



ASSESSMENT CHECKLIST

PLANNING PROPOSAL APPLICATION No. PPAP/2023/0001

11 & 11A Edinburgh Road Marrickville

1. Planning Proposal (LEP Amendment Request) Application Details

Planning Proposal Application Number:	PPAP/2023/0001
Property Address:	11 & 11A Edinburgh Road, Marrickville
Legal Description:	Lot 1 DP 607677 Lot 67 DP 4991
Date of Lodgement:	Submitted via TechOne 7/09/2023 Date of original lodgement i.e. Fees Paid 21/09/2023 Lodgement of revised scheme 1/11/2024
Type of Planning Proposal (Basic/Standard/Complex):	Standard
Pre-Planning Proposal meeting Minutes (If attended):	Pre-lodgement advice is attached under Appendix I.
Proponent:	The Trust Company Limited c/- Urbis Pty Ltd
Owner/s of the property Notification (Written and signed):	The Trust Company Limited as Custodian for National Storage Property Trust
Current zoning:	E4 - General Industrial
Description of Proposal:	To amend the Inner West LEP 2022 with site specific development standards: <ul style="list-style-type: none"> allowing additional FSR of 2.25:1 resulting in a total 3.2:1 FSR for self-storage premises only, introducing a maximum building height control of 30m, and requiring a minimum 7.5% of the site area as deep soil planting.
Does it propose to reclassify public land?	No
Related projects or similar Planning Proposals (any that would impact upon the outcome of this project for e.g. Strategic Sites and Corridor Study):	Not applicable
Site visit undertaken:	8 November 2023

1. Planning Proposal (LEP Amendment Request) Application Details

Site Description/Context

11 and 11A Edinburgh Road, Marrickville form a rectangular shaped lot of approximately 7,127 m².

The site is currently occupied by two 2-storey warehouse buildings with an at-grade loading area that is occupied by National Storage and a single storey building occupied by a smash repairs workshop.

The site has a 94m frontage to Edinburgh Road along the southern boundary, a 94m frontage to Smidmore Street along the northern boundary and a 67m frontage to Murray Street on the western boundary. The eastern boundary of the site abuts 54 Smidmore Street, a vehicle repair station.

The site currently accommodates a self-storage facility and a vehicle body repair workshop.

The site is zoned E4 - General Industrial and the maximum FSR for the site is 0.95:1 under the Inner West Local Environmental Plan 2022 (IWLEP 2022). There is no height of building development standard for the site.

The site topography varies from approximately RL 4.5m AHD on the southern and western boundaries of the site and RL 5.7m AHD in the eastern and northern parts of the site.

The site is in a floodplain and parts of the site would be impacted during a 1% Annual Exceedance Probability (AEP) event.

Description of all existing uses and existing development on the land:

- Two 2-storey warehouse buildings with an at-grade loading area that is occupied by National Storage (self-storage facility)
- A single storey building occupied by a vehicle body repair workshop
- Hardstand parking and loading areas throughout the site (see below images)

History of the subject site:

Determination no. 1749, dated 4 November 1957, approved the erection of a brick storeroom to be used for light paper fancy goods.

Determination no. 10671, dated 8 December 1986, approved an application for the purpose of metal plate cutting and related light engineering work.

DA201700178, approved 12 July 2017, use of the premises for motor vehicle mechanical and smash repairs workshop with associated signage.

Aerial photographs

Key views in Figure 1 below correspond with the site photos on following page.

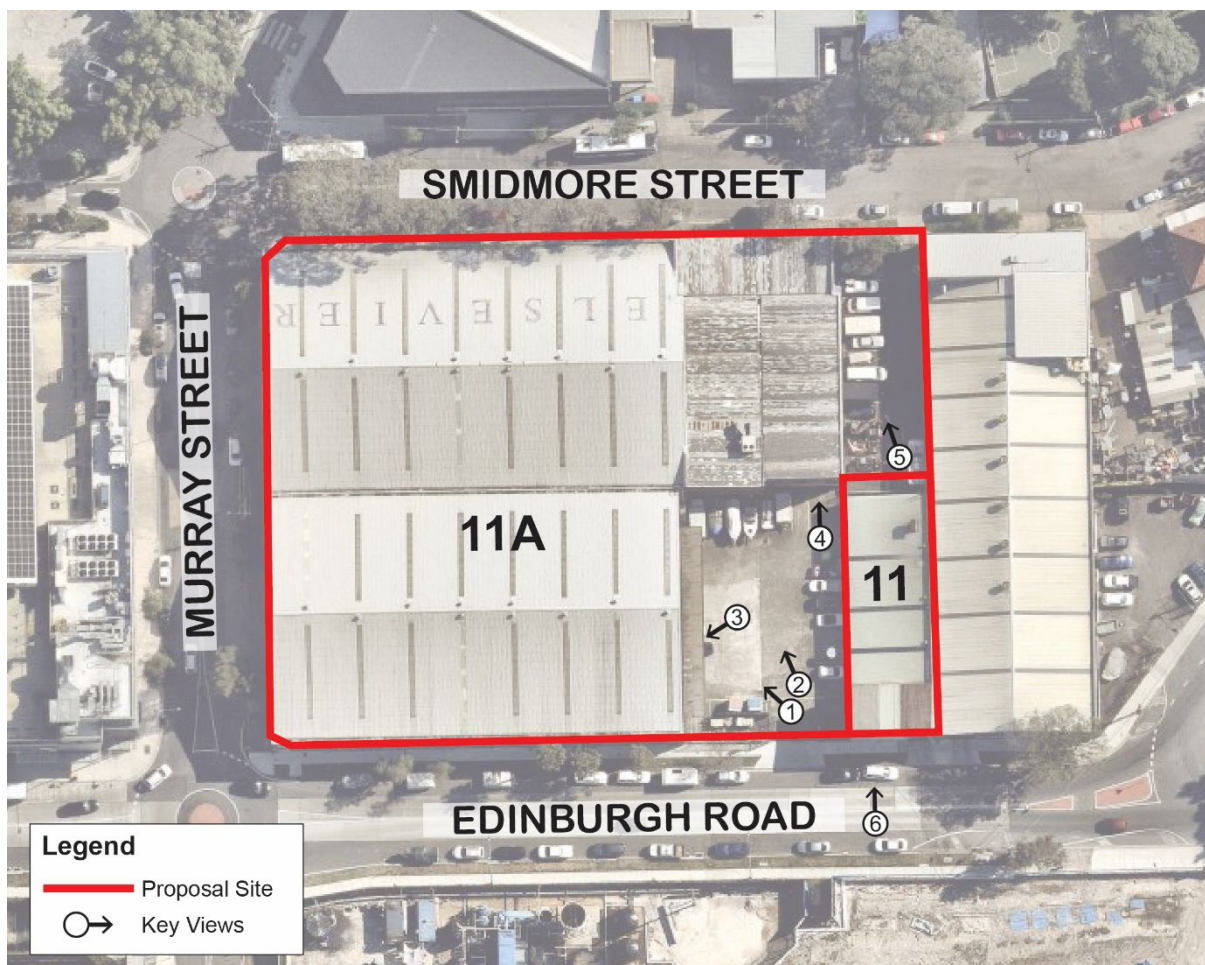


Figure 1 - Aerial photograph with key views

Site photos

(Photos taken by Council, 8 November 2023)



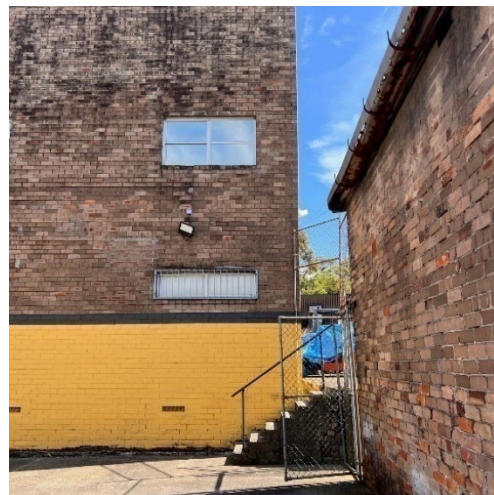
1. National Storage from Edinburgh Road



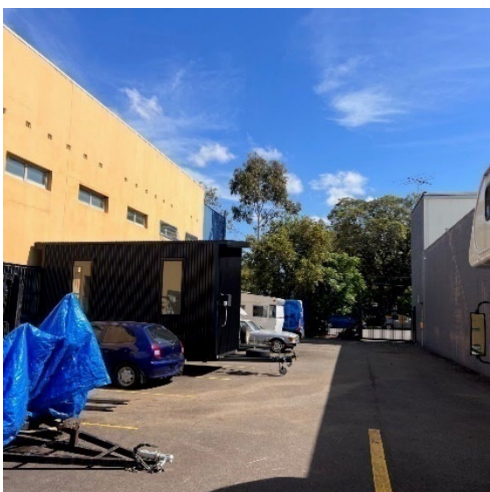
2. Parking & loading area



3. Internal view of self-storage



4. Mid-block level change



5. Parking area



6. Smash and auto repair shop

Figure 2 – Montage of Key Views

1. Planning Proposal (LEP Amendment Request) Application Details

Description of surrounding properties:

East of site:

Properties to the east of 11 & 11A Edinburgh Rd are primarily industrial uses including car services and scrap yards. Further to the east, situated on the same block as the site, is an office/retail business.

