

## Submissions Register for Employment and Retail Lands Study/ Strategy

Item ID	Location concerned	Issue/ comment	Key theme	Council Officer Response
01e	Marrickville Metro	The draft Retail and Employment Lands Strategy (EARLS) should update current and future demand and supply based on a holistic site analysis of Marrickville Metro and 13-55 Edinburgh Road. Due to the current consent on the site, 13-55 Edinburgh Road will not reflect an industrial employment land use in the near future. This should be reflected in the strategy to allow Council to get an accurate analysis on the current and future demand and supply for employment and retail land.	Accuracy and detail	The Proposal is under construction and was included in the modelling for the precinct.
31d	Carrington Road Marrickville	Carrington Road has more industries than just 'C' for Creative Industries - this should be changed.	Accuracy and detail	The EARLS Study and Strategy have been updated to acknowledge clustering of multiple key industries in Carrington Road and other precincts. There is further discussion in the precinct profile covering other clusters such as food manufacturing.
37b	5-15 and 30-32 Murray Street and 11 Edinburgh Road, Marrickville	<p>The EARLS significantly fails to account for and subtract industrial lands affected by the following current approvals which will reduce the amount of industrial lands available.</p> <ul style="list-style-type: none"> <li>• The Marrickville Metro Shopping Centre currently has approval to expand the centre to 13-55 Edinburgh Road. The draft Strategy incorrectly identifies the 13-55 Edinburgh Road expansion site as industrial employment serving uses aligned with its current zoning. This site is currently under construction with the projected completion date in 2020. It will transition from industrial uses to shopping centre serving uses aligned with and integrated into the existing shopping centre.</li> <li>• In addition, the strategy does not reflect the very significant loss of industrial lands which have been incorporated into the Sydney Gateway project, which will provide a high capacity connection from the Airport to Port Botany to the new WestConnex St Peters Interchange. This infrastructure project reduces the industrial land supply as the site transitions to transport infrastructure purposes.</li> </ul> <p>The EARLS should audit the existing employment lands and remove any land proposed for other land uses, e.g. Marrickville Metro 13-55 Edinburgh Road expansion site and the Sydney Gateway Project. This will ensure a more accurate measure of existing and future industrial land supply upon which a strategic policy response can be made.</p>	Accuracy and detail	Land with approval for expansion of Marrickville Metro has been deducted from the supply of employment lands. The loss of industrial land to Sydney Gateway as been accounted for on the basis of the available information at the time of writing. The area has been audited. The measure of employment floor space is considered to be accurate.
46i	Dulwich Hill	<p>Are the maps accurate?</p> <p>Pg. 136 – fails to show rezoning along the Light rail corridor from Arlington to Hawthorne Canal</p> <p>Pg. 259 – fails to mention 4-9 storey developments already within the shopping centre</p>	Accuracy and detail	Additional detail has been added to the precinct profiles for all centres. There is additional analysis on how centres could be enhanced in the future.
66c		Century Venues is strongly supportive of the 'agent of change' principle, which should be incorporated and integrated into all of the documents in the strategic planning framework, incorporated into the Development Control Plan (DCP) and Local Environmental Plan (LEP) and applied in all decision making across Council's remit.	Agent of change	Support for the 'agent of change principle' is noted. The recommended actions in the draft EARLS have been substantiated with further analysis in the Study.
50h		<p>Support required for:</p> <p>Retail areas: Pocket parks to gather in, green space to make an inviting to visit, encourage a range of retail, Protect retain areas for small business with % of area for cheap rent as we do for affordable housing.</p> <p>Industrial: Shared space for small business/owner operators, good public transport and parking.</p> <p>Zone areas for Industrial land, help operators to reduce waste and recycling</p> <p>Retain space in units: LEP and planning VPA [Planning Agreements] contain retail space affordable</p>	Assistance and support from local government	Proposal for affordable retail space provision similar to affordable housing has not previously been tested in NSW to our knowledge. Affordable rental space is not within the objectives of the Environmental Planning and Assessment Act 1979 (EP&A Act) like affordable housing. However, there may be potential where increased FSR is provided to seek affordable rental space, e.g. through Planning Agreements.

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51c		Need support for: Extended trading hours and more push for outdoor dining. Assistance in activating key areas within the precinct such as the Ashfield town hall forecourt. Lift the food standards and hygiene of establishments through further food safety audits as well as pushing landlords to provide better fixtures for tenants.	Assistance and support from local government	Most items expanded upon in EARLS Study. Food standards are out of scope for the EARLS.
51e		Need support for: Assist small business with day to day issues regarding legal issues such as public drinking loitering and other antisocial behaviours. Make it easier to deal with council (minimize red tape) My main business is cafe and corporate catering to government agencies and other companies within the inner west. There is talk of such businesses moving out of the area which I believe would be a major issue to small businesses like myself.	Assistance and support from local government	A key aim of the Strategy is for the protection of existing employment floor space within centres and growing the amount of employment floor space overall, to retain and grow local business.
53a		Concern the council trade panels do not favour local businesses appropriately and discourages and undermines local small businesses, contracts in the panels are also unreasonably long. Council should ensure that the assessment criteria weighting for tenders for council contract works such as maintenance Trades Panels favours local trade contractors. The last round of Inner West Council (IWC) trades panels tenders has resulted in less reliance on local trade businesses and more reliance on contractors from much further away, for example the Hills Shire. This not only undermines the local economy, but it puts more traffic on the roads and it actively defeats Council's own efforts to reduce CO2 emissions. The duration of trades panel contracts also needs to be looked at as some of the contracts from 2018 are for 7 years, which is highly unusual to say the least. Typical contract lengths are more like 3 years. This allows for more competition on a regular basis and opportunities for new local contractors to tender. Finding staff is always an issue for businesses. Finding a job is always difficult for local people. Perhaps council could somehow assist in matching local people to local businesses. This could help keep employment local, help keep spending local and also reduce impacts on transport and vehicle emissions over time."	Assistance and support from local government	Matters outside of the scope of the EARLS. These comments have been referred to the Economic Development Team and Council's Procurement section for further action.
53b	Marrickville	Commercial waste collection for small businesses would be appreciated. We understand that this is done in the former Leichhardt Area, but not available in the Marrickville area.	Assistance and support from local government	Matters outside of the scope of the EARLS. Comments referred to Council's resource recovery team.
53c		Perhaps Council could develop a program to help young local people who are looking for jobs, apprenticeships or traineeships etc. to be matched up with local businesses who are looking for new staff. This might be of particular assistance for young indigenous people.	Assistance and support from local government	Matters outside of the scope of the EARLS. Comments referred to Council's economic development team.
53d		Perhaps a forum for Council officers from relevant sections to speak with local business owners so that they can understand how their day to day decisions affect small businesses in the area. Things like parking issues, tender opportunities, waste collection, e-waste and recyclables, public lighting, procurement, DAs etc. etc. This might also be an opportunity for council to explain to business owners what services and programs are available.	Assistance and support from local government	Matters outside of the scope of the EARLS. Comments referred to Council's economic development team.

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54a		Request for a local government expert in local, state and federal government grants and other services for small business. "The main support I need from Local government is advice and expertise on what local, state and federal government actually provides for my business: e.g.: it would be good to have a resource within Local government with expertise that can help both navigate, assess appropriateness of the grant versus business and assist with the application. The main benefit of having a local government expert (rather than a private one) is i) familiarity of the bureaucratic machine ii) trust ... private sector operators may not be trust worthy or have reputable history in helping small businesses.	Assistance and support from local government	Matters outside of the scope of the EARLS. Comments referred to Council's economic development team.
54d		Provide more mentoring other than digital marketing. Bank finance, Private equity, link small business with academia. Offer IT support and other services including how to navigate through local government service is about trust and can be charged out. Business Mentoring for a local government point of view is really more about how the public can find and use information. There has to be an element of 1 on 1 hand holding especially for new contacts.	Assistance and support from local government	These matters are out of the scope of this EARLS.
54e		Co-work office should be rolled out to Co-Work Warehousing. Councils support various charities and organisations like Men's shed ... but similar space for business like mine that need warehousing is also needed. Private sector is either too large +1000sqm or 3 and 4 times more than our current commercial leases. As an e.g.. our lease at 21 North St Leichhardt is approx. \$30K for 210 sqm. A commercial lease on Parramatta Road Leichhardt is \$120K for 350sqm. Rather than asset recycle and sell off town halls, bowling clubs, excess storage etc., local governments could provide a Co-Work Warehouse scheme, with partial subsidies and a 5 year lease period with first in first served basis. At end of lease existing tenant can renew, but goes to the end of the list. if no other applicants then then can renew. Space can be allocated based on need. I see established businesses with solid track record should have priority, but a ratio of start up vs. fledgling can be developed.	Assistance and support from local government	Co-work warehousing to combat high rental prices and may assist meeting the need for medium sized warehouse spaces and creative industries spaces.
55a		Inner West can assist with helping creatives to make the community aware of different creative projects. Whether it is allowing banners to be put up on government sites (like bridges) free of charge -- would assist in the challenges facing local creatives	Assistance and support from local government	These matters are out of the scope of this EARLS.
55h		Suggestion for council to support local businesses working together to support each other e.g. theatre playing locally made films: "I am a filmmaker and theatre-maker. In relation to my specific business, telling stories that reflect who we are, I believe is important. The challenge, which is only getting harder and harder, is how to get the community to attend the theatre shows we put on and the films we make so that us creators can be sustainable. Using a most recent example, we made a film titled Me & My Left Brain which was shot in the inner west. The film played across the country but we couldn't get Palace Norton street to play the film. It would have been great to get local government to provide whether it was incentives, or whatever, to get a small filmmaking company like us to work with an established local business."	Assistance and support from local government	Council is currently developing a Cultural Strategy. This will explore opportunities for creative spaces and cultural infrastructure development.
57a		Support for applications and "reasonableness" in DA processes to enable established businesses to modify DAs to meet changing needs to stay in business. It would be good to have a "complying DA" option requiring no red tape for small low impact non-main road businesses to vary existing hours of operation e.g. 9-5 to for example 12-7pm or 1-8pm during daylight saving for instance or a combination of different times/days based on business survival needs so long as there is no increase to hours of operation.	Assistance and support from local government	Flexibility of DAs for businesses expanded upon within the Study.

