the LLEP 2013 (Clause 4.3A) minimum landscape area requirement of 20% for residential development in Zone R1.

There are no other identified adverse effects on the natural environment as a result of the proposal.

Built Environment

In terms of traffic and transport, the Traffic Impact Assessment (TIA), prepared by Traffix, accompanying the proposal concludes that the road network will be able to accommodate the additional traffic from the proposed development and that appropriate parking can be facilitated on-site to service the development. In fact, the TIA has concluded that the proposed development is likely to improve existing traffic and parking conditions on and around the site through lessening of pressure on on-street parking, via a complaint provision of parking on-site, as well as traffic generation rates that are identical if not less than that generated by existing developments on-site.

The parking is provided entirely within the basement, thereby enhancing streetscape outcomes for the site, with access via Lonsdale Street. Access to the site via Lonsdale Street will further ensure that there are no adverse traffic impacts on local streets noting that vehicular access further along Lonsdale Street to the south is restricted with a barrier.

In terms of site planning, the proposed development has been designed to maximises side/rear setbacks to adjoining properties (i.e. to the south) as well as provide maximum deep soil zones in that area. Adequate building (including basement) separation is provided to those areas.

The proposed development proposes to retain the existing façade of the existing industrial/warehouse building on the corner of Lonsdale Street and Brenan Street, and proposes to construct a similar façade treatment extending to the corner of Russell Street. A nil building line setback is proposed to Lonsdale Street and Brenan Street, commensurate to the built form of the mixed use development opposite on the corner of Lonsdale Street and Catherine Street. A 3.225m building line setback is provided to Russell Street, commensurate to setbacks provided in that street. The building will also address all street frontages to activate and provide casual surveillance to the public domain.

The proposed building has also been setback, and heights minimised along the southern property boundary to ensure that adequate solar access is provided to surrounding/adjoining properties.

Visual and acoustic privacy to surrounding and nearby properties has been appropriately addressed by maximising side/rear setbacks and concentrating as many openings as possible onto the streets/public domain.

The proposed development has been designed having regard to the design principles of SEPP 65 and the ADG. In terms of the ADG, the architectural plans accompanying the PP demonstrate general compliance with its provisions such as cross ventilation, solar access, communal open space, and building separation/setbacks.

As discussed at Section 3.4 of this PP, the proposed development also addresses the existing and desired future character provisions for the area as defined in LDCP 2013. The development is located within the 'Peripheral Sub Area' of the 'Catherine Street Neighbourhood'.

In terms of the Catherine Street Neighbourhood, one of the pertinent controls of the DCP for the area is to *"encourage larger buildings consisting of a variety of accommodation types at the edge of the Distinctive Neighbourhood"*. The proposal does exactly that, by seeking to provide a residential flat building accommodating a mix of apartment types, including 15% of dwellings as affordable housing.

For the "Peripheral Sub Area" of the Catherine Street Neighbourhood, the DCP notes the presence of the Lilyfield light Rail stop and the opportunity to make provision for higher density, multi-unit development around this node. The proposal clearly achieves this vision too.

Q9. How has the planning proposal adequately addressed any social and economic effects?

Social Effects

The site does not contain any items of known heritage significance, and is highly disturbed from previous development.

The proposal includes the provision of five (5) dwellings as affordable rental housing in a location that is highly accessible to public transport, employment, services, and education. This highly desirable outcome is consistent with key strategic and social planning policies outlined in 'A Metropolis of Three Cities', 'Eastern City District Plan', SEPP 70, and Inner West Council's Affordable Housing Policy.

The PP is not considered to present any adverse social impacts.

Economic Effects

The proposed redevelopment of the site would extinguish an existing non-conforming warehouse use currently operating under existing use rights at 36 Lonsdale Street, as well as a commercial use at 64 Brenan Street. However, this was envisaged and accounted for with the site's current R1 General Residential zoning. Furthermore, the site is located outside of the core industrial/employment lands identified in the District Plan.