- a. 54 Smidmore St – Haa Haa Scooter, Motorbike and Car Rental, Marrickville
- b. 58 Smidmore St – Wolverton Scrap Metals
- c. 211 Edgeware Rd – Ironbin Pty Ltd, , JT Autocare, Marrickville Auto Repairs, Damn Good Productions
- d. 1/3 Edinburgh Rd – Metro Service Centre

South of site:

- e. Sydney Metro train stabling yards

North of site:

- f. 1-3 Smidmore Rd – Complex of businesses (light industrial, retail)
- g. St Pius' Catholic Primary School
Subject site is opposite rear edge of school comprising of private open space and playgrounds.

West/Northwest of site:

- h. Marrickville Metro Shopping Centre
Adjacent to the site is Marrickville Metro, a sub-regional shopping centre that is anchored by major tenants including Kmart, Woolworths, Aldi, and Coles and accommodates over 100 specialty stores including restaurants and food courts set across two sites. Access is provided via Murray Street and Smidmore Street with over 1,600 parking spaces being available across the two sites.
- i. Woolworths fulfillment centre (approved but not constructed)
To comprise of a two-storey warehouse and 7-storey office building. The customer fulfilment centre will receive, store and dispatch online grocery orders for delivery to customers' homes. Vehicle access and egress during operation of the customer fulfilment centre will be via one of four driveways on Sydney Steel Road and two driveways on Edinburgh Road.

Figure 3 on page 7 identifies each of these surrounding businesses or land uses on a map.

Any former Council resolutions:

N/A

Surrounding properties



Figure 3 - Map of surrounding properties

Legend

- Proposal Site
- Ⓐ Haa Haa Scooter, Motorbike and Car Rental, Marrickville
- Ⓑ Wolverton Scrap Metals
- Ⓒ Marrickville Auto Repairs, JT Autocare, Ironbin Pty Ltd, Damn Good Productions
- Ⓓ Metro Service Centre
- Ⓔ Sydney Metro Development
- Ⓕ Complex of Industrial businesses
- Ⓖ St Pius' Catholic Primary School
- Ⓗ Marrickville Metro Shopping Centre
- Ⓘ Approved Woolworths Customer Fulfilment Centre

2. Site Affectations (affecting whole or part of the site)

Affectation	Y/N	Comment
Is the site a Heritage Item? If so insert Item Number(s).	No	
Is the site a Draft Heritage Item?	No	
Is the site Listed on the State Heritage Register?	No	
Is the site subject to an Interim Heritage Order?	No	
Is the site Listed as a Heritage Item in a State Environmental Planning Policy (includes SREPs)?	No	
Is the site located within Conservation Area? If so insert name of the conservation area.	No	
Is the site in the vicinity of any Heritage Items? If so insert Heritage Item Number(s) and descriptions.	No	
What Acid Sulfate Soils Class(es) affects the site?	Yes	Class 2
Is the site Flood affected? (This includes tidal inundation)?	Yes	Overland Flood Affected
Is the site located within the foreshore area (Foreshore building line)?	No	
Is the site reserved for a public purpose?	No	
What Australian Noise Exposure Forecast contour located within?	Yes	20-25 Australian Noise Exposure Forecast (ANEF) 2039
Is the site affected by any road widening or realignment?	No	
Is the site or any part of the site reserved for acquisition?	No	
Is there an order under the Tree (Disputes Between Neighbours) Act 2006?	No	
Is there a site compatibility certificate (Seniors Housing, Infrastructure, Affordable Rental Housing)?	No	
Is the site a Boarding House?	No	

2. Site Affectations (affecting whole or part of the site)

Affectation	Y/N	Comment
Does Council have information on the subject land relating to contamination and /or is the site identified on Council's GIS Contamination Layer on latitude? If so provide details.	No	
Is the site located within close proximity to Port or Railway Land or any other land uses that could have adverse impacts upon the amenity of the site?	Yes	Sydney Metro stabling yards
Are there any site specific provisions (additional permitted uses) applying to the site?	Yes	The E4 - General Industrial Zone has vehicle repair workshops as an additional permitted use.
Development applications		
Are there any recent or contentious development applications for the site?	Yes	DA201700178 was approved on 12 July 2017 for use of the premises as a motor vehicle mechanical and smash repairs workshop with associated signage.
Outstanding notices		
Are there any outstanding notices and orders applying to the subject site?	No	
Caveats or other property restrictions		
Are there any caveats or other property restrictions affecting the site?	No	
Development contributions – Identify applicable plans		
Inner West Local Infrastructure Contributions Plan 2023	Yes	Local contributions applicable at development application stage.
Environmental Planning and Assessment Amendment (Housing and Productivity Contributions) Act 2023	Yes	State contributions applicable at development application stage.

Section A – Need for the Planning Proposal

PART 1 - OBJECTIVES AND INTENDED OUTCOMES

This section must provide a clear and concise description of the planning proposal and be written in plain English, so it is easily understood by the community.

Objectives

- To increase the allowable floor space on site for self-storage uses.

Intended outcomes

- Increase the supply of land for the purposes of a self-storage facility.
- Support the growth of the Eastern Economic Corridor through the provision of additional industrial floor space which will support the growing demand for self-storage floor space which caters to time sensitive and last mile distribution across the eastern and south-eastern suburbs of Sydney.
- Leverage the site's strategic location to support international trade gateways, being Sydney Airport, Port Botany and the Sydney CBD, including their current operations, capacity and future growth.
- Provide increased support industry floorspace in the form of self-storage uses to respond to the growing domestic demand for self-storage resulting from increased dwelling density and apartment living.
- Incentivise the revitalisation of the site and contribute to addressing the shortage of self-storage space.

PART 2 - EXPLANATION OF PROVISIONS

This section must provide a detailed statement of how the objectives or intended outcomes will be achieved by amending an existing LEP.

Intended provisions

To amend the IWLEP 2022 by including a new site-specific provision for the subject site at 11-11A Edinburgh Road, Marrickville under Part 6 as per below:

- allow the development to exceed the mapped FSR of 0.95:1 by 2.25:1 for self-storage uses. This would result in an overall FSR of 3.2:1 for self-storage units only.
- set a maximum height of building of 30m (RL34.53) for the new development seeking to utilise the additional FSR.

- require a minimum of 7.5% of the site area to be provided as deep soil planting.

The Planning Proposal also seeks to identify the site on the Key Sites Map (see Figure 4 below) for application of the above site-specific provision.

No changes to the zone or permitted uses are proposed.



Figure 4 – Proposed Key Sites map

PART 3 - JUSTIFICATION OF STRATEGIC AND SITE-SPECIFIC MERIT

This section must provide a detailed assessment of the proposal’s strategic and site-specific merit to determine whether the Planning Proposal should be supported – Refer to Sections A to E below.

Determine: Satisfactory, unsatisfactory, or not applicable

Question 1.

Is the Planning Proposal a result of an endorsed LSPS, strategic study or report?

Satisfactory.

The Planning Proposal gives effect to Inner West Council’s Employment and Retail Lands Strategy (EaRLS) which sets out principles to ensure the long-term supply of industrial land, more commercial space and identifies distinct areas of business and employment lands. It provides clear controls for productive commercial and industrial land uses to facilitate job growth and thriving economies.

The site is within an EaRLS identified Key Employment Land as shown in Figure 5.

Action 9.1 of the Inner West LSPS is to implement the EaRLS which includes “*Preparing LEP provisions to preserve industrial and urban services land and provide additional opportunities to provide urban services.*”

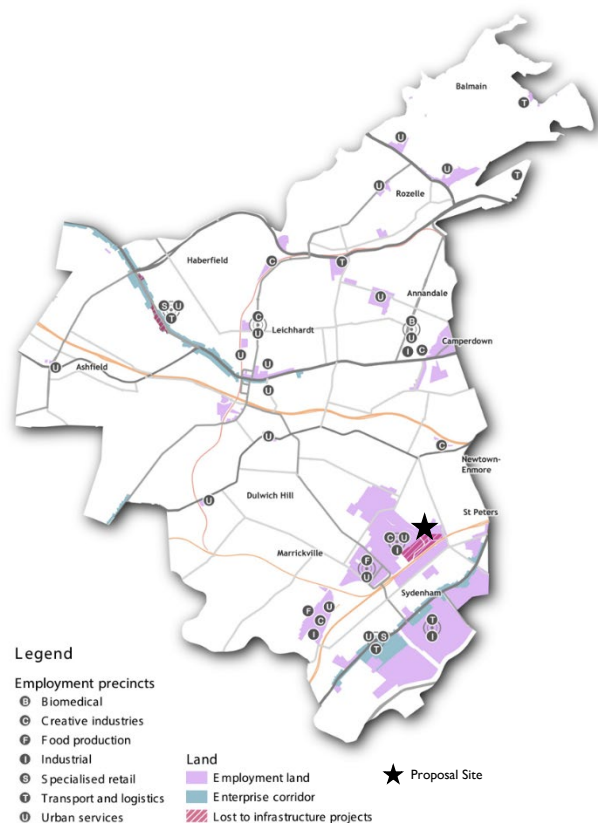


Figure 5 - Excerpt from EaRLS identifying Key Employment Lands

Question 2.