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47b		The constant pushing of "creative industry" is a farce. They and many industries are being pushed out by breweries and other pseudo industrial businesses as they are causing massive increases in rents. Rents are increasing by more than 50% as so called "creative industry business" that are really food business allowed to occupy Industrial sites. Greg Murphy Scenery (set Builders) were a tenant for 25 years on Mansfield St in the Steel works but evicted so a brewery can go in.	Breweries	The EARLS Study has been updated in relation to growing the stock of suitable employment floor space and clause to encourage creative industries. Microbreweries are a permitted use under the Standard Instrument. Impact of rents from Artisan and Food and Drink Industry has been reviewed and study has been updated to respond.
31c	Marrickville	Action 1.1.1 - Save Marrickville disagrees with the categorisation of Marrickville as a Town Centre and would recommend it be designated as 'Local Centre'.	Centre hierarchy	Centre classification is based on the size and function of the centre. This categorisation also covers centres such as Leichhardt and Balmain. No change is recommended.
38b		The Employment and Retail Lands Strategy 2019 states that new out of centre mixed use areas threaten the viability of existing centres, employment, urban service and productive uses. These new centres however are generally resultant of need or demand, and they should continue to be supported by Council provided they can support the immediate catchment, while being an intensity which does not significantly challenge existing centres.	Centre hierarchy	The position of the EARLS remains unchanged. The need to support the role of existing centres is clearly articulated within the Strategy and supporting study. The Study and Strategy also acknowledge the continuing role of existing standalone centres.
38g		Woolworths appreciates the utility of a clear centre hierarchy because it provides a clear intention for future growth and investment. However, centre hierarchy should not restrict the creation of out-of-centre retail or simply act to designate particular forms of retail (including supermarkets) to particular centres. Retail development should be provided where required to ensure community needs are met.	Centre hierarchy	No further amendments proposed. Out of centre supermarkets prevent the establishment of such uses in more appropriate and sustainable locations.
01a	Marrickville Metro	The draft LSPS should highlight Marrickville metro as a Local Centre	Centre hierarchy	Marrickville Metro is a freestanding shopping centre and identified as such in the Centres hierarchy in the Strategy.
01f	Marrickville Metro	Marrickville Metro should be identified as a local centre, which aligns with the Eastern City District Plan. The importance of Marrickville Metro in the local economy should be recognised in the EARLS Strategy and the draft LSPS.	Centre hierarchy	Marrickville Metro is a freestanding shopping centre and identified as such in the Centres hierarchy in the Strategy as it does not function in same way as local centres.
01g	Marrickville Metro	The EARLS should investigate potential synergies from nearby centres versus seeing these centres as drawing from each other's trade areas.	Centre hierarchy	Synergies have been considered where appropriate. Freestanding shopping centres have traditionally been demonstrated to compete with local high street centres.
47g		Concern for perceived lack of consultation with local business owners: "It is before state government but none of your staff or Hill PDA are aware of this!.. No one in 20 years has ever walked into my business from Council and the last few times you have employed Hill PDA over 10 years they didn't even know I existed even though we have a \$3,000,000 business and employ 10 people."	Consultation	Your response and input into EARLS is noted.
		Please make the draft simpler and with examples so that a lay person can better understand the proposals and strategies.	Consultation	Strategy has been amended to clearly articulate the vision. Additional case studies have been added.
67f	Sydenham Station and Sydney Metro Train Facility South	Sydney Metro would like the opportunity to work collaboratively with Council in preparing a site specific development control plan to inform the future built form and character of the site. Sydney Metro would like to ensure that future development on this site: •achieves transit-oriented development principles by prioritising employment growth •leverages the investment and connections to public transport; and •assists in securing long term economic productivity by offering a diversity of spaces.	Consultation	Comments are noted, Council looks forward to continuing discussions with Sydney Metro.

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06b		The City supports Actions 9.1 to implement the Draft Employment and Retail Strategy specifically Actions 1.6.1–1.6.6, which aims to develop a planning framework to better support innovation, culture and creative uses.	Creative industries	Support noted. These actions have been revised in line with additional analysis provided within the Study document.
06c		The City supports Action 9.1 of the draft Planning Statement which acknowledges that through the implementation of the Employment and Retail Strategy, provisions will be incorporated in the LEP and DCP to reduce regulatory barriers and encourage creative and cultural industry clusters. Removing the regulatory burden of a development application may make it easier for these activities to occur more organically in existing premises.	Creative industries	Support noted. Study content has been revised to consider comments from City of Sydney regarding use of existing employment floor space for creative uses. These actions have been revised in line with additional analysis provided within the Study document.
40c		We are in full agreement with the University of Western Sydney's research finding that many forms of cultural and creative production have particular needs that are currently mismatched with the character of new mixed-used developments (p. 29). Shop-top redevelopment on main streets of certain town centres (Marrickville is our main concern) offers opportunity for some appropriate creative and light industrial spaces. The EARLS anticipates this to some degree, by recommending certain design provisions (e.g. Action 3.3.2). With more flexible and appropriate design, we are confident that ground floor retail space that is often vacant could be adapted to provide space for creative activities (e.g. galleries, studios, recording and rehearsal studios, music venues, community arts facilities, light manufacturing). In sum, we fully support the strong signals in the EARLS to protect industrial lands, and to plan for the needs of the creative communities in the Inner West.	Creative industries	Support noted. Analysis within Study has been updated with additional substantiation.
66d		A better understanding of (and statutory definition of) creative industries and cultural infrastructure in all its forms, is necessary to improve local understanding of the conditions and future needs of these activities and facilitate their development through the planning process and statutory framework.	Creative industries	A statutory definition of 'creative industries' in the LEP would require State intervention. The EARLS Study has been updated with further analysis and substantiation on actions relating to creative industries and cultural infrastructure. Council's City Living unit is currently undertaking further studies in relation to community and cultural infrastructure.
66f,		Obtaining creative spaces as public benefits has worked well in some locations. However we wish to draw your attention to the Contributions Plan for the Victoria Road Precinct, which until the recent post-exhibition amendments contained a generic requirement for 'social and cultural infrastructure'. This requirement was deleted from the version adopted by Council on 22 October 2019. Without appropriate provision being made for these facilities in the Strategic Planning Framework and relevant Contributions Plans, the provision of cultural infrastructure is ad-hoc and will not meet the needs of the local community.	Creative industries	Difficulties surrounding the achievement of objectives for the Victoria Road precinct are acknowledged. A Community Assets Needs study is in preparation to inform a future Inner West Contributions Plan, to ensure that specific needs can be met in line with growth.

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36i		Incorporation of more diverse activities and uses into ground floor spaces of shop-top redevelopments - The research team concurs with the University of Western Sydney's research finding that the spatial needs of many forms of cultural and creative production are mismatched with the character of new mixed-used developments (p. 29). Shop-top redevelopment on main streets of certain town centres (Marrickville, Norton St, Balmain-Rozelle, Parramatta Rd) could provide an opportunity to proactively target new affordable forms of certain, appropriate creative and light industrial spaces. The EARLS anticipates this to some degree, by recommending certain design provisions (e.g. Action 3.3.2). With more flexible and appropriate design, ground floor retail space that is often vacant for considerable periods could be adapted to provide space for other activities (e.g. recording and rehearsal studios, music venues, community arts facilities, light manufacturing). One means to rectify this is to encourage developers of main street shop-top apartment complexes to provide community creative infrastructure at ground level (either street facing, or rear-facing) as alternatives to retail.	Creative industries	The Draft Study has been updated to provide stronger analysis and substantiation for providing suitable spaces for a wider range of employment uses (other than retail) outside of Industrial areas.
66h, 7c, 8b	Victoria Rd and Sydenham and Marrickville precincts	The EARLS proposes that non-mandated tourist and accommodation uses, such as serviced apartment, and retail uses be prohibited in the B5 zone. We can only assume, because the documents do not specify, that non-mandated' means uses not specifically included as 'permissible with consent' in the B5 business zone in the standard template LEP. The EARLS says this is a because it would place a proportion of the precinct at risk of development for non-employment uses; this statement is not backed up by evidence. In this case 'Dwelling house,' 'Food and drink premises', 'Hotel or motel accommodation' and 'Markets' might all be prohibited in the B5 zone in Marrickville. Given permissibility with consent for 'Any other development not specified in 2 or 4' in the Land-use table of Marrickville LEP, many other types of uses are likely to be prohibited under this arrangement, including creative industries and cultural infrastructure and services. The intent and justification for this proposal is not provided. Prohibitions such as these are regressive and will deny the natural evolution of the Rich Street Precinct into a state significant arts hub. In addition, these changes would contradict the recently adopted DCP intention of the B5 zone along Victoria Road Marrickville that is intended to provide a mixed-use place for people along this busy movement corridor. Restricting permissible uses in this way will stifle development opportunity without adequate justification or outcome. Use a proactive approach instead.	Flexibility for employment and industrial lands	Comments relate to the B5 Business Development zone in Victoria Road precinct. The DCP seeks street activity, through ground floor uses, not through accommodation. The area surrounding the B5 zone has many B4 Mixed Use zones in close proximity, which permit serviced apartments. The intent of the B5 zone is business development. Permitting accommodation would raise the land values making it harder for new business to move into the area. Intent and justification behind the changes to permissible uses in the B5 - Business Development zone have been substantiated within the EARLS Study. Prohibitions are recommended to increase land available for employment uses. Note that the full range of office, business and light industrial uses, as well as food and drink premises are permitted, including creative industries that fit within these defined terms.
02c	Land within the block of Robert St, Mullens St and Mansfield Rd, Rozelle	Flexibility in planning controls: support the need to update and improve the flexibility of the planning framework to recognise and cater for creative industries and to respond to the changing needs of business and industry requirements in the future consider that action 3.1.1 that seeks to ensure that there is no rezoning of industrial land is directly counter to this objective, and fails to recognise the changing nature of industry; fails to leverage off the very significant investment in transport including the new Metro West train station (discussed above); and will inhibit rather than enhance economic productivity and employment and growth into the future.	Flexibility for employment and industrial lands	The site referred to is currently zoned IN2 - Light Industrial and part of White Bay Industrial precinct, identified as being of strategic importance in this Study. The Strategy is consistent with the direction in the Eastern District Plan to 'retain and manage' industrial land into the future. Retention of industrial land in these areas is critical to the future economic productivity for Sydney region and especially for the inner city districts. The light industrial zone has a very broad range of permitted land uses, giving good scope for industry adaptation and employment opportunities.
19a	1-7 Unwins Bridge Road, St Peters	Council should actively encourage suitable economic activity in areas such as the 1-7 Unwins Bridge Road site through supporting the reconsideration of existing IN1 zoning and permitted land uses. Site should be rezoned to IN2 Light industrial with increased building height and FSR, no land acquisition area and the following additional permitted uses: Agricultural produce industries; Bulky goods; Business premises - Despite any other provisions/restrictions in the MLEP and only if above ground floor. Food and drink premises; General industries; Health services facility; Office premises; - Despite any other provisions/restrictions in the MLEP and only if above ground floor. - Only if above the ground floor. Passenger transport facilities; Timber yards.	Flexibility for employment and industrial lands	The EARLS takes a broader strategic approach. It is not a tool for site specific additional uses. EARLS position to retain and manage industrial land is consistent with the Eastern City District Plan, and recognises the importance of these industrial lands to the trade gateways. Site specific additional uses would require a site specific planning proposal.