The proposal has the potential to deliver a range of positive economic impacts, with the provision of a significant level of affordable rental housing that is well located to suit a range of potential key worker groups. The potential to provide affordable rental accommodation closer to employment opportunities and transport improves the prospect of reducing commute times with the consequent social benefits that can provide.

In general, the proposal delivers housing that has excellent access to public transport, and consequently access to jobs and other services. This in turn reduces the demand on private vehicle usage and promotes increased patronage and utilisation of the Government’s investment in the Light Rail system.

The PP is not considered to present any adverse economic impacts.

Q10. Is there adequate public infrastructure for the planning proposal?

In terms of services, the subject site is located in an urbanised area that is well serviced by sewer, water, stormwater, electricity and telecommunications. In this regard, the site is already connected to these services, and these are considered to be adequate for the planning proposal too. However, any need to augment existing utility services will be undertaken as required.

In relation to transport infrastructure, the site is well serviced and adequate for the proposal, noting:

- The site is located approximately 50m of the Lilyfield Light Rail Station, with a frequency of trams running every 10 minutes during peak; and
- The site is situated within 200m of bus stops on Catherine Street and Lilyfield Road that are serviced by routes connecting the Sydney CBD and surrounding region.

Q11. What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway Determination?

This section will be completed following consultation with any State and Commonwealth Public Authorities identified in the Gateway Determination. However, the PP is consistent with the latest strategic planning policies and Government approach to increase housing supply in appropriate locations.

4.5 Part 4 – Mapping

It is requested that the LLEP 2013 FSR Map be amended as follows:



Figure 14: Proposed FSR Map
The amended mapping proposes a new FSR of 2.15:1 and a height of buildings of 19m across the site.



Figure 15: Proposed Height of Buildings Map

4.6 Part 5 – Community Consultation

It is expected that community consultation will be pursued consistent with standard practice of:

- Notification of surrounding land owners;
- Public notification in local newspapers; and
- Notification on Council’s website.

Consultation will also have regard to the requirements set down in the Gateway Determination issued by the Director-General of the DPI&E.

During the exhibition period, the Planning Proposal, Gateway Determination, and other relevant documentation will be available on Council’s Customer Service Centre and on Council’s website.

4.7 Part 6 – Project Timeline

The project timeline is to be determined by Council.

5.0 Conclusion and Recommendations

This Planning Proposal for 36 Lonsdale Street and 64-70 Brenan Street, Lilyfield seeks to retain the R1 General Residential zone, but amend the FSR development standard.

The amendments to the development standard requested would facilitate the redevelopment of the site to accommodate a five (5) storey residential flat building containing 49 apartments.

The PP request ensures that the potential of the site is best realised to maximise the benefit of the site's proximity to public transport and consequential access to employment, education and urban services. It is also noted that the centre of Sydney's CBD is only a short 6km commute. It is also within easy walking and cycling distance of local services and facilities.

The location of higher density multi-unit housing close to existing public transport is also consistent with the desired future character of the locality, and particularly at this location, as per LDCP 2013.

The site configuration and arrangement has been demonstrated to be capable of achieving ADG amenity requirements and avoids adverse impact upon nearby residential areas.

The supporting traffic study also indicates that the local road system can accommodate the proposal, without any adverse impacts, and that the site is well serviced by public transport – namely, light rail and bus services. The proposed development also accommodates an appropriate and compliant level of off-street car parking.

It is therefore requested that arising from the consideration of this PP request that the LLEP 2013 be amended in the following manner:

- Amend the Floor Space Ratio Map (Map Sheet LZN_004) to show a maximum FSR of 2:1 applying to the site; and
- Amend Height of Buildings Map (Map Sheet HOB_004) to show maximum height of buildings of a maximum RL of 33.2m AHD.

The PP has been confirmed to demonstrate no change to solar access enjoyed by residential properties to the south. This has been achieved by limiting development to the rear of the site and providing a landscaped buffer to these dwellings.



Attachments

Attachment 1: Architectural Concepts prepared by Derek Raithby Architects

Attachment 2: Site Studies prepared by Derek Raithby Architects

Attachment 3: Transport Impact Assessment prepared by Traffix

Attachment 4: Detailed Site investigation Report Prepared by EIA