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

A Planning Proposal is the appropriate pathway to amend development standards to permit a more intense use of the land for self-storage purposes.

The only other means of achieving the proposal would be through a clause 4.6 variation of the FSR development standard. This would represent an over 200% variation. Due to the extent of the variation, a Planning Proposal to amend the development standard is required.

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Question 3.

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)? Consistency with relevant strategies is demonstrated below:

Greater Sydney Region Plan - A Metropolis of Three Cities

Direction 1: A city supported by infrastructure

Objective 1: Infrastructure supports the three cities

Consistent

The Proposal seeks to intensify self-storage uses which will support the growing population and businesses in the local area, particularly within a 5km radius as depicted in Economic Strategic Positioning Paper (Appendix F).

Objective 2: Infrastructure aligns with forecast growth – growth infrastructure pact

Not applicable

Objective 3: Infrastructure adapts to meet future needs

Not applicable

Objective 4: Infrastructure use is optimised

Not applicable

Direction 2: A collaborative city

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

Not applicable

Direction 3: A city for people

Objective 6: Services and infrastructure meet communities' changing needs

Not applicable

Objective 7: Communities are healthy, resilient and socially connected

Not applicable

Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods

Not applicable

Objective 9: Greater Sydney celebrates the arts and supports creative industries and innovation

Not applicable

Direction 4: Housing the city

Objective 10: Greater housing supply

Not applicable

Objective 11: Housing is more diverse and affordable

Not applicable

Direction 5: A city of great places

Objective 12: Great places that bring people together

Not applicable

Objective 13: Environmental heritage is identified, conserved, and enhanced

Not applicable

Direction 6: A well-connected city

Objective 14: *A Metropolis of Three Cities* – integrated land use and transport creates walkable and 30-minute cities

Not applicable

Objective 15: The Eastern, GPOP, and Western Economic Corridors are better connected and more competitive

Consistent

The site is in the Marrickville industrial precinct. It provides essential urban services that support specialised economic activities. It is located close to Sydney Airport and Port Botany which are identified as major asset and trade gateways within the Eastern Economic Corridor. The Planning Proposal seeks to deliver additional employment floorspace which can support the ongoing viability of businesses which service and require access to these trade gateways.

Whilst storage premises are not job intensive, the use is critical in supporting a range of industrial and commercial activities in the area due to shortfalls of on-site storage given the commonly small size of Inner West tenancies.

Objective 16: Freight and logistics network is competitive and efficient

Consistent

The proposal will support this objective by retaining and intensifying industrial land for port, intermodal and logistics uses from the encroachment of commercial, residential and other non-compatible uses which would adversely affect industry viability to facilitate ongoing operation and long-term growth.

Objective 17: Regional connectivity is enhanced

Not applicable

Direction 7: Jobs and skills for the city

Objective 18: Harbour CBD is stronger and more competitive

Consistent - same as Objective 15

Objective 19: Greater Parramatta is stronger and better connected

Not applicable

Objective 20: Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City

Not applicable

Objective 21: Internationally competitive health, education, research and innovation precincts

Not applicable

Objective 22: Investment and business activity in centres

Not applicable

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

Consistent

The proposal seeks to retain the existing E4 - General Industrial zone and increase the maximum FSR to facilitate the expansion of existing industrial land. It will support the growing demand for storage floor space close to Sydney Airport, Port Botany and the Sydney CBD, and time sensitive / last mile distribution across the eastern and south-eastern suburbs of Sydney.

Objective 24: Economic sectors are targeted for success.

Not applicable

Direction 8: A city in its landscape

Objective 25: The coast and waterways are protected and healthier.

Not applicable

Objective 26: A cool and green parkland city in the South Creek corridor.

Not applicable

Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced.

Not applicable

Objective 28: Scenic and cultural landscapes are protected.

Not applicable

Objective 29: Environmental, social and economic values in rural areas are maintained and enhanced

Not applicable

Objective 30: Urban tree canopy cover is increased

Consistent

This proposal will provide opportunities for on-site landscaping and tree canopy cover as it will stipulate a minimum requirement of 7.5% of the site to be provided as deep soil planting in the LEP, or 15% in the event that more than 25% of the existing warehouse building is removed. The supporting concept plan includes 7.5% area along the Murray Street frontage as landscaping which will contribute to the tree canopy cover in this industrial precinct which is a very high urban vulnerability index due to the heat island effect.

[NSW Greener Neighbourhoods Guide \(2021\)](#) sets a tree canopy target of 25% and deep soil target of 15% deep soil area on industrial sites. The proponent has explored options to provide 15% deep soil and justified that any landscaping coverage above 7.5% would impact the servicing and function of the existing storage facility and viability of the business. As the existing site does not contain any trees or deep soil, the proposed 7.5% (534sqm) of deep soil area has a positive impact for the site.

A site specific LEP Clause for a tree canopy target will not be included, tree canopy cover will be assessed at the Development Application stage in accordance with the DCP.

Refer to Part 3 Section Question 9(A) *Landscaping* for full discussion.

Objective 31: Public open space is accessible, protected and enhanced.

Not applicable

Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths

Not applicable

It is noted that the Planning Proposal acknowledges the future cycling facility on the opposite on Edinburgh Road which is likely to be installed with redevelopment of the site opposite to the subject site. It is currently owned by Sydney Metro. Council will seek a wider path on the Sydney Metro site along Edinburgh Road to provide a shared path or path and cycleway.

Direction 9: An efficient city

Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change

Consistent

Objective 34: Energy and water flows are captured, used and re-used.

Not applicable

Objective 35: More waste is re-used and recycled to support the development of a circular economy.

Not applicable

Direction 9: A resilient city

Objective 36: People and places adapt to climate change and future shocks and stresses

Consistent

Objective 37: Exposure to natural and urban hazards is reduced

Consistent

The site is located within a flood planning area. Council's Flooding Engineers have advised that flooding risk could be addressed through design changes to achieve the relevant flood planning levels and the use of flood gates for the existing ground level floor space. This will be dealt with at the development application stage.

Objective 38: Heatwaves and extreme heat are managed

Consistent

The proposal is consistent with the objective to manage heatwaves and extreme heat. The supporting concept plan includes 7.5% area dedicated to deep soil planting which will mitigate urban heat island effect.

Further measures to mitigate heat including roof and façade treatments and green infrastructure will be considered at the DA stage.

Refer to Part 3 Section Question 9(A) *Landscaping* for full discussion.

Direction 7: Implementation

Objective 39: A collaborative approach to city planning

Not applicable.

Objective 40: Plans refined by monitoring and reporting

Not applicable

The Six Cities Region Plan

Direction 1: An embedded First Nations Voice

Not applicable

Direction 2: A connected Six Cities Region

Not applicable

Direction 3: Housing supply, diversity and affordability

Not applicable

Direction 4: Inclusive places linked to Infrastructure

Not applicable

Direction 5: Powering local jobs and economies

Consistent

The Planning Proposal is consistent with this direction as it seeks to intensify employment uses, specifically for self-storage which can provide additional support for existing and new businesses in the area.

Direction 6: Climate-resilient green cities

Consistent

The Planning Proposal addresses how urban heat island effect will be mitigated through the provision of 7.5% deep soil planting, or 15% in the event that more than 25% of the existing warehouse building on site is removed.

The concept plan submitted with the Planning Proposal seeks to limit demolition of the existing warehouse on site. Making use of existing structures is the most sustainable construction method.

The Proponent has acknowledged the advice given by Council's Urban Sustainability Team stating that details such as green walls, facades and green roofs will be further considered through the detailed design at the DA Stage.

Flooding is an issue highlighted in this direction to achieve a resilient city. While the site is located on flood prone land, Council's Flooding Engineers have advised that the relevant flood planning levels can be achieved at the development application stage, with raising levels on the ground floor, lifting retail goods off the ground and above the flood planning level and using flood barriers to protect the existing warehouse floor space.

Eastern City District Plan

Direction 1: A city supported by infrastructure

E1: Planning for a city supported by infrastructure
Not applicable

Direction 2: A collaborative city

E2: Working through collaboration
Not applicable

Direction 3: A city for people

E3: Providing services and social infrastructure to meet people's changing needs
Consistent

The proposal seeks to intensify self-storage uses which will support the growing demand for storage. The Strategic Positioning Paper (Appendix – F) identifies a high demand for self-storage in the local market. The current facility on site has a 95% occupancy rate, 9.7% higher than the average Sydney self-storage occupancy rate of 83%.

The paper forecasts that demand for self-storage within a 5km radius of the facility will increase from 150,000sqm to 225,000sqm by 2037.