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38h, 60b		There needs to be recognition of the need for greater flexibility within centres and employment and industrial lands. The rapid rate of change in today's business environment means businesses must be able to quickly amend their service delivery to remain competitive. Flexibility for businesses will result in a stronger economy long term. This should also be applied to lands near White Bay.	Flexibility for employment and industrial lands	No further amendments proposed EARLS addresses changing nature of businesses in Chapter 6 of Study and this has been considered in the planning controls review in Study. White Bay Industrial precinct section of the Study has undergone revision and updates addressing the range of submissions received.
67b	Sydenham Station and Sydney Metro Train Facility South	Sydney Metro's vision for the residual lands adjacent to Sydenham station is for an employment precinct that is unique, productive and leverages the strong connections to public transport. An employment precinct will address demand for affordable office space in CBD fringe areas and assist in securing long term economic productivity for the LGA. The available area will also ensure sufficient services and amenities for tenants, including opportunities to introduce open space and capitalise on active transport connections. These residual lands are also able to demonstrate flexibility in floor plate sizes that respond and prioritise employment growth across a number of industries and markets that benefit from proximity to the CBD and other specialist precincts along the rail corridor. As identified within the EARLS Report, the introduction of Metro services to Sydenham alongside the existing Sydney Trains network will provide more frequent and reliable passenger services to the CBD and wider network. Sydney Metro requests Council to consider the strategic potential of this large consolidated land holding adjacent to Sydenham station to demonstrate a transit oriented development with office and light industrial uses, including affordable spaces and ensure that future development on these sites are flexible and can respond to changing markets.	Flexibility for employment and industrial lands	Study refers to the retention of the site for employment land. A site-specific planning proposal, such as for additional employment uses, would be required to consider this.
14b	St Peters Business Park; LGA-wide	Optimise and enhance the use, function and output of existing general industrial zoned land where contextually appropriate by encouraging innovative built form, design, density and correct parking provision requirements. IN1 zone is scarce and doesn't respond to changing industry. FSR controls for St Peters Area IN1 zone should be relaxed to at least 1.5:1 to facilitate more employment with more advanced technology.	FSR - employment lands	Actions to amend FSR within industrial zones have merit however require further investigation to ensure unintended consequences have been considered. An action exists within the Strategy which reflects this.
37c	5-15 and 30-32 Murray Street and 11 Edinburgh Road, Marrickville	We support the draft Strategy's action to investigate the removal or increase of Floor Space Ratio (FSR) controls on industrial land in the vicinity of Sydenham Station. This is the clearest and most logical pathway to allow the market to respond to current industrial demand within the Marrickville-Sydenham Precinct. However, it is important to emphasise that the Strategy should be more definitive and direct the change as opposed to simply "investigate" it to give market certainty. Given that the strategic priority at a District Plan level is to ensure sufficient employment lands to meet Council's stated projected demands, the LSPS response must in turn be definitive and affirmative. The draft Retail and Employment Lands Strategy highlights the deficit of 180,000m2 in meeting this future demand [albeit that we say it has underestimated this deficit due to the unrecognised site withdrawals] and as such the policy response in the LSPS must be direct and expedient. The removal of floor space ratio controls in the Marrickville-Sydenham Precinct is essential if the strategic priority to facilitate the required employment floor space is to be met.	FSR - employment lands	Amendments to FSR controls need careful consideration and cannot be amended without supporting evidence based studies. The Study and Strategy flags review of floor space ratio controls within employment precincts.

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67e	Sydenham Station and Sydney Metro Train Facility South	In accordance with Action B.2 of the EARLS, Sydney Metro agrees to the removal of FSR provisions to improve utilisation and increase flexibility in built form outcomes in proximity to Sydenham station. This will allow for the residual land holdings to appropriately respond to the demands of the market. Given the maximum heights dictated by the Obstacle Limitation Surface (OLS) and recommended zoning for the site, the removal of FSR provisions will ensure that future development responds to the objectives of the B7 Business Park zoning in being able to provide a range of office and light industrial uses and encourage employment generation on site.	FSR - employment lands	Support for removal of FSR noted.
02d, 33a, 66a		General support of the key objectives and principles of the report	General	Support noted.
07c, 08a		Support for intent of EARLS as it intends to increase employment containment	General	Support noted
18g	Marrickville Town Centre	Ensure that planning density controls are constantly reviewed to ensure development uptake occurs within the existing town centre, to support its economic growth and investment.	General	All strategies are reviewed every few years. EARLS will require review earlier than usual, as a result of the economic fallout of the COVID-19 pandemic.
31i	Marrickville	Action 5.1.1 - Save Marrickville is supportive of Action 5.1.1 that aims to provide a clear framework to provide clarity for businesses and residents in regards to zoning and the permissible uses within zones.	General	Support for no residential on industrial lands is noted.
38d		•Woolworths generally supports the protection and where necessary the expansion of employment lands within Inner West.	General	Support noted.
40a		We are in full support of the EARLS strategy in its support of creative and diverse economies: Supporting night time economy land uses in town centres Supporting and protecting land used for industry and urban services that business and residents need to operate Managing impacts of new land uses on residents with new development controls Supporting more public facilities, employment floor space or affordable creative and co-work space' We particularly recommend protecting industrial lands and retaining industrial zoning. Research we have done with community (links provided) has helped us understand that industrial lands are essential for creative practice.	General	Support for creative and diverse industries noted. Analysis within the draft Study has been updated with additional substantiation.
66a		The framework is strongly supportive of creative and cultural land use and activity and encourages opportunities for jobs, industries and development of businesses in the sector, within which Century Venues is a significant contributor. Century Venues supports these objectives and the intent of the strategic planning framework. In particular Century supports the stated aims to create more and better jobs and greater productivity within the Sector and to support and strengthen the night-time economy.	General	Support for comprehensive strategic framework and support for night time economy, creative industries and better jobs and greater productivity.
59b	Dulwich Hill	Suggestions to support business growth and sustainability: Promote Dulwich Hill as a hub of artisan producers. Promote female and diverse entrepreneurs. Position the Inner West as Australia's entrepreneur incubator capital. Promote Service NSW's 'Easy to do Business' service for start ups.	General	The Strategy recommends allowing artisan food and drink industry and light industry in B2/B4 zones across the LGA. It also addresses the need for suitable flexible ground floor employment floor space including start-ups and incubators.



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01d	Marrickville Metro	The Marrickville Metro site should be expanded to 13-55 Edinburgh Road to reflect the active consent on the site, which construction is well underway.	General retail/commercial	Site included in the precinct as indicated on Map within the precinct profile of the Study document.
06e		The City continues to develop its Open and Creative planning reforms, which may apply to King Street, Newtown. These proposed approaches include allowing shops on high streets and business precincts (B2, B3 and B8 zones) to extend trading until 10pm as exempt development to encourage a more diverse evening economy. The reforms also propose the temporary use of premises for small scale cultural activities as exempt development, provided criteria ensuring minimal environmental impact are met. The City welcomes the opportunity to collaborate with Inner West Council on the development of planning controls for a coordinated planning approach that supports innovation, culture and creative uses, particularly along King Street, Newtown.	General retail/commercial	An action in the Strategy has been drafted to reflect the following: "a collaborative working arrangement with the City of Sydney to develop a joint strategy for land use planning and night time economy on King Street."
15a		EARLS should include further consideration of the current and emerging trends in retail formats, in that the traditional format of the existing large national chains should not be used as a guide for all future large format retailing. Kaufland recommends that larger format retailing should be provided further scope, to allow further diversification of retailing in the LGA.	General retail/commercial	The B6 - Enterprise Corridor zone is designed to support large format retailing (specialised retail premises). The B5 zone also supports this use. However, supermarkets should be located in centres to enable walkable access. This is reflected within the Study and Strategy.
15c		Explore opportunities for retail and shops to be included in a wider variety of zones and provide consistency across the three LEPs	General retail/commercial	Study amended to provide further discussion regarding the role of retail generally in the LGA.
16a		Large Format retailing isn't distinguished from general retail. EARLS uses Bulky Goods Definition instead of Specialised Retail Premises. Specialised Retail Premises should be included in more zones and areas. Include Specialised Retail Premises as an allowed use in the B6 zone. Where Specialised Retail Premises are permissible, consideration of shops and business premises capped to a gross floor area should be permissible to support the vitality of the specialised retail premises.	General retail/commercial	The term Bulky Goods Retail has now been changed to 'specialised retail premises'. Suggested mix of uses is not supported as it would encourage out of centre retailing and impact on the supply of employment land. No change is recommended to proposed policy position.
18d	Marrickville Town Centre	Include an Action that allows the planning controls to permit the option of non-residential uses within a basement arrangement such as a 'gym' or a small 'neighbourhood supermarket' without impacting upon density planning controls.	General retail/commercial	Study updated with further discussion on increasing non-residential floor space within centres. Specific design typologies suggested require further investigation. Ground floor spaces in mixed-use development is covered in detail within the Study and Strategy.
18e	Marrickville Town Centre	The Marrickville Town Centre be identified as a key 'employment land precinct', and a monitoring program be implemented to track the economic viability of businesses within the town centre to ensure planning controls and Council policies are current against economic trends and against new competing precincts, and developments within the town centre.	General retail/commercial	The EARLS monitoring program regarding centres is now discussed in further detail. Refer to Study and Strategy for enhanced discussion analysis and actions relating to Centres.
20a	14-36 Seaview Street and 374-376 New Canterbury Road, Dulwich Hill	Site in B2 zone should be redeveloped	General retail/commercial	Redevelopment of a precinct is a matter for the landowner and outside the scope of the Strategy.
30a	Properties on the corner of Marrickville Road and Gerald Street	There is demand for office space in Marrickville however the existing older style retail and commercial office strips along Marrickville and Illawarra Roads are not suitable due to their old age, small lot size and lack of parking.	General retail/commercial	Analysis of retaining and growing supply of employment floor space in Centres and accompanying recommendations have been updated. There are actions within the Strategy to require minimum non-residential floor space within Marrickville Town Centre which would support opportunities for office space as part of redevelopment.