Without further growth in available self-storage facility floor space, demand is expected to significantly outstrip supply, stymieing sectors and businesses that rely on self-storage as well as driving up prices for self-storage.

E4: Fostering healthy, creativity, culturally rich and socially connected communities
Not applicable

Direction 4: Housing the city

E5: Providing housing supply, choice, and affordability with access to jobs, services and public transport
Not applicable

Direction 5: A city of great places

E6: Creating and renewing great places and local centres and respecting the District's heritage.
Not applicable

Direction 6: A well connected city

E10: Delivering integrated land use and transport planning and a 30-minute city
Not applicable

Direction 7: Jobs and skills for the city

E7: Growing a stronger and more competitive Harbour CBD

Consistent

The Planning Proposal states the following:

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

This is considered to be satisfactory including that:

- Marrickville is identified in the Eastern City District Plan as an “important industrial area.” Additional industrial floorspace in the area will unlock further economic growth in the region and have positive knock on- effects for other businesses and industries that rely on self-storage.
- The proposal partially achieves Action 25 “*review as required, planning controls to facilitate economic activity to deliver on the job targets.*”

E8: Growing and investing in health and education precincts and the Innovation Corridor

Not applicable

E9: Growing international trade gateways

Not applicable

E11: Growing investment, business opportunities and jobs in strategic centres

Not applicable

E12: Retaining and managing industrial and urban services land

Consistent

The Planning Proposal states the following:

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

This is considered to be satisfactory including the following:

- The proposal strengthens the viability and protection of industrial land by increasing the density of industrial floorspace.
- The proposal partially achieves a key action of the EaRLS to increase the floorspace allowance of industrial sites. This strategy was developed under the “retain and manage principle” of this objective.

E13: Supporting growth of targeted industry sectors

Consistent

The Planning Proposal states the following:

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

This is satisfactory including the following:

- Multiple industrial and commercial businesses, including many home industries rely on self-storage to facilitate their businesses. Increase the supply of this use will unlock growth for businesses and investment in the area.

Direction 8: A city in its landscape

E14: Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways

Not applicable

E15: Protecting and enhancing bushland and biodiversity.

Not applicable

E16: Protecting and enhancing scenic and cultural landscapes

Not applicable

E17: Increasing urban tree canopy cover and delivering Green Grid connections

Consistent

The Planning Proposal includes landscaping on site through the provision of 7.5% deep soil area along the western boundary which will contribute to tree canopy cover. The Marrickville DCP 2011 sets an onsite tree canopy target of 25% for industrial sites. Tree canopy cover will be assessed at the DA stage.

Refer to Part 3 Section Question 9(A) *Landscaping* for full discussion.

E18: Delivering high quality open space

Not applicable

Direction 9: An efficient city

E19: Reducing carbon emissions and managing energy, water and waste efficiently.

Consistent

The concept plan submitted with the Planning Proposal seeks to limit demolition of the existing warehouse on site. Making use of existing structures is the most sustainable construction method. Further measures can be considered at the DA stage.

Direction 10: A resilient city

E20: Adapting to the impacts of urban and natural hazards and climate change.

Consistent – as per above.

Industrial Lands ‘Retain and Manage’ Policy Review – Review Findings Paper (2023)

Draft Guiding Principle 1. Securing capacity of industrial and urban services land

Consistent

The Planning Proposal seeks to retain the existing E4 - General Industrial zoning. Existing uses can continue on the site. The FSR intensification for self-storage uses will increase the capacity for urban services.

Draft Guiding Principle 2. Supporting sustainability Policy and aspirations

Consistent

Whilst the Planning Proposal aligns with the government objectives to increase urban services land and optimise the freight and logistics network, it does not appropriately address this principle to minimise environmental impacts.

Draft Guiding Principle 3. Optimising diverse supply chains supported by infrastructure

Consistent

The additional self-storage uses will be able to support existing and new businesses in the area that are in highly accessible locations, supporting an efficient and resilient freight network.

Draft Guiding Principle 4. Boosting economic activity to support current and emerging industries

Consistent

The proposal will facilitate additional self-storage uses to support current and emerging industries the area, contributing to securing current and future economic growth.

Draft Guiding Principle 5. Encouraging innovation

Consistent

This is a unique proposal to intensify the industrial uses on the site to meet the evolving needs of future users. Industrial lands in Greater Sydney are under threat from other competitive uses such as residential and commercial. This proposal sets a precedent to optimise the use of existing industrial lands and adapt to the changing needs of businesses and emerging industries.

Draft Guiding Principle 6. Providing business certainty

Consistent

The Planning Proposal through its increased floor space will provide certainty to the existing and future businesses in the Marrickville industrial area.

Draft Guiding Principle 7. Servicing population needs

Consistent

The proposal seeks to provide additional self-storage to service residents and businesses which is in increasing demand.

Draft Guiding Principle 8. Consideration of transition to alternative uses

Not applicable as the proposal will retain the existing permissible uses.

Future Transport Strategy 2056

Consistent

The Future Transport Strategy is underpinned by 14 strategic directions. Outcomes relevant to this proposal are:

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

The proposal aligns with the Future Transport Strategy as it supports integrated land use and transport planning by providing additional employment land along an existing freight network route whilst also supporting urban services in close proximity to higher-density development and employment around a public transport node.

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Question 4.

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

Theme 1. An Ecologically Sustainable Inner West

Planning Priority 1: Adapt to climate change

Consistent

The proposal has demonstrated an ability to be able to adapt to flooding and urban heat. Further consideration is to be undertaken at the DA stage.

Planning Priority 2: Inner West is a zero emissions community

Not applicable

Planning Priority 3: A diverse and increasing urban forest that connects habitats of flora and fauna

Consistent

The Proposal seeks to provide 7.5% (534 m²) deep soil planting. While the NSW Greener Neighbourhoods Guide aims to achieve a minimum of 15% deep soil, as previously stated, the proponent has demonstrated to Council that a deep soil coverage above 7.5% is adequate in the local context and to ensure the development remains feasible and serviceable. Provision of planting along Murray Street frontage will provide opportunities for biodiversity.

Refer to Part 3 Section Question 9(A) *Landscaping* for full discussion.

Council notes that the concept plans identify three trees for removal. Planning Proposal pathway does not give approval to remove trees this would be determined at the DA Stage.

Planning Priority 4: Inner West is a water sensitive city with clean waterways

Not applicable

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

Consistent

Theme 2. Unique, liveable, networked neighbourhoods

Planning Priority 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

Not applicable

Planning Priority 7: Provide for a rich diversity of functional, safe and enjoyable urban spaces connected with and enhanced by their surroundings

Not applicable

Theme 3. Sustainable Transport

Planning Priority 8: Provide improved and accessible sustainable transport infrastructure

Not applicable

Theme 4. Creative Communities and a Strong Economy

Planning Priority 9: A thriving local economy

Consistent as per the following statement in the Planning Proposal: *“The proposed plan amendment does not seek any change to the existing E4 General industrial land use zoning. The proposed FSR uplift will facilitate the delivery of additional industrial floor space to support the retention and management of industrial zoned land which will support the successful operation of other local businesses which are also operating to achieve this planning priority.”*

Theme 5. Caring, happy, healthy communities

Planning Priority 10: Recognise and sustain Aboriginal and Torres Strait Islander cultures and histories

Not applicable

Planning Priority 11: Provide accessible facilities and spaces that support active, healthy communities

Not applicable

Theme 6. Progressive Local leadership

Planning Priority 12: Inner West involves and listens to the community

Not applicable

Planning Priority 13: Develop diverse and strong stakeholder relationships through collaboration with government, community and business to deliver positive planning outcomes and realise the benefits of growth

Consistent – the proponent has engaged with Council throughout the pre-lodgement and planning proposal stages. Further engagement with other government agencies, business and community will be carried out at the public exhibition stage.

Planning Priority 14: Deliver visionary long-term planning and responsible decision making reflective our Community strategic plan

Not applicable

Inner West Housing Strategy

Not applicable – Housing is not relevant to this proposal.

Community Strategic Plan – June 2022

Strategic Direction 1: An ecologically sustainable Inner West

Consistent

The Planning Proposal is consistent with this direction to increase tree canopy coverage. The proposal seeks to provide 7.5% deep soil planting which can contribute to increasing tree canopy.

The concept plan submitted with the Planning Proposal seeks to limit demolition of the existing warehouse on site. Making use of existing structures is the most sustainable construction method.

The proponent has acknowledged the advice given by Council's Urban Sustainability Team stating that details such as green walls, facades and green roofs will be further considered through the detailed design at the DA Stage.

Strategic Direction 2: Liveable, connected places and transport

Not applicable

Strategic Direction 3: Creative communities and a strong economy

Consistent

The Planning Proposal achieves this Strategic Direction particularly Outcome 3.3 *The local economy is thriving* as it seeks to intensify urban services which will provide the needed storage space for existing and emerging businesses. Additionally, the retention of the existing E4 - General Industrial zone ensures the protection of employment land, aligning with the Inner West Employment and Retail Lands Strategy.

Strategic Direction 4: Healthy, resilient and caring communities

Not applicable

Strategic Direction 5: Progressive, responsive and effective civic leadership

Not applicable

Employment and Retail Lands Strategy 2021

Principle 1: Centres are distinctive and productive

Consistent

The Planning Proposal partially achieves Strategy 1.6 *Diversify business activity* by delivering additional self-storage space which has capabilities to support the growth of existing and emerging local businesses.

Principle 2: Industrial and urban services lands are protected and managed

Consistent

The Planning Proposal retains the existing E4 - General Industrial zone which aligns with Strategy 2.2 *Protect employment lands from being eroded by conflicting and incompatible uses* and Strategy 2.3. The proposal looks to increase employment floor space. More specifically, the proposal will intensify self-storage space that already exists on site, which there is a demonstrated demand for. This is outlined in the Economic Strategic Positioning Paper (Appendix F).

Principle 3: Spaces for business are suitable and available

Consistent

The Planning Proposal seeks to intensify floor space for a self-storage use, a land use with demonstrated demand in the local area and Greater Sydney. Self-storage facilities can also act as small warehouses and storage for a range of small to medium businesses, unlocking specialised spaces for businesses to establish and grow.

Principle 4: The planning framework is clear

Consistent

The Planning Proposal aligns with Strategy 4.2 *Manage land use conflicts between employment and residential uses* since the existing E4 - General Industrial zone is being retained and no additional land uses are being introduced.

Our Place Inner West: Going Places – Integrated Transport Strategy

The Integrated Transport Strategy is underpinned by 7 principles. The most relevant and demonstrated by this proposal are:

- Principle 1: Plan Land Use
The Planning Proposal seeks to provide additional self storage space close to public transport – St Peters and Sydenham Railway Stations. Additionally, the introduction of the future bike link connection along Sydney Steel Road and Edinburgh Road will provide active and sustainable transport options to access the site.
- Principle 6: Freight and Deliveries
The intensification of storage floorspace may be used by time sensitive and last mile distribution services. The site is located close to existing key freight routes including Princes Highway and the WestConnex St Peters Interchange.

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Question 5.

Is the planning proposal consistent with any other applicable State or regional studies or strategies?

As discussed under Question 1

Question 6.

Is the Planning Proposal consistent with applicable SEPPs?

SEPP (Housing) 2021

Consistent

The Planning Proposal does not contain provisions that contradict or would hinder the application of this SEPP.

SEPP (Primary Production) 2021

Consistent

The Planning Proposal does not contain provisions that contradict or would hinder the application of this SEPP.

SEPP (Resources and Energy) 2021

Not applicable

SEPP (Resilience and Hazards) 2021

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Consistent

The site is zoned E4 - General Industrial and is in an established industrial precinct. Clause 4.6 of the SEPP states that a consent authority must not consent to development unless it has considered whether the land is contaminated and if required, it is satisfied that the land will be remediated before the land is used for that purpose.

As there are no changes to the permissible land uses proposed, contamination requirements can be addressed at the development application stage.

SEPP (Industry and Employment) 2021

Consistent

Advertising and signage structures will need to be assessed against the relevant clauses of this SEPP at the development application stage.

SEPP (Transport and Infrastructure) 2021

Consistent - The Planning Proposal does not contain provisions that contradict or would hinder the application of this SEPP.

SEPP (Biodiversity and Conservation) 2021

Not applicable

SEPP (Planning Systems) 2021

Consistent - The Planning Proposal does not contain provisions that contradict or would hinder the application of this SEPP.

SEPP (Precincts – Eastern Harbour City) 2021

Not applicable

SEPP (Precincts – Central River City) 2021

Not applicable

SEPP (Precincts – Parkland City) 2021

Not applicable

SEPP (Precincts – Regional) 2021

Not applicable

SEPP (Exempt and Complying Codes) 2008

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Consistent - Part 5A of the Codes SEPP sets the complying development parameters for industrial buildings. Approval of an industrial building through complying development may be possible through the Codes SEPP.

SEPP (Building Sustainability Index: BASIX) 2004

Not applicable

SEPP (Sustainable Building) 2023

Consistent

The Planning Proposal does not contain provisions that contradict or would hinder the application of this SEPP.

SEPP No 65 – Design Quality of Residential Apartment Development

Not applicable

Section B – Relationship to the strategic planning framework

Question 7.

Is the Planning Proposal consistent with applicable Local Planning Directions (Section 9.1 Directions)

FOCUS AREA 1 PLANNING SYSTEMS

Direction 1.1 Implementation of Regional Plans

Consistent

The Planning Proposal will give effect to the Greater Sydney Region Plan and the Eastern City District Plan. It is generally consistent with the planning principles, directions and priorities contained in the Region Plan as assessed in Part 3, Section B, Question 3 in this report. A relevant objective from these plans includes creating connected and competitive economic corridors and ensuring that industrial land is planned, retained and managed.

Direction 1.2 Development of Aboriginal land Council land

Not applicable

Direction 1.3 Approval and referral requirements

Not applicable

Direction 1.4 Site specific provisions

Consistent

The proposal intends to introduce a new site-specific LEP provision to allow an increased FSR for self-storage uses.

The proposal does not seek changes to permissible land uses or existing E4 - General Industrial zone. It is also not considered to be more restrictive, as it allows additional FSR for the self-storage land use, which is currently permissible.

It is also worth noting that use of a site-specific provision is an intentional pathway to alleviate concerns relating to potential environmental and traffic impacts. If a blanket uplift of up to FSR of 3.2:1 was permitted, there may be a number of adverse environmental impacts such as traffic associated with intensification of the range of permissible land uses under the E4 – General Industrial zone.

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Direction 1.4A Exclusion of Development Standards from Variation
Consistent

The proposal does not seek to exclude application of Clause 4.6 of the IWLEP 2022.

FOCUS AREA 1 PLANNING SYSTEMS – PLACE BASED

Direction 1.5 Parramatta Road Corridor Urban Transformation Strategy
Not applicable

Direction 1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan
Not applicable

Direction 1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan
Not applicable

Direction 1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan
Not applicable

Direction 1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor
Not applicable

Direction 1.10 Implementation of the Western Sydney Aerotropolis Plan
Not applicable

Direction 1.11 Implementation of Bayside West Precincts 2036 Plan
Not applicable

Direction 1.12 Implementation of Planning Principles for the Cooks Cove Precinct
Not applicable

Direction 1.13 Implementation of St Leonards and Crows Nest 2036 Plan
Not applicable

Direction 1.14 Implementation of Greater Macarthur 2040
Not applicable

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Direction 1.15 Implementation of the Pyrmont Peninsula Place Strategy

Not applicable

Direction 1.16 North West Rail Link Corridor Strategy

Not applicable

Direction 1.17 Implementation of the Bays West Place Strategy

Not applicable

Direction 1.18 Implementation of the Macquarie Park Innovation Precinct

Not applicable

Direction 1.19 Implementation of the Westmead Place Strategy

Not applicable

Direction 1.20 Implementation of the Camellia-Rosehill Place Strategy

Not applicable

Direction 1.21 Implementation of South West Growth Area Structure Plan

Not applicable

Direction 1.22 Implementation of the Cherrybrook Station Place Strategy

Not applicable

FOCUS AREA 2: Design and Place - Blank

FOCUS AREA 3 – BIODIVERSITY AND CONSERVATION

Direction 3.1 Conservation Zones

Not applicable

Direction 3.2 Heritage Conservation

Not applicable – the site is not directly affected by heritage items or heritage conservation areas; however, it is in the vicinity of heritage items. Any heritage impacts associated with the development should be addressed at the detailed design stage.

Direction 3.3 Sydney Drinking Water Catchments

Not applicable

Direction 3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs

Not applicable

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section B – Relationship to the strategic planning framework

Direction 3.5 Recreation Vehicle Areas

Not applicable

Direction 3.6 Strategic Conservation Planning

Not applicable

Direction 3.7 Public Bushland

Not applicable

Direction 3.8 Willandra Lakes Region

Not applicable

Direction 3.9 Sydney Harbour Foreshores and Waterways Area

Not applicable

Direction 3.10 Water Catchment Protection

Not applicable

FOCUS AREA 4: RESILIENCE AND HAZARDS

Direction 4.1 Flooding

Consistent

A Flood Assessment Report has been provided by HydroStorm Consulting (Appendix – D) dated 31 October 2024 which addresses relevant clauses (3)(a)-(h), Council's Flood Management requirements and the NSW Floodplain Development Manual. The report recommends the following:

- The floor levels of the proposed development comply with the required Flood Planning Level (FPL).
- The loss of flood storage is compensated through provision of compensatory storage of equal magnitude onsite. This is likely to mitigate any adverse impacts due to the development. However, this would be confirmed at the detailed design stage.
- Raising the entry to the existing warehouse/building and provision of flood gate at the entrance to the existing building would lower the flood risk to that building.

Further Council's Engineers have reviewed the concept plan and flood study and recommended that a detailed flood assessment will be required at the development application stage. Modifications will be required to the development plans at the development application stage to comply with the relevant FPLs.