Item ID	Location concerned	Issue/ comment	Key theme	Council Officer Response
31b	Marrickville	Action 1.1.3 - Save Marrickville supports initiatives that increases use of Marrickville local centre, defined as the immediate vicinity of the train station and intersection of Marrickville and Illawarra Roads. The expansion of Marrickville Metro shopping mall threatens the viability of the Marrickville local centre as defined above. Initiatives encouraging local events and optimising pedestrianism will all positively contribute to the liveliness of the Marrickville-Illawarra Road precinct.	General retail/commercial	Support noted. Further discussion of encouraging events and creating public domain to support these activities has been prepared within the Study and Strategy.
31f	Marrickville	Strategy 3.3 and Actions 3.3.2 and 3.3.3 Save Marrickville is concerned by the many vacant ground floor retail tenancies in new developments (particularly along Illawarra Rd). As such we support the initiative (Action 3.3.2) of establishing minimum floor to ceiling heights for ground floor tenancies in the B4 Mixed Use zone and B6 Enterprise Corridors, to broaden the business base that use these spaces. For the same reasons we also support Action 3.3.3 that encourages diversity in the size and composition of floor plates.	General retail/commercial	Support noted. Further supporting analysis has been prepared to further substantiate these actions.
38a		Woolworths strongly supports the provision and monitoring of additional retail floor space in accordance with the Employment and Retail Lands Strategy, in line with residential growth and demand.	General retail/commercial	Support for provision of retail space in line with residential growth noted.
43a		The Employment and Retail Lands Strategy outlines actions for improved vibrancy of business centres and main streets with reduced car dominance and more attractive streets where people want to spend time and money. It'd be good to have the Inner West Economic Development Strategy align with the EARLS Strategy on the intention for improved main streets.	General retail/commercial	Comments referred to Economic Development team for consideration.
46d	Dulwich Hill	Encourage a range of retail business so our small shopping centres don't become deserts of coffee shops which are empty during the week and close early; of small bars which are not opening during the day - Make retail areas inviting – improve greening, fix footpaths quickly - Not make outdoor eating at the expense of pedestrian access and safety e.g. SideWays café, Constitution Rd, Dulwich Hill or parking spaces	General retail/commercial	The draft Study and Strategy have been updated to provide further detail on how to increase supply of flexible floor space within Centres to accommodate a range of uses. Trends and Influences Chapter covers the improvement of the public domain in centres.
46h	Dulwich Hill	Shop top dwellings leads to empty shops as seen as in New Canterbury Rd, expensive rents. Business models by Developers encourage low occupancy e.g. Arlington grove – café has been empty for 2 years, never occupied.	General retail/commercial	The EARLS have observed vacancy rates in Centres, and there are notable clusters of vacant premises in Dulwich Hill.
50c		Concern residential uses in centres pushes retail rent up resulting in a lack of diversity of uses such as small businesses e.g. lots of cafes. Retail areas can quickly become deserts of coffee shops and cafe, empty during the week, over crowded at the week-end. Other services need to be encouraged in our retail centres such as doctors, government departments, clothing, motor mechanics etc. Retail centres need to have affordable rents (apartment blocks do not provide this), have places for people to sit and chat and well maintained pocket parks.	General retail/commercial	Increased population in the retail catchment supports increased spending in a centre. The draft Study has been amended to provide stronger analysis and substantiation for providing suitable spaces for a wider range of employment uses in centres. There is also additional analysis and recommendations regarding enhancing and growing public domain space within centres.
50d		Protect retain areas for small business with a proportion of area for cheap rent as we do for affordable housing.	General retail/commercial	Proposal for affordable retail space provision similar to affordable housing has not previously been tested in NSW to our knowledge. Affordable rental space is not within the objectives of the EP&A Act like affordable housing. However, there may be potential where increased FSR is provided to seek affordable rental space, e.g. through Planning Agreements.

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51b		There should be more pressure put on realtors to lower rent. On Parramatta Rd for example our experience has been that a real estate would rather see properties sit vacant for months or years rather than lower rent to encourage new tenants. Lower interest rates aren't passed on to the tenants. Council supported pop-up leases would be great to encourage new creatives to the area who are just starting out.	General retail/commercial	Strategy aims to grow our pool of usable employment floor space.
51f		I directly deal with the inner west council as they are my landlord but find it very difficult to grow my business as I don't have sufficient support. (leasing, etc.)	General retail/commercial	EARLS aims to grow our pool of usable employment floor space in the LGA. Specific questions on leasing should be directed to Council's property team.
52a	Parramatta Road	I have a business on Parramatta Road and I don't agree with the design - would rather see more green and parking now that stress is off Parramatta Road to revitalise shops.	General retail/commercial	Parramatta Road, while having a number of vacancies is a thriving location for business, with a number of identified clusters. The future of Parramatta Road corridor will be considered as part of further studies which are foreshadowed in the EARLS. Please note that the Precinct Profiles for the Parramatta Road corridor have been updated considerably to provide further analysis. Also please note that Council has commenced an Urban Amenity Improvement Program (partly funded by State Government) for parts of Parramatta Road, which will provide for amenity improvements.
54b		Ensure adequate supply of commercial property and space, with truck handling, load zones and appropriate delivery enabling infrastructure. This can be done by closely managing the residential / retail / commercial zoning to ensure supply and reduce rents.	General retail/commercial	The draft study has been amended to provide commentary on this. The EARLS includes actions to deliver supply of flexible and usable employment ground floor space in mixed use, with consideration of delivery needs. Local Distribution Centres are recommended to be included as permissible in/near centres, to facilitate alternate forms of delivery.
56b		Develop strategies to attract visitors and revitalize the Balmain peninsula as a desirable destination.	General retail/commercial	These matters are out of the scope of this EARLS.
59a		Make it easier to apply for change of use. Characterise the various business centres and marketing on that basis. Work with the state and federal governments to advocate for activation of empty commercial spaces.	General retail/commercial	Marketing is a matter for the Economic Development team of Council. Ease of change of use has been discussed in the Study. The EARLS have observed vacancy rates in Centres, and there are notable clusters of vacant premises in Dulwich Hill. The development of planning controls for flexible and usable ground floor employment space will enable more usable premises to become available in the medium-long term. Matter also raised in Community Workshop. Planning section has been reviewed in light of this. A statement is included to reflect difficulties in aligning uses with Standard Instrument LEP / SEPP Exempt and Complying Development. It is suggested that the DCP includes laymans terms and how they fit within Standard Instrument LEP definitions, which will assist this issue.

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04a	Camperdown Ultimo Collaboration Area	<p>The EARLS' strategic planning for the Camperdown Ultimo Precinct needs more clarity/direction.</p> <p>Amend several strategies/directions to develop the Camperdown Ultimo Precinct. Include the following new actions: 13.6 Continue collaboration with NSW Government, City of Sydney, TAFE NSW, University of Notre Dame, University of Sydney, University of Technology (UTS) Sydney, NSW Health, Sydney Local Health District and other relevant stakeholders to ensure that productivity and industry cluster growth outcomes are prioritised in the Camperdown Health and Education precinct. The Alliance recommends that the following point should become the first sub-action of C4:</p> <ul style="list-style-type: none"> <li>• Safeguarding appropriate existing employment floor space to accommodate health, education and creative industries especially in the sphere of connections between these activities and innovation.</li> </ul> <p>We also recommend that the following point be added to the C4 sub actions:</p> <ul style="list-style-type: none"> <li>• Encourage active ground floor uses and facilitate the night time economy to create a vibrant, amenable environment. Camperdown into a medical and biotechnology hub' but recommend this strategy be fine-tuned to:</li> </ul> <p>'Support the transition of Camperdown into a 'health, education and innovation precinct including a biomedical and biotechnology hub'. This captures the key role of educational institutions such as Sydney University/UTS/Notre Dame/TAFE in delivering this transition.</p> <p>Planning priority 12: The Alliance recommends that this objective be replaced with the following text:</p> <p>'Encourage the evolution of the Camperdown health and education precinct where leading-edge anchor institutions and companies will cluster and connect with start-ups, business incubators and accelerators by facilitating growth of its critical mass, increasing its competitive advantage, enhancing its quality of place, strengthening diversity and inclusion and boasting culture and collaboration.'</p>	Health and education precinct	Feedback from Camperdown Ultimo Collaboration Area Alliance has been incorporated into the drafting and recommendations of the EARLS Study and Strategy.
17a	Camperdown Ultimo Collaboration Area	<p>HillPDA's study has no clear direction for expanding the education and health industries. IN2 zone retention in Camperdown is inappropriate</p> <p>"Council should reject the recommendation of the Hill PDA report that no rezoning be consider in the Camperdown employment lands and consider supporting greater employment density and diversity in the precinct."</p>	Health and education precinct	This area will be subject to the <i>Camperdown Innovation Precinct Strategic Employment and Land Use Study</i> . Retention of current zoning, pending the outcomes of the study, is appropriate.
03b, 33a		General support of the intention to recognise the importance of industrial land in providing employment opportunities - we cannot afford to lose any more Industrial land in the Inner West LGA.	Industrial	Support noted.
07a	Sydenham and Marrickville Industrial lands, Victoria Road	Industrial land use in Sydenham and Marrickville, including the Victoria Rd precinct, is not intensive enough and is in competition with nearby industrial areas. Zones do not suit the greater strategic uses on site. Increase FSR in IN1 and IN2 zoned land to a range of 1.5:1 or 2:1; Allow creative industries as a permissible use in IN1 and IN2 zoned land; Don't prevent office or business premises in IN1 and IN2 zoned land.	Industrial	Further analysis is required to determine appropriate FSR controls in industrial zones that will not drive up land values. Study has been revised to provide additional analysis and substantiation for recommendations in relation to creative industry LEP clause. Permitting office and business premises that are not related to the industrial or creative uses sought in this area would drive land values up, reducing the viability of the industrial and creative uses.
11a	67-75 Lords Road, Leichhardt	Current B2 and R1 zones don't suit the site. Recommend to amend planning controls to facilitate mixed use development on the 67-75 Lords Road Leichhardt site	Industrial	The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. The site is zoned IN2. The EARLS position on industrial to residential/mixed use rezoning is consistent with the 'retain and manage' approach in the <i>Eastern City District Plan</i> .
14a	St Peters Business Park; LGA-wide	Support for the retention and protection of industrial land. Encourage urban renewal in existing industrial zoned land where contextually appropriate and accessible in response to the shifting job demands and employment landscape without jeopardising job targets.	Industrial	Support noted.