Section B – Relationship to the strategic planning framework

The Flood Risk Management Plan identifies a FPL of 5.83 which is sufficiently raised above the 1% AEP Flood Level on Edinburgh Road (5.25m AHD) and the 1% AEP flood level on Smidmore Street (5.78m AHD).

Council's Flooding Engineer's also advised the following:

- A majority of the new warehouse is provided at or above this level, however some areas are proposed below this level.
- The current levels of the entry ramp from Edinburgh Road do not provide sufficient protection to the existing warehouse and will rely on a flood barrier in events smaller than a 1% AEP event.
- Commercial parking ramps and parking spaces are allowed to provide a ramp up to 5% or 1:20. This would allow for a landing at the entry of the existing warehouse of 5.50m AHD.
- The landing should be raised to a minimum level of 5.5m AHD. A flood barrier is only supported for the prevention of water levels higher than this.
- It is noted that it would require modification to the transition ramp between the new and old warehouse components, however a compliant ramp can be provided within a length of 6m.
- Any loss of flood storage resulting from amendments to the ramps will need to be accounted for with any future submission.
- The proposed box shop is below the FPL at Edinburgh Road. There appears to be adequate ceiling height to raise floor levels in this area to minimise the frequency of flooding. The floor levels should be raised as high as practicable to reduce the recurrence of flooding and damage to stock stored in this area. Any proposal for a floor level below the FPL must be supported by a suitably detailed flood risk management plan.
- The Wine Storage is located below the FPL and is susceptible to the entry of flood waters. A minor shop front could be considered at street level for the Wine Ark Office only, subject to all temporary holding areas and medium to long-term storage being provided at or above the FPL of 5.8m AHD.

The above issues can be addressed through modifications of the architectural plans at the development application stage.

Direction 4.2 Coastal Management

Not applicable

Section B – Relationship to the strategic planning framework

Direction 4.3 Planning for Bushfire Protection

Not applicable – The Site is not identified as bushfire prone land.

Direction 4.4 Remediation of Contaminated Land

Consistent

This Planning Proposal does not seek to change the E4 - General Industrial zone or the use of the site as a self-storage. Therefore, it is considered that the site is suitable for its intended use.

Direction 4.5 Acid Sulfate Soils

Consistent

The site is classified as Acid Sulfate Soils (ASS) Class 2 under the IWLEP 2022. Class 2 risk designates that any works undertaken below the natural ground surface or by which the water table is likely to be lowered, will require an Acid Sulfate Soils Management Plan (ASSMP) or a preliminary assessment as per ASSMAC (1998) prior to development consent.

The proposal satisfies the consistency clause (a) as it includes an Acid Sulfate Soils Assessment (Appendix – E) prepared by Martens Consulting Engineers dated June 2022. The report concludes that the site's soils do not require an ASSMP prior to development consent. Further detailed investigation will be undertaken at the development application stage when the extent of soil disturbance is known.

Direction 4.6 Mine Subsidence and Unstable Land

Not applicable

FOCUS AREA 5 – TRANSPORT AND INFRASTRUCTURE

Direction 5.1 Integrating Land Use and Transport

Section B – Relationship to the strategic planning framework

Consistent

The site is located in proximity to public transport (Sydenham and St Peter's Train Stations and local buses) providing access to jobs and services while reducing private car use.

The proposal will support the efficient movement of freight by providing storage space for businesses in a location accessible to the regional road network and a wide Greater Sydney delivery catchment.

The additional industrial floorspace and complementary land use activities will provide for increased access to employment opportunities and business services within the Inner West LGA.

Direction 5.2 Reserving Land for Public Purposes

Not applicable

Direction 5.3 Development Near Regulated Airports and Defence Airfields

Consistent

The site is located approximately 2km from Sydney Airport. The industrial land use is compatible with current and future airport operations. As the proposal is not seeking to rezone the land, intensification is acceptable and will not impact on the effective and safe operation of the airport. Consultation will be undertaken with Sydney Airport at the public exhibition stage.

The proposal will have to satisfy the Obstacle Limitation Surface (OLS) requirements relating to maximum building height at the detailed design stage.

Direction 5.4 Shooting Ranges

Not applicable

FOCUS AREA 6 - HOUSING

Direction 6.1 Residential zones

Not applicable

Direction 6.2 Caravan parks and manufactured home estates

Not applicable

Section B – Relationship to the strategic planning framework

FOCUS AREA 7: INDUSTRY AND EMPLOYMENT

Direction 7.1 Employment Zones

Consistent

The Planning Proposal retains the E4 - General zone and seeks to increase the FSR for self-storage uses. This aligns with objectives (a) and (b).

The proposed amendment to increase the maximum FSR will facilitate the retention and optimise the use of existing industrial land within the Eastern Harbour City to support the growing demand for additional industrial floor space and storage close to Marrickville, Sydney Airport, Port Botany, and the Sydney CBD. In accordance with the Direction, the proposal will:

- Support employment growth in a suitable location, providing increased job opportunities highly accessible by public transport,
- Protect employment land in the employment zone by facilitating the long-term viable operation of the site, and
- Support the viability of the Marrickville centre by ensuring the long-term viability of the existing industrial site through provision of self-storage floor space to support businesses and residents to meet market demand.

Direction 7.2 Reduction in non-hosted short-term rental accommodation period

Not applicable

Direction 7.3 Commercial and Retail Development along the Pacific Highway, North Coast

Not applicable

FOCUS AREA 8: RESOURCES AND ENERGY – NA

Direction 8.1 Mining, Petroleum Production and Extractive Industries

Not applicable

FOCUS AREA 9: PRIMARY PRODUCTION

Direction 9.1 Rural zones (does apply)

Not applicable

Direction 9.2 Rural lands, and

Not applicable

Section B – Relationship to the strategic planning framework

Direction 9.3 Oyster Aquaculture

Not applicable

Direction 9.4 Farmland of State and Regional Significance on the NSW Far North Coast

Not applicable

SITE SPECIFIC MERIT

Does the proposal give regard and assess impacts to the following:

- A) the natural environment on the site to which the proposal relates and other affected land (including known significant environmental areas, resources or hazards)

Consistent

The site is affected by overland flood and Acid Sulfate Soils (ASS). Detailed assessment is provided under the Local Planning Directions in Part 3 Section B Question 7 of this report (page 39 and 42 for flooding and ASSs respectively).

- B) existing uses, approved uses, and likely future uses of land in the vicinity of the land to which the proposal relates

Consistent

- C) 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

Consistent

The proposal will have no major infrastructure impacts as the increased FSR limit applies to the self-storage use only.

A Preliminary Traffic Impact Assessment Traffic (Appendix C) submitted determines that an increase in FSR would result in a slight increase in traffic generation and have insignificant implications on the surrounding road network.

The Planning Proposal will not significantly increase demand for infrastructure. The site is connected to water, power, sewer and gas. Any upgrades required to existing services will be identified during the detailed development application stage.

Section B – Relationship to the strategic planning framework

Section C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

Question 8.

Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or habitats, will be adversely affected because of the proposals?

- A) Identify if the land subject to the proposal has the potential to contain critical habitat or threatened species, populations or ecological communities, or their habitats

The site is currently completely built out by either an existing building or hardstand area. It is not identified as an area with potential to contain a threatened species, population, ecological community, or habitat.

- B) If yes, undertake studies that are necessary to confirm the presence of these species or habitats and their significance. An assessment of its significance and/or consultation should place to inform the Gateway determination

Not applicable

- C) Mapping may be provided in the proposal to identify known vegetation communities located within or near the site

Not applicable

- D) An assessment of significance in accordance with Part 7A of the Fisheries Management Act 1994 and the 'Threatened Species Assessment Guidelines', may be required prior to Gateway determination

Not applicable

- E) Identify any approvals required under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) and Biodiversity Conservation Act 2016

Not applicable

- F) Any adverse impacts will trigger the requirement for the PPA to consult on the planning proposal with relevant authorities and government agencies

Not applicable

OVERALL COMMENT

The Planning Proposal is highly unlikely to adversely affect any critical habitat or threatened species, populations or ecological communities or their habitats. The proposal is within an established industrial precinct. The site does not contain any vegetation. Street trees are located along the three street frontages.

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

Question 9.

Are there any other likely environment effects of the planning proposal and how are they proposed to be managed?

- A) Environmental effects unique to a planning proposal may not be addressed in the strategic planning framework. These matters may be identified in informal guidelines, codes or policies prepared by other public authorities and government agencies. Environmental effects may include natural hazards such as flooding, land slip, bushfire hazard, etc

Landscaping

As shown below in Figure 6, from Australian Bureau of Statistics 2016 the site is identified to have a Heat Vulnerability Index (HVI) of 4 out of 5. Such areas are deemed to be most vulnerable to the adverse effects of urban heat.

The [Inner West's Tree Management DCP](#) has a tree canopy target of 25% for industrial land. Additionally, [NSW Greener Neighbourhoods Guide \(2021\)](#) sets a tree canopy target of 25% and deep soil target of 15% deep soil area on industrial sites.

The proposal includes site-specific provision requiring 7.5% of the site for deep soil which can contribute to an increased tree canopy and help mitigate urban heat island effect. accordance with Council's tree management controls in the DCP, a canopy target of 25% is required for industrial land. The proposal includes site-specific provision requiring 7.5% of the site for deep soil which can contribute to an increased tree canopy and help mitigate urban heat island effect.

The proposal includes the following justifications for the reduced provision of 7.5% deep soil planting:

- The NSW Greener Neighbourhood Guide target of 15% is aspirational. The site currently has no deep soil or tree canopy.
- Retaining the existing warehouse on site is crucial to the viability of the project.

- Partial removal of the existing warehouse is the only means to achieve deep soil landscaping. Any further demolition of the existing warehouse will require significant structural and NCC related upgrades to the building that will render the project unfeasible.

Further, the Proponent has explored options to provide 15% deep soil and has demonstrated that any landscaping coverage above 7.5% would not be feasible on the site as it would:

- impact the servicing and function of the existing storage facility and viability of the business (proponent intends to retain the existing warehouse building on the site)
- require redesign due to the roof structure
- impact the building fire safety requirements.
- potentially worsen flooding on the site

The concept architectural drawings indicate an approximate 534sqm of deep soil area (7.5m x 67.1m) deep soil area located along the Murray Street boundary.

The proposed landscaping is located along a frontage that adds value to the public domain and streetscape. Due to the constraints on the site and proponent's stance for major retention of the existing warehouse, 15% would not be achievable.

The proposed deep soil provision is generally considered acceptable in this circumstance as:

- Significant consideration has gone into options testing for a range of deep soil outcomes with the proposed arrangement delivering the best outcome. This includes substantial modifications to the proposal since the original 2023 submission which provided zero deep-soil planting.
- Contextually, this will be a generous onsite deep soil provision.
- If undertaken in line with the concept plan, locating the deep soil continuously along the Murray Street frontage will have a positive contribution to the public domain and allow for the planting of a meaningful tree canopy.
- It's acknowledged that retention of the existing warehouse is preferred urban design outcome and supports the feasibility of the project.
- Inclusion of site-specific target of deep soil planting in the LEP will provide certainty regarding the delivery of this deep soil planting and landscaping at the development application stage.
- A review of recently approved developments applications for industrial sites throughout Marrickville indicates that new

developments are usually providing deep soil at or below 5% of the site area.

IWLPP have recommended that the proposal should provide up to 15% deep soil planting in accordance with the Greener Neighbourhoods Guide. While in principle Council officers support increased provision of deep soil planting on this site, and in the wider precinct, it is impractical to achieve the 15% deep soil planting on the site unless the existing warehouse is demolished. Through discussions with the proponent, it has been established that demolishing the existing warehouse has major operational impacts and it would substantially affect the viability of the project.

Consequently, it is recommended that the site-specific provision regarding the provision of deep soil planting be amended in the Planning Proposal to:

- provide 7.5% deep soil planting if the existing warehouse is largely retained on the site; or
- provide 15% deep soil planting if more than 25% of the existing warehouse building is removed.

This approach allows opportunities for additional deep soil planting in the instance if the existing warehouse is demolished in the future. The current provision of minimum 7.5% deep soil planting and retaining the existing warehouse is also considered acceptable as it would increase the supply of urban services land while maintaining the project to be viable for the proponent. Considering the significant uplift and IWLPP advice, Council recommends that an LEP clause be included that requires 15% deep soil area if more than 25% of the original warehouse building at 11 Edinburgh Road is removed.

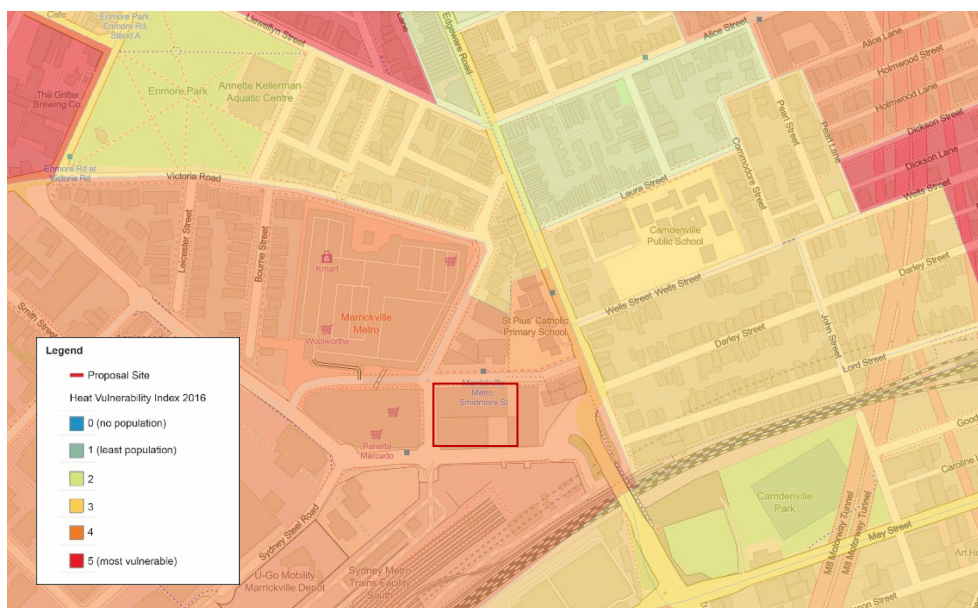


Figure 6 - Heat Vulnerability Index (NSW SEED, 2016)

Sydney Airport Obstacle Limitation Surface Level (OLS)

Located close to Sydney Airport, the site is subject to an OLS of 51m AHD. The proposed height of building is 30m (RL34.53) which is within the OLS.

A referral to Sydney Airport and the Civil Aviation and Safety Authority (CASA) was made during the pre-lodgement phase. Sydney Airport did not reply to Inner West's Council's request. CASA replied with the following statement:

"CASA has no objection to the proposal on condition that the finalised developed height does not infringe the Prescribed Airspace for Sydney Airport as declared by the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts."

Further consultation will be undertaken with the relevant government agencies at the public exhibition stage as per the Gateway determination conditions. A referral to Sydney Airport and CASA will also be undertaken at the development application stage.

The Inner West Local Planning Panel's concerns are understood regarding the potential mismatch of FSR and height control. It is recommended that the proposed height control therefore be removed from the proposal. This is consistent with the existing approach for industrial lands in the LEP where there are no height controls, and the built form is largely governed by the FSR control.

Built form and scale

The proposed bulk and scale of the development up to 7 storeys may have some visual and amenity impacts, however given the site's location and context, the level of impact is not significant and considered acceptable. The site is in an industrial area and not directly adjoining any residential areas, so there are no major concerns regarding overshadowing or visual privacy.

Further, the built form could be refined at the development application stage by reducing the excessive use of blank walls and including high-quality materials on the building facades.

Transport and traffic

Given that the proposal relates to increasing the FSR for self-storage uses only, the potential traffic impacts are minimal. The proposal would result in a slight increase in traffic generation during peak hours and have a negligible impact on the surrounding road network.

The proposal would result in a slight increase in traffic generation during peak hours and have a negligible impact on the surrounding road network

as demonstrated in the proponent's Transport Assessment Report (Appendix C).

Concerns were raised by Council's Traffic Engineers and Transport for NSW (TfNSW) at the pre-lodgement stage regarding the potential traffic impacts of alternate permissible uses in the land use table under E4 – General Industrial zone that may result from the proposed FSR increase, namely 'hardware and building supplies'.

The proponent has since modified the Planning Proposal to limit the FSR uplift to self-storage uses only.

Council's Traffic Engineers raised concerns regarding the lack of on-site parking. The proposed concept plan does not comply with the existing DCP's car parking provisions. Compliance with the parking controls or any justification to provide reduced parking should be demonstrated at the development application stage. Any future development application must also provide adequate on-site bike parking for staff and customers.

Further, the points below must be considered at the detailed design stage:

- The proposed driveway appears to be 7m wide and it is necessary that the footpath outside the driveway reinforces pedestrian priority via surface materials, gradients, layback position, etc. in the plan.
- A stopping area to accommodate an 8.8m Medium Rigid Vehicle should be provided on the site so waiting vehicles don't block the footpath.
- Adequate visibility by drivers of people walking on the footpath should also be provided, however this simultaneously needs to avoid creating a vast vehicle entry point.
- Investigate how public and active transport access and needs would integrate with the surrounding established and potential transport network (i.e. Sydney Metro). The Practitioner's Guide to Movement and Place can be utilised to assist in guiding desired outcomes for street and road environments

Note detailed assessment of flooding and ASS issues has been completed under the Local Planning Directions in Part 3 Section B Question 7 of this report (page 39 and 42 for flooding and ASSs respectively).

B) The Planning Proposal should identify any other environmental effects and prepare information or undertake investigations to address an identified matter

None required.

C) Scope of these investigations may be identified in the Planning Proposal and may need to be undertaken to inform the Gateway determination

None required.

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

Question 10.

Has the Planning Proposal adequately addressed any social and economic effects?