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22a	Cooks River Intermodal and freight rail corridors	Freight lands should be protected. it is unclear how EARLS is supporting Action 31(c) [supporting the land use needs of freight movement to increase the proportion of container freight transported by rail (LSPS)]	Industrial	Importance of this precinct has been discussed further in the EARLS Study including development of a case study on the terminal. Prevention of subdivision of remaining sites is addressed in the Study and Strategy.
22f	Cooks River Intermodal and freight rail corridors	NSW Ports is supportive of the proposed IN1 land use prohibitions and the management of land use conflicts between employment land and residential land uses and the protection freight related land allowing the leveraging of strategic locations for freight transport and logistics.	Industrial	Support noted. EARLS Study has been updated with further analysis to support the recommendation.
31a	Marrickville	Save Marrickville fully supports Actions 3.1.1, 3.1.2, 3.1.3 and 3.1.4. Preserving industrially-zoned land and buildings is consistent with Save Marrickville's commitment to the Inner West's heritage, character and identity. We agree with the statements made in the draft that introducing residential components into employment areas can limit the ability to adapt uses in the future, for reasons including land use conflicts, and noise complaints.	Industrial	Support noted
31e	Marrickville	Strategy 1.6 - Save Marrickville is in support of encouraging the establishment of new enterprises in the Inner West. The IW is suitable for high-value niche manufacturing, start-ups and creative industries that benefit from clustering together in networks of small businesses. The IW LGA also has the necessary older industrial building stock that is often sought-after by such businesses, especially in their start-up phases, due to affordable rent, built environment factors (such as ceiling height and an ability to adapt space to project needs), and physical proximity to the city. Save Marrickville encourage IWC to partner with the State Government to explore initiatives such as subsidised rents and/or provide funding to improve infrastructure. We are also supportive of Council establishing a position of no additional permitted residential uses in employment zones such as Carrington Rd, identified in the draft strategy document as a key site.	Industrial	The draft study and actions in the draft Strategy have been updated since exhibition to address these matters in more detail.
33b	61 to 63 Victoria Rd	Residential lands have been preferenced over existing industrial business operations. New dwellings are approved by Council and are demanding greater amenity, which is in conflict with existing IN2 uses. Submission recommends to introduce an augmented zone along Victoria Road from Roberts Rd to Mullens Rd. Along parts of Victoria Road, increase height limits to allow multiple levels of industrial and increase FSR to 4:1. Introduce Co-housing as a special use. Increase availability of aged care facilities in Balmain. Introduce a buffer zone around IN2 zoned areas.	Industrial	Land use conflict challenges between industrial and residential uses are common across some precincts in the Inner West LGA due to the dense subdivision patterns and narrower streets, but should not be further encouraged. Increased FSR controls for employment zoned land require further investigation. This is outlined in the Strategy.
35a	Sydney Airport and Surrounds	Support for employment lands near airport being protected.	Industrial	Support noted. Study updated to more closely reflect the Sydney Airport Masterplan.
35b	Sydney Airport and Surrounds	Key actions to implement the Employment and Retail Lands Strategy include: <ul style="list-style-type: none"> <li>Developing an Economic Development Strategic Plan for Inner West that incorporates relevant actions from the Employment and Retail Lands Study</li> <li>Preparing planning controls to ensure that there are appropriate 'buffers' in place to minimise adverse impacts of heavier industrial uses on sensitive land uses</li> <li>Working with State Government to identify and secure new employment lands.</li> </ul> Sydney Airport supports these actions and would be pleased to work with council as appropriate when they are being implemented.	Industrial	Support noted. Study updated to more closely reflect the Sydney Airport Masterplan. Council will continue to work with Sydney Airport Corporation Limited to implement these actions.

Item ID	Location concerned	Issue/ comment	Key theme	Council Officer Response
36a, 50c, 40b, 36c		Full support for EARLS's strong signals to protect industrial and employment lands, and Action 3.1.1's clear position that there is to be no rezoning of industrial land. * A clear stance on no rezoning's of IN land is a necessary first principle for an employment lands strategy giving a clear direction and certainty to the development sector * reflects both on-the-ground empirical evidence and best practice in strategic planning thinking	Industrial	Support for strong position on retention of industrial and employment lands noted.
36b		Protecting industrial lands in the Inner West is a critical strategic planning imperative for Sydney as a whole. Overall loss of industrial zoned land in the inner-city cannot be adequately offset by provision of smaller 'creative spaces' within mixed-use developments, nor by the creation of greenfield industrial sites on the city fringe that typically house logistics and warehousing activities in large 'hanger' spaces - spaces that are inappropriate for enterprises at the creative industries /manufacturing interface. Retention of underlying industrial zoning will assist in preventing the loss of such buildings to ad hoc mixed-use value-uplift spot rezoning's, but greater recognition of the physical building stock typically found on older industrial sites is also needed. 'We recommend that the EARLS consider including a discrete Action in section 3.1, to pursue built environment/architectural documentation of older industrial buildings, their physical features that benefit different types of small-scale enterprises, and their overall contributions to the employment lands mix.	Industrial	Documentation of attributes of older industrial buildings is a resource intensive exercise that may not be able to be undertaken LGA wide. It may be worth considering for certain precincts, however, further scoping would be required to determine resources necessary to complete this task. Study will be updated to incorporate potential for documentation of building stock within the employment lands database action.
36e	Carrington Road Marrickville	Action 3.1.4 Carrington Road – support and recommendation pertaining to safety - Action 3.1.4 (to preserve and encourage innovative and creative employment opportunities in the Carrington Road industrial precinct), concurs with the research team's finding of an innovative mix of dense enterprise clusters on Carrington Road. We recommend that the Inner West Council and Carrington Road landowners lobby the NSW Government for strategic civil works funds to rectify safety issues, including flooding exposure, in order to protect existing buildings and occupants. Given the precinct's strategic economic importance for all of Sydney, such funds ought to be justified as a state significant investment (akin to the upgrading of ageing sewerage infrastructure by Sydney Water elsewhere in the vicinity in recent years). Based on the precinct's contributions to enterprise and job creation, and its facilitation role for key events, performance institutions, and creative industries for all of Sydney, the level of state investment necessary would be more than recouped indirectly in terms of GDP, wage and tax contributions within a short time frame.	Industrial	Support noted. Matters related to infrastructure servicing outside of the scope of the Study. Council is seeking discussion with Sydney Water on this issue.
36f		Incorporate greater recognition of cluster dynamics - 'We recommend that the EARLS include overt recognition of the importance of clusters, and the Inner West's already advantageous presence of clusters in creative industries and small-scale manufacturing, in either Strategies 1.5 or 1.6.	Industrial	University has already identified a number of these clusters, which will be incorporated into the Study. Council will continue to work with the Economic Development Team to identify existing and evolving clusters.

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36g		<p>Revisit industrial categories, acknowledging the interface between creative industries and manufacturing, and enterprise interactions between sectors</p> <p>'Specific recommendations:</p> <ul style="list-style-type: none"> <li>- Extract calculations of manufacturing employment from the 'other' (45.6%) segment of the horizontal bar graph, and combine it with 'arts/creatives' into a distinctive category, 'creative-manufacturing', to recognise the hybrid and interlinked nature of these sectors in the Inner West.</li> <li>- Consider incorporating an additional dot-point under 'Influences/Industry and market trends – Industrial' that recognises that in the Inner West, creative industries and manufacturing have become entwined sectors, and that industrial activities are increasingly high-value-added, tied to niche production, limited batch runs, and a combination of manual, creative and digital work.</li> <li>- In the same section, under 'creative sector', there is an opportunity to reiterate that the need to retain creative spaces in the Inner West depends upon IN1 and IN2 zoning. Protecting industrial zoning (IN1 &amp; IN2) is absolutely critical if the Inner West is to succeed in seeking to grow its reputation as a leading creative and cultural hub. This is in part because of the function provided by industrial-zoning in maintaining affordability of available space, but also for very practical reasons concerning permissible uses (power tools and chemicals in theatre set building, sculpture, woodworking; noisy equipment e.g. music rehearsal studios) and suitable loading bays with street access – more typically found in industrially-zoned spaces.</li> <li>- We also recommend revising the map under Strategy 1.2: it currently differentiates between 'creative (C)', 'industrial (I)', and 'urban services (U)' functions, labelling Carrington Road as 'C', and the Sydenham-Marrickville precinct with C, U, and I.</li> </ul> <p>Both precincts would be more accurately described as housing hybrid creative industry-manufacturing clusters. If the C/U/I categories must be used, then Carrington Road should also be labelled with I, and U to reflect present industrial/manufacturing activities (e.g. small-scale creative-manufacturing, food processing), and urban services functions (e.g. auto repair and maintenance). Otherwise, the risk is that landowner/developer interests seeking to rezone parcels could propose mixed-use developments with (minimal) provision of 'creative spaces' seemingly consistent with the map's 'C' indicator, but actually losing IN zoning, and conversion of most of the buildings and floor space for residential and retail purposes.</p>	Industrial	Support for retaining industrial lands and of their importance to creative and other industries as a cluster is noted. Council has reviewed the specific recommendations and made changes within the Study where appropriate. Analysis within the Draft Study has been updated considerably to ensure there is adequate explanation and substantiation of the actions/recommendations.
40b		<p>Front yard is encouraged by the IWC's recognition of the importance of industrial space to creative industries. The research team fully endorses the strategy's position that industrial land in Sydenham and Marrickville should be protected for industrial use, not for residential rezoning. We fully support EARLS's stated commitments to protect existing industrial land (Actions 3.1.1-3.1.3); establish a pipeline of industrial and urban service land (Strategy 3.2); implement a council-run industrial land supply monitoring system (Action 3.2.1), and investigate long-term expansion options for industrial land (Action 3.2.2). Action 3.1.2 that there is to be no residential development in IN lands. A diversity of land uses is essential to a thriving creative community. Protect areas through zoning within Industrial areas where people can rent small spaces e.g. office space, wood working, jewellery and fashion.</p>	Industrial	Support for protection of industrial lands for creative industries and protection from residential noted.
44a		<p>There is a great opportunity for multi level light industrial spaces. This would be a great way of preserving the industrial nature of the area. It would also allow for increased return to land owners and reduce the pressure to convert into residential.</p>	Industrial	Amendments to FSR controls need careful consideration and cannot be amended without supporting evidence based studies. Study flags review of floor space ratio controls within employment precincts.

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47a	Balmain, Rozelle and Lilyfield	I have seen Council destroy business in the area by continuing to approve residential on Zonings that are not allowed. This encourages developers to buy more industrial land to convert to residential because Council is constantly allowing residential development on Industrial land in Balmain/Rozelle/Lilyfield. Many areas of Industrial lands are owned by residential developers who will not give anyone a proper lease and many are on demolition clauses. Some developers are willing to leave sites vacant to prove their point that the sites cannot be viable for light industry /bulky goods. But this is untrue. The area is crying out for these sites and the building of West Connex has only exasperated this issue, as they bought many industrial sites and demolished them. Many industrial tenants all believe they are on borrowed time as these areas want them out to slowly make them residential. My own business is to be evicted due to apartment development and we cannot find a building to relocate.	Industrial	The Study identifies the need for no further rezoning of industrial land to provide market certainty for landowners and tenants. It is noted a number of sites have been rezoned in the past from Industrial to residential/mixed-use and they are yet to be redeveloped. As a result, it is noted that a number of these industrial properties are unlikely to offer long term leases due to future redevelopment intent. The EARLS, in line with the Eastern City District Plan, aims to stop the further rezoning of industrial lands where the retain and manage approach applies. Note however, that planning proposals commenced prior to the release of the District Plan are assessed with that timing in mind.
47i		Concern that industrial and employment lands currently are too small or being used by tenants that do not employ people such as storage centres and churches. If you are to rezone as per the draft the ground floor ceiling heights must be 6m internally! A business cannot work without this height. This relates to truck and container deliveries and efficient use of the space with pallet racking etc. . It can also be mezzanine for offices above showrooms etc. , and later returned to a clear space. This allows these spaces to be integrated rather on separate levels and not interfere with the residential amenity. It would also allow for a range floor plates for business. Successful local business need large floor plates, 500 to 1500m2. And you must not allow use that don't employ people ! This means storage centres and church. These uses do not activate the area as they don't have staff and are closed for most of the time.	Industrial	The State Government mandates certain uses in these zones, including places of public worship and storage premises. The draft study has been amended to provide stronger analysis and substantiation for providing suitable spaces for a wider range of employment uses (other than retail) outside of Industrial areas.
60a	the Bays precinct	Support the opportunity to undertake a strategic review of industrial land in light of the new Metro West Bays Precinct train station and recognition of the Bays Precinct as an major transformation area.	Industrial	White Bay Industrial precinct section of the Study has undergone revision and to consider the range of submissions received on this matter.
67d	Sydenham Station and Sydney Metro Train Facility South	The EARLS highlights the absence of height limits applying to the majority of the Marrickville-Sydenham Employment Precinct, with reliance on FSR as the only development standard guiding the built form outcomes within the area. Sydney Metro would like to highlight that height limits are applicable in this instance as the Civil Aviation Safety Authority's (CASA) Obstacle Limitation Surface (Obstacle Limitation Surface (OLS)) exists above the subject residual land holdings. As this airspace is required by CASA for aircraft operations under the Commonwealth Airports Act 1996, this airspace must be protected and therefore restricts the built form outcomes on site. Accordingly, maximum storeys achievable under the OLS range from 6 storeys in the west and up to 13 storeys towards the eastern part of the site.	Industrial	The draft study has been amended to reflect the height limits in this area due to the CASA's requirements for safe airspace.
36h		Revision of statement regarding automation - 'Under 'Influences/Industry and market trends – Industrial', the EARLS states 'Automation of industries resulting in fewer jobs but continued need for land and floor space'. While this may be true for some large-scale manufacturing (assembly lines) and transportation (e.g. automated ports), the impacts of robotics and automation on small-scale manufacturing and industrial activities within the Inner West has been negligible, and is unlikely to be significant in the future. We recommend nuancing this statement to differentiate between the impacts of automation on large-scale industrial processes (closer to the airport), and the forms of creative-manufacturing that typify activity in the Sydenham-Marrickville, Carrington Road and other precincts.	Industrial	The Study has been amended to acknowledge that large scale automation assembly may be less likely to displace jobs in the Inner West given the small-scale nature of businesses and land/building size in the LGA.



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35c	Sydney Airport and Surrounds	Sydney Airport believe a specific action should be included to recognise the need to protect Sydney Airport's long-term operational role and efficiency. This could be achieved by including a specific reference to the National Airports Safeguarding Framework (NASF) and its guidelines. Proposed new action under Action 9.1 to read as follows: • Protect the long-term operational role and efficiency of Sydney Airport from inappropriate development by recognising and giving effect to the National Airports Safeguarding Framework.	Infrastructure and transport	Actions revised to reflect feedback from Sydney Airport Corporation Limited.
02b	Land within the block of Robert St, Mullens St and Mansfield Rd, Rozelle	Concern for oversight of the potential for the subject site in the consideration of the Metro station. The site has potential for a greater diversity and extent of business and employment opportunities. Figure 1 of the study, 'Study Area and Strategic Context' should nominate these key planned and committed to transport corridor extensions and train stations, including the new Metro West station; and this should be recognised as a key influence in scoping the future of the employment land throughout the Strategy. Similarly, Balmain and Rozelle section in Part E should highlight the subject land as opportunities due to the new Bays precinct metro station.	Infrastructure and transport	Site referred to is currently zoned IN2 - Light Industrial and part of White Bay Industrial precinct, identified as being of strategic importance in this Study. Strategy aims to protect industrial land from rezoning and this is also applicable to White Bay Industrial. The future Metro station will support substantial redevelopment within the Bays Precinct proper, and the retention of industrial zoning in this precinct will enable the provision of urban services within reasonable proximity of the transformation area.
15b		Kaufland supports actions aimed at calming traffic.	Infrastructure and transport	The Study has been amended with further substantiation on relationship between main roads and adjacent land uses.
22c	Cooks River Intermodal and freight rail corridors	Freight connections need improving. Action 8.1 could be expanded further to include supporting and advocating to State Government to reinstate access ramps at Canal Road, St Peters to the design of Sydney Gateway prior to construction.	Infrastructure and transport	The Environmental Impact Statement (EIS) for Gateway was on exhibition in early 2020. Council prepared a submission which advocated for the provision of a Cooks River Intermodal freight access ramp. Advocacy will continue in relation to this matter into the future.
31g	Marrickville	Action 4.1.2 - Save Marrickville requests that the community be consulted early in any plans to leverage the delivery of Sydney Metro at Marrickville and Dulwich Hill. Action 4.1.7 - Save Marrickville is fully supportive of Council securing remaining land from the State Government after infrastructure projects are completed. We would like to see this land brought back (and remain) in the public domain.	Infrastructure and transport	Support noted
33c	61 to 63 Victoria Rd	Traffic management planning on Victoria Rd by State Authorities have made it impossible to stop a vehicle or unload from Victoria Rd, forcing all deliveries to come down Loughlin St which is very narrow and has residents on its western side. Several years ago, Council advised us that trucks can no longer be turned around in Loughlin St (Annexure A) which effectively means they have to reverse back onto Victoria Rd which is clearly impossible. In effect we have an industrial site without truck access. Residential parking is encouraged in Loughlin St through the parking permit system. This often means that truck and large vehicles servicing IN2 Land have nowhere to park, and they are forced to unload from the middle of the road. This is another example of residential amenity taking priority over IN2 functionality. o Access to Victoria Rd from Loughlin St during the morning peak hour is not permitted. This further restricts the use of the land. o Council traffic management obstacles, designed to prevent vehicles accidentally mounting the curve combined with residential parking on the corner of Brent and Loughlin Streets, have further reduced access.	Infrastructure and transport	Land use conflict challenges between industrial and residential uses are common across some precincts in the Inner West LGA due to the dense subdivision patterns and narrower streets. These lands are still capable of supporting thriving businesses however there are some locations that cannot support larger vehicles. Council is cognisant of these issues and will continue to work with residents, businesses and the Transport for NSW. An action has been developed within the EARLS to acknowledge these issues.
43c	motorways	On page 18 of the Strategy (under the headline 'Influences and then 'Transport'), a dot point says "New motorway infrastructure improving accessibility and relieving traffic congestion. Inner West Council has strongly opposed urban motorways saying they create instead of improve congestion, and I suggest this dot point be deleted.	Infrastructure and transport	The discussion in the EARLS should be amended to reflect access to motorway network rather than relieving traffic congestion.