A) Identify effects on items or places of non-Aboriginal or Aboriginal cultural heritage not already addressed elsewhere

The site has no identified or known items of European or Aboriginal significance. However, there are heritage listed items around the site including:

- Local Heritage Item I1742: Waugh & Josephson industrial buildings former – Inter-war functionalist workshop, including interiors, showroom and offices
- Local Heritage Item I1316: St Pius Church, Church Hall and Presbytery, including interiors
- Local Heritage Item I1286: Mill House, including interiors
- Local Heritage Item I1250: Brick

The proposal will not adversely impact these adjacent heritage items.

B) Estimate the number of jobs or housing growth (e.g. construction/post-construction and housing diversity)

The Strategic Positioning Paper (Appendix F) identifies that:

- Construction phase will provide a total of 96 jobs (39 direct, 58 indirect), and
- Post construction will provide a total of 27 jobs (15 direct, 12 indirect).

C) Identify the impact on existing social infrastructure, such as schools and hospitals

The Planning Proposal will have minimal impact on the existing social infrastructure, given the nature of proposed uses.

D) Identify the need for public open space or impacts on green infrastructure

The Planning Proposal will have minimal impact on public open space.

Section C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

E) Identify the impact on existing retail centres

The site is close to Marrickville Metro Shopping Centre and the recently approved Woolworths Customer Fulfilment Centre. It is also close to the Marrickville local centre. The proposed self-storage use will not compete with the surrounding retail centres. Retail businesses often need storage space to support their operations. Increased self-storage floor space will facilitate investment and growth in these small businesses.

F) Identify measures to mitigate any adverse social or economic impacts, where necessary, and whether additional studies are required

Not applicable

G) Identify any proposed public benefits

Council has not received any letter of offer to provide public benefits associated with the proposed uplift on this site. Notwithstanding, it is recommended that the proponent investigate opportunities to provide public benefits associated with streetscape improvements and public art to benefit the wider area.

Section D – INFRASTRUCTURE (LOCAL, STATE AND COMMONWEALTH)

Question 11.

Is there adequate public infrastructure for the Planning Proposal?

- A) Generally, this applies where the planning proposal includes development that will, or is likely to, require the provision of, or increase the demand for, public facilities and services

This Planning Proposal is not expected to significantly increase demand for infrastructure. The site is in an existing industrial precinct with good access to public transport via Sydenham and St Peters Railway Stations. It is also in proximity to road transport infrastructure including the St Peters Interchange, and the M4 and M5 Motorway. The Preliminary Traffic Assessment report concluded that the site is appropriately serviced with parking and will not significantly impact the surrounding road network.

Similarly, the proposal will not result in additional burden on existing public infrastructure such as schools, hospitals or open space given the nature of proposed uses.

- B) Address whether existing infrastructure is adequate to serve or meet the needs of the proposal and how any predicted shortfall in infrastructure provision could be met

The site is connected to water, power, sewer and gas. Any upgrades required to existing services will be identified during the detailed development application stage.

- C) Undertake studies required to identify the extent of any infrastructure shortfall, potential mechanisms or strategies to address any shortfall and which agencies have been consulted as part of that process

Not required at this stage – further analysis may be required at the Post-Gateway stage

- D) The proponent/PPA is to identify what local and regional infrastructure may be needed

The proposal should contribute towards local and regional infrastructure through local infrastructure contributions plan and housing and productivity contributions at the development application stage.

E) For Planning Proposals likely to place additional demands on public infrastructure, it is important to undertake consultation with the public authorities and government agencies responsible for the provision of that infrastructure. The Gateway determination will confirm whether a local contributions plan is required to be exhibited with the planning proposal and require regular feedback on the progress of finalizing an infrastructure strategy and high-level costs

Increased demand beyond current infrastructure capacity is not expected as a result of the Planning Proposal. Referrals to relevant agencies including Transport for NSW, Ausgrid, Sydney Water and other public authorities will be undertaken as per the Gateway determination.

F) For Planning Proposals, a local contributions plan may be required. Liaison with the council is necessary

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

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

3. Department of Planning, Industry and Environment's Guide to Preparing Planning Proposals Information Checklist

Section E – STATE AND COMMONWEALTH INTERESTS

Question 12.

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

- A) The Planning Proposal should nominate the state and federal agencies to be consulted and outline the matters that have triggered the need for the referral. Consultation will be confirmed by the Gateway determination
- B) The proponent or PPA should get preliminary views of any state or federal agency prior to submitting a Planning Proposal and include them in this section including any preliminary issues raised. This should include any scope of additional information/ investigations, evidence of consultation and any agreement in relation to the progression of the Planning Proposal

The Gateway Determination will advise the full list of public authorities to be consulted as part of the Planning Proposal process and any views will be included in this Planning Proposal following consultation.

Pre-lodgement advice was sought from the following agencies:

- Department of Planning, Housing and Infrastructure (DPHI)
- Transport for NSW (TfNSW)
- Sydney Metro
- Civil Aviation Safety Authority (CASA)
- DCCEW

Other agencies identified for further consultation are:

- Ausgrid
- Sydney Water
- Sydney Airport Corporation

Any issues raised will be incorporated into this Planning Proposal following the consultation period.

4. Maps

Mapping (including current and proposed zones/changes etc.)

- A) Mapping must be consistent with the Department's Standard Technical Requirements for Spatial Datasets and Maps using the same format, symbology, labelling and appropriate map scale.

The Planning Proposal seeks to make the following amendments to IWLEP 2022 maps:

- Amend existing Key Sites Map.

Refer to Appendix H.

5. COMMUNITY CONSULTATION

A) Must describe Consultation and outcomes undertaken with council, state agencies or authorities during the pre-lodgement stage

Consistent – community consultation will be undertaken following Gateway Determination.

The proposal has had a long history of consultation with Council staff. A Pre-lodgement consultation meeting was undertaken with Inner West Council's officers on 27 March 2023. The proponent provided a Scoping Proposal with supporting documents and received feedback on 17 May 2023 detailing various matters that needed to be addressed in the draft Planning Proposal.

This Planning Proposal has generally addressed the concerns raised in Council's advice (Appendix I). Further, the original proposal submitted in 2023 had various issues regarding lack of deep soil planting and landscaping. The proponent has positively responded to these issues by updating the Planning Proposal and submitting revised documentation indicating the provision of deep soil planting and landscaping on the site, including stipulating a site-specific provision for deep soil planting in the LEP which will provide certainty regarding the delivery of on-site tree planting. Further, on Council officer's request, the proponent has provided justification regarding the inability to meet 15% deep soil planting target for this site. This justification is considered acceptable in this instance and overall, the proposal will improve the site's existing conditions which has no deep soil planting and landscaping.

B) Any community consultation undertaken, or consultation with other key stakeholders

Consistent

The Planning Proposal acknowledges the standard consultation processes outlined in Division 3.4 of the EP&A Act and that the Planning Proposal to be publicly exhibited for at least 28 days.

Notification of public exhibition will be as follows –

- Notice on Council website
- Written correspondence to adjoining and surrounding landowners

If successful at the Gateway stage, the Gateway determination and Planning Proposal would be publicly exhibited and made available as digital and hard copies at Council offices and any other locations for the interested parties to view the submitted documentation.

6. PROJECT TIMELINE

The project timeline should include:

- Anticipated commencement date (date of Gateway determination)
- Anticipated timeframe to finalise the infrastructure studies/plan
- Anticipated timeframe for completion of any additional technical studies, not completed prior to Gateway
- Timeframe for public agency consultation
- Anticipated dates of public exhibition and, if required, a public hearing
- Timeframe for submissions to be considered
- Timeframe for the consideration of a proposal after the exhibition
- Date the plan will be made (where council is the LPMA) or date of submission to the Department to finalise the LEP
- Date of notification

The anticipated project timeline has been informed by the applicant's Indicative timeframe. In conjunction with these timeframes, see Table 1 for Project timeline with indicative dates which will be updated in the Planning Proposal submitted to DPE for Gateway Determination.

Table 1 - Proponent's Submission Indicative Timeframe

Process	Indicative Timeframe	Months
Revised proposal submitted by the proponent	1 year	November 2024
Consideration by Council	1 months	November – December 2024
IWLPP decision	4 months	December 2024
Council decision	2 months	March 2025
Submitted for Gateway	4 weeks	March 2025
Gateway determination	2 months	May 2025
Post Gateway changes (Pre-exhibition)	2 months	June – July 2025
Public exhibition period	1 month	August 2025
Consideration of submissions	Included in public exhibition period and assessment	Sept – Nov 2025
Submission to DPE for finalisation	4 weeks	December 2025
Gazettal of LEP amendment	9 months from the issue of Gateway determination	February 2026

Attachments

- Attachment 1 – Planning Proposal: 11 & 11A Edinburgh Road, Marrickville
 - Appendix A – Indicative Concept Architectural Plans
 - Appendix B – Urban Design Report
 - Appendix C – Traffic Impact Assessment
 - Appendix D – Preliminary Flood assessment
 - Appendix E – Acid Sulfate Soils Assessment
 - Appendix F – Economic Strategic Positioning Paper
 - Appendix G – Geotechnical Assessment
 - Appendix H – Proposed LEP Maps