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50g, 65d		Have sufficient cross suburb public transport so that workers don't have to drive.	Infrastructure and transport	The provision of public transport is managed by the State Government, through Transport for NSW. Council's position on public transport matters is considered in detail in the adopted Integrated Transport Strategy available on Council's website.
67a	Sydenham Station and Sydney Metro Train Facility South	As a result of design development of the Sydney Metro Train Facility South since the approval of Modification 4, sufficient residual land at grade has been identified post-construction of the rail infrastructure. This land within the EARLS has been identified as 'employment land lost to Sydney Metro'. Sydney Metro considers the three residual land holdings, having a total site area of approximately 30, 000 square metres, as an opportunity to relieve the loss of employment land to the local government area (LGA).	Infrastructure and transport	EARLS Study refers to the retention of the site for employment land. A planning proposal would be required to consider the expansion of permitted employment uses.
34d	Parramatta Road	Optimising the significant transport and land use potential of Parramatta Road (a strategy which may achieve a significant and much earlier contribution to Council's housing and employment targets) is desirable.	Infrastructure and transport	This will be addressed in future Parramatta Road Place Based Study as foreshadowed in the recommendations of the revised EARLS Study and Strategy.
39a	Motorway	On page 18 of the Strategy (under the headings 'Influences' and then 'Transport'), a dot point says ""New motorway infrastructure improving accessibility and relieving traffic congestion. Inner West Council has strongly opposed urban motorways saying they create instead of improve congestion, and I suggest this dot point be deleted.	Infrastructure and transport	The discussion in the Strategy should be amended to reflect access to motorway network rather than relieving traffic congestion.
60c		Support growth in economic development in areas well connected to public transport such as the new Metro West station	Infrastructure and transport	White Bay Industrial precinct section of the Study has undergone revision and considers economic development near the future Metro station.
36d		Full support for action 3.1.3 - Establishing minimum lot sizes is vital to prevent fragmentation and loss of the integrity of industrial precincts, and especially their capacity to house dense clusters of diverse firms who form links across sectors. Our geospatial mapping work demonstrates that over time, gradual fragmentation and convers assist in preventing this, and thus enable the spatial integrity and full potential for enterprise and job growth within industrial precincts to be maintained. It will also enable strategic planning to guide the evolution of those districts, rather than ad hoc, opportunistic, processes.	Lot size - employment lands	Support for minimum lot sizes for industrial lands noted
31b	Victoria Rd Rozelle	Introduce a minimum lot size of 2,000sqm for industrial land to encourage consolidation.	Lot size - employment lands	The appropriate minimum lot size can be determined for different areas as part of a future LEP.
22d	Cooks River Intermodal and freight rail corridors	NSW Ports supports Action 3.1.3 (Establish a minimum subdivision lot size (including restricting strata subdivision) of 10,000 sqm in IN1 zone to minimise property fragmentation). This policy position of Council in the Employment and Retail Lands Strategy is critical for industrial lands. NSW Ports supports the Principles in relation to subdivision to preserve industrial lands.	Lot size - employment lands	Support for action noted. Study has been updated with further analysis to support the recommendation.
41c, 65c		Inner West Council should be encouraging low emissions development everywhere throughout the LGA. Planning Agreements could be used throughout. Requiring high NABERS ratings could be a place to start. Similarly, increased green-space, water efficiency and water capture on site for non-potable uses should be encouraged.	Miscellaneous	Beyond the scope of EARLS.
54g		Callan Park is a superb resource with derelict buildings left to rot we could make that into a bicycling hub for both business and recreation. with cafe's, Co-Work offices and warehouses, as well as a dedicated off road track for kids and mountain bikers so we could create a destination to attract people in from both within and outside of the LGA.	Miscellaneous	Callan Park has legally binding State Government restrictions on the range of uses that can be permitted. The Study has been updated to provide discussion of opportunities that Callan Park can provide under its existing framework.

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06a		Employment lands along Parramatta Road are next to the Camperdown Ultimo Collaboration Area. These are also investigation areas for additional housing (shop top and residential). There is a conflict in this desired strategic outcome. Avoid competing land uses in Camperdown Ultimo.	Miscellaneous	The precinct profiles for Camperdown have been updated. It is not proposed to transition employment land to housing.
49b		The buildings below Marrickville station or on South Kings Street Newtown, the art deco former mechanical and service station and terrace houses, have been purchased by developers who removed tenants and have left the buildings vacant and in decay. What are the plans for these buildings and why are the developers allowed to leave them in this state of ruin and disuse?	Miscellaneous	Matter beyond the scope of the Study. Strategy designed to support the ongoing generation of town centres including King Street and Marrickville Town Centre.
34b	Parramatta Road	Council officers will be aware that the environmental quality of Parramatta Road has and will continue to improve dramatically as a result of reduced traffic, programmed public domain enhancements and following recently completed + planned "WestConnex" road tunnels. Parramatta Road will also accommodate fast bus services to the City. A balanced mix of land uses along the highway, including residential uses, is appropriate to provide an incentive for redevelopment of existing unsightly commercial buildings, removal of signage "clutter" and to encourage relocation of "low value" commercial uses such as storage uses and car yards employing limited numbers of people. Many sites fronting Parramatta Road are under-developed yet are much larger than standard low-density residential lots. If these properties are "incentivised" via mixed use rezoning, they will likely be redeveloped much more quickly in contrast to proposals for rezoning of low density R2 zones which may generate significant and ongoing resident opposition. Mandating a minimum FSR for business uses as part of "incentivised" mixed use development proposals will achieve employment targets earlier than would otherwise be the case. Light industrial and retail uses can also happily co-exist with shop-top housing.	Mixed use	Background study includes detailed consideration of Parramatta Road Corridor Urban Transformation Strategy (PRCUTS). The EARLS includes an action to undertake a feasibility study into maximum building height and floor space ratio (FSR) controls along Parramatta Road. This will be part of the future Parramatta Road Place Based Study as foreshadowed in the recommendations of the revised EARLS Study and Strategy.
34c	Parramatta Road	Appropriate development standards can be applied to appropriately manage the interface of taller mixed-use developments and adjacent low-density residential zones + heritage conservation areas located near Parramatta Road. Limiting the bulk of buildings contextually to respond to surrounding built forms (appropriate height and FSR controls are included in the current Ashfield LEP) is desirable.	Mixed use	Will be addressed in future Parramatta Road Place Based Study as foreshadowed in the recommendations of the revised Study and Strategy.
38f		Strategy should better recognise and encourage mixed use development and appreciate the full array of benefits that can be provided, such as improved livability, delivery of a 30-minute city and better health outcomes for residents.	Mixed use	The benefits of mixed use development, providing dwellings within centres is discussed in the Trends and Influences chapter within the Study.
47f		Concern regarding apartment developments pushing out anchor tenants in industrial and commercial spaces leading to loss of activation - gives multiple examples. Minimum 40-50% of FSR with 6m ceiling heights. Look at what CSR have done in Pyrmont opposite the fish markets is a perfect example. Not everyone wants to live above a bar, supermarket, restaurant and not every development can support these businesses under every apartment block. Look at all the dreadful ground floor apartments around or boarded up small shops. You need proper businesses to activate a strip and area. Look at what has happened to Rozelle with the loss of The Essential Ingredient! Its dead. It has affected Balmain Rd as it was an anchor tenant but is lying vacant because of a apartment development. Other e.g.: old panel beater on Balmain Rd; Roche building opposite Callan park. These all have a demolition clause and only short term lease available because they want to build apartments on industrial land.	Mixed use	Objections to residential development in industrial areas noted. The EARLS has been amended to detail the rationale for suitable ground floor employment floor space with detailed case study on Pyrmont site referred to in the submission.
46a	Dulwich Hill	Support a vibrant night time economy. Need to be safe places at night with good public transport later in the evenings and negatively impacts on nearby residents	Night-time economy	Night Time Economy section of Study updated with more detail. Actions revised in EARLS.

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46b	Dulwich Hill	Encourage businesses to open after hours – but not at the loss of employee working conditions e.g. meal breaks, penalty rates	Night-time economy	Night Time Economy section of Study updated with more detail. Actions revised in EARLS.
47d		This all affects the High st and so called" night time economy". If the day time economy's not good , and it isn't, there are no people to go out after work because there is no work! The day time economy adds to the High St. People who work here buy food , groceries , clothes and stay after work.	Night-time economy	The Study has been updated and actions in Strategy revised to address how to better support both the daytime and night time economies of centres across the Inner West.
66b		The evidence base on which the policy for the night-time economy and the creative industry and cultural infrastructure sector (the Sector) is based needs further detail and analysis. This includes the need for: 1.A more detailed characterisation of the current 'state of play' for the Sector; 2.A more detailed analysis of the future needs, opportunities, barriers and challenges facing the development, viability and sustainability of the sector 3.A more detailed suite of policy and solutions including analysis of alternatives and pro-active policy like the proposed 'Agent of Change' policy.	Night-time economy	Additional analysis has been drafted within the Study as it relates to night-time economy, including the 'agent of change' principle. Council's City Living unit is currently undertaking further studies in relation to community and cultural infrastructure.
66e		Century Venues strongly supports the collaborative development of LEP and DCP provisions that respond to the specific needs of venues, live entertainment, performance and music in all its forms, and would appreciate the opportunity to talk further with Council about these issues, barriers and future needs. Specific DCP provisions will be of relevance across the LGA, but should be place-based so that they address the specific local needs of cultural infrastructure and creative industries across the mosaic of local places in the Inner West.	Night-time economy	Support noted. Further analysis and substantiation of actions relating to agent of change and supporting the night time economy has been prepared.
66g		Century Venues seeks Councils specific attention in this regard to the pedestrian and cycling journeys to and from Sydenham Station, particularly with regard to safety and illumination at night. As part of encouraging sustainable transport options the Factory Theatre at Marrickville seeks to encourage patrons to use public transport and walk from Sydenham Station. The route is currently uninviting and poorly lit, a situation that deters public transport usage, and is not appropriate to the Precinct that is intended for development as an artistic hub.	Night-time economy	Recommendation drafted for the Precinct Profile in relation to this.
02a	Land within the block of Robert St, Mullens St and Mansfield Rd, Rozelle	Diversity of land use and Housing Growth: highlighting contradiction between pg 17, about the increasing demand for residential uses in centres and employment precincts and the direction and action 5.1.1. that no additional residential uses in employment areas should be permitted. Rather than a prohibition, we consider that housing and other like uses should be open to being assessed on an environmental merits based assessment allowing for flexibility into the future.	Non-employment uses in employment zones	Site referred to is currently zoned IN2 - Light Industrial and part of White Bay Industrial precinct, identified as being of strategic importance in this Study. Strategy aims to protect industrial land from rezoning and this is also applicable to White Bay Industrial. The future Metro station will support substantial redevelopment within the Bays Precinct proper, and the retention of industrial zoning in this precinct will enable the provision of urban services within reasonable proximity of the transformation area.
50f, 46d, 54f, 58a, 65b		Parking around business is crazy. This is because residences are not forced to accommodate off street parking so now all householders park on the street. So during business hours the streets are clogged even if residents are at work elsewhere. Have sufficient off street parking for workers and customers, will stop residential parking being used and resentment from house owners. Let's avoid the fate of Leichhardt restaurant district destroyed by parking meters!	Parking	Council will seek an appropriate response to parking in local centres. Parking addressed briefly in EARLS. Council's formal strategic direction with regard to Parking is detailed in the Integrated Transport Strategy.

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41c, 65c		Council will provide room for outdoor dining, events, markets, street trees and public domain improvements by widening footpaths or removing parking spaces in appropriate places." – this sounds wonderful – particularly increasing street trees. Our town centres could do with a lot more green-space (especially Ashfield). IWC should be encouraging low emissions development everywhere throughout the LGA. Voluntary Planning Agreements could be used throughout.	Public domain	Support for public domain improvements noted. Discussion in Draft Study updated to strengthen recommendations
42a 43b		I'm supportive of the street being built up, but am concerned that there have been missed opportunities with all the development occurring. For example I believe street trees should have been conditioned on development applications on both sides of the road. We are lucky to have trees shading footpaths on the local side streets, but trees on the main road could have such a positive environmental impact. Small traditional retailers (chemists, bakery, clothing, etc.) as well as cafés, restaurants and takeaway food services think reduced car parking will threaten their business however Australian research has shown that business owners often over-estimate the proportion of customers who drive to access their business. The use of Business Improvement Districts in the USA has shown that, after experiencing street improvements such as attractive footpaths, street furniture, trees and lighting most businesses realise the benefits. This is because the area is more attractive to visit and stay longer, walk further, people can still drive to the area and park within a short walking distance.	Public domain	Refer to action relating to working with the State Government on the 'Movement and Place Framework,' which is crucial if amenity of centres placed on main roads is to be improved.
42c	New Canterbury Road	New Canterbury Road is extensive, but I believe there should be a plan or overriding principles that guide future works and DAs at least between Herbert Street and Old Canterbury Road. Some parts have planter boxes, some parts have trees, some parts have tiled footpaths, some parts have fences.	Public domain	The Study has been updated with further analysis and recommendations to respond to these issues.
42d	New Canterbury Road	New Canterbury Road (Dulwich Hill West in the Strategy) and the number of empty shop fronts is depressing. I'm also concerned about the amount of ground floor street facing properties that are being used for residential purposes. There are so many new residents now and it's only increasing with more residential buildings going up, so the demand for street activation is there. And what better way to attract businesses to the area than to have an attractive street. I understand the street has complex ownership, including Inner West Council, Canterbury Bankstown Council and RMS. Both Inner West and Canterbury Bankstown have collected developer contributions over the past few years and continue to collect rates from the many residents living in apartments. The residential buildings erected in the Dulwich Hill West precinct are built with commercial / retail ground floor spaces yet some have been empty for as long as I have lived there. I understand with increased demand, businesses may come. However Council needs to incentivise developers and landlords to fill their retail and commercial spaces rather than leaving them empty.	Public domain	Council to consider preparation of a study for the B6 enterprise corridor and centre zoned lands in Dulwich Hill to better understand the interrelationships, and actions required to improve New Canterbury Rd, and ensure the economic health of the employment and retail lands into the future.
46c, 50c	Dulwich Hill	Stop encroachment on Green space, build more pocket parks, with gathering places for people to socialise without spending money. Wind tunnel effects discourage shoppers.	Public domain	The EARLS acknowledges the role of green space, pocket parks and gathering places as beneficial additions to a number of centres within the Inner West.
46g	Dulwich Hill	Ashfield Town centre: desperately needs greening. Its hot, dusty and feels grubby.	Public domain	Ashfield has undergone a recent public domain upgrade. Study signals the need to continue this program. Refer to action relating to working with the State Government on the 'Movement and Place Framework,' which is crucial if amenity of Liverpool Road is to be improved. Actions in EARLS strategy relating to public domain have been expanded.

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01h	Marrickville Metro	The finalisation of the draft strategy should consider the land use of the expansion site. Given the expansion of the shopping centre is well under construction with a proposed opening date in 2020, it is logical to rezone 13-55 Edinburgh Road to B2 – Local Centre.	Rezoning request	The expanded area has been considered in the strategy in line with the 3A concept plan. Any rezoning for the site will be subject to consideration in a future planning proposal.
02e	Land within the block of Robert St, Mullens St and Mansfield Rd, Rozelle	We also consider there should be an action to review the zoning and other planning provisions relating to the subject land in light of the directions to leverage off significant infrastructure investment and key policy directions to enhance employment opportunities into the future.	Rezoning request	The future Metro station will support substantial redevelopment within the Bays Precinct proper, and the retention of industrial zoning in this precinct will enable the provision of urban services and a diversity of employment opportunities within reasonable proximity of the station.
03a	Mullens Road Industrial Precinct	Shop top housing and residential flat buildings are identified as appropriate close to Boral's plasterboard site on Robert Street	Rezoning request	Refer to White Bay Industrial Precinct Profile for specific discussion of land use conflict challenges. Actions in the Strategy are updated in relation to land use conflict.
05a	St Joseph's Catholic Church and surrounding properties	Planning scheme should allow for the Archdiocese to develop their site.	Rezoning request	The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. Such a rezoning would require the lodgment of a planning proposal.
09a	2-10 Gerald Street and 118-130 and 132-134 Marrickville Road, Marrickville	Residential and more diverse employment uses should be supported in industrial areas to account for residential demand and changing industry. The site should be rezoned from IN1 to IN2 with residential flats as an additional use, increase the maximum FSR from 0.95:1 to 3.5:1.	Rezoning request	The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. Such a rezoning would require the lodgment of a planning proposal. EARLS has a defined position on industrial to residential/mixed use rezoning, that is consistent with the 'retain and manage' approach in the <i>Eastern City District Plan</i> .
10b	7 Cooper Street, East Balmain	The site's current IN2 Light Industrial land use zoning is not consistent or compatible with the residential land uses in the immediate surrounding area. This submission proposes that the draft LSPS is amended to acknowledge that site-specific residential planning proposals for land not identified in the Local Housing Strategy can be considered in certain specific circumstances i.e. 7 Cooper Street, East Balmain.	Rezoning request	The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. Such a rezoning would require the lodgment of a planning proposal. The EARLS position on industrial to residential/mixed use rezoning is consistent with the 'retain and manage' approach in the <i>Eastern City District Plan</i> , recognising the extent of loss of industrial land in the district over the last 20 years, and the need to protect industrial lands to support shorter supply chains and urban services.
12a	40 Henry Street, 267 - 277 and 265, 263, 257, 255, 253 Norton Street, Leichhardt.	Current zone doesn't suit the site and projections are understated. There is a need to ensure appropriate locations are rezoned for housing development, and this site is appropriate for this.	Rezoning request	The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. Such a rezoning would require consideration as part of a planning proposal.
13a	118-130 & 132-134 Marrickville Road and 2-10 Gerald Street, Marrickville	Residential and more diverse employment uses should be supported in industrial areas to account for residential demand and changing industry. The site should be rezoned from IN1 to IN2 with residential flats as an additional use, increase the maximum FSR from 0.95:1 to 3.5:1.	Rezoning request	Site-specific rezoning a matter for proprietor and Council. EARLS has defined position on industrial to residential/mixed uses, that is consistent with the 'retain and manage' approach in the <i>Eastern City District Plan</i> .

Item ID	Location concerned	Issue/ comment	Key theme	Council Officer Response
21a	Carrington Road Marrickville	<p>EARLS vision for Carrington Road Marrickville is inconsistent with what HillPDA advised in Mirvac/Arup report in July 2018. In relation to East Carrington Road, the current draft Strategy:</p> <ol style="list-style-type: none"> <li>1. Inhibits the protection of ongoing affordable workspace for tenants and does not secure the future of the creative industries on the site;</li> <li>2. Does not grow employment or increase local employment;</li> <li>3. Does not encourage or unlock innovation and productivity growth; and</li> <li>4. Does not release resources to address the significant flooding threat.</li> </ol> <p>Our recommended changes to the Strategy are:</p> <ul style="list-style-type: none"> <li>- Amend Action 3.1.1 to say following: "Proposals which seek to rezone industrial land should only be considered where they meet a strategic merit test."</li> <li>-Amend Action 3.1.3 to remove restrictions to strata subdivision on industrial land.</li> <li>- Amend Action 5.1.1 to delete Carrington Road from the list of sites to have no additional permitted residential uses.</li> <li>- Amend the size of Carrington Road Industrial Precinct (Table 5, page 35) to say 60,249 square metres.</li> </ul>	Rezoning request	<p>Carrington Road Marrickville is a key general industrial precinct in Inner west, and in the District. It is one of the few large precincts remaining, and one of the few that has large sites (relative to its location close to the city). It has also developed into cluster where the variety of industries support each other.</p> <p>Refer to revised Study and Strategy, including replacement action for Action 3.1.1, 5.1.1. The Action relating to strata subdivision is intended to prevent fragmentation of last remaining large industrial sites in the Inner West. The Strategy is clear with its intention to retain a diversity of industrial sites.</p> <p>Council is happy to continue to work with the proponents to resolve flooding and other issues to ensure that these lands play a continuing industrial and creative role into the future.</p>
24a, 25a	6 Bolton Street Sydenham, 19 Unwins Bridge Road, Sydenham	Industrial area in Sydenham should be considered for other forms of employment (office) and residential (short term visitor accommodation and short term affordable housing)	Rezoning request	<p>The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. EARLS position to retain and manage industrial land is consistent with the Eastern City District Plan, and recognises the importance of these industrial lands to the trade gateways.</p>
26a, 27a	27 and 31-35 Unwins Bridge Road, St Peters	Industrial area in Sydenham should be considered for other forms of employment (office) and residential (short term visitor accommodation and short term affordable housing)	Rezoning request	<p>The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. EARLS position to retain and manage industrial land is consistent with the Eastern City District Plan, and in recognises the importance of these industrial lands to the trade gateways.</p>
28a	170 Lilyfield Road, Lilyfield	Current controls limit redevelopment. Initial planning is for a 200-600sqm neighbourhood supermarket. Recommendations to alter planning controls.	Rezoning request	<p>The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. A planning proposal would be required to consider an alternative zoning.</p>
32a	2-10 Gerald Street and 118-130 and 132-134 Marrickville Road, Marrickville	Site rezoning to generate mixed use precinct. The site should be rezoned from IN1 to IN2 with residential flats as an additional use, increase the maximum FSR from 0.95:1 to 3.5:1	Rezoning request	<p>The EARLS takes a broader strategic approach. It is not a tool for site specific rezonings. Such a rezoning would require the lodgment of a planning proposal.</p> <p>EARLS has a defined position on industrial to residential/mixed use rezoning, that is consistent with the 'retain and manage' approach in the <i>Eastern City District Plan</i>.</p>

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37a	5-15 and 30-32 Murray Street and 11 Edinburgh Road, Marrickville	<p>Council's strategy for the whole of Precinct 39 should be updated to better reflect the strategic importance and significance of the Metro Storage site as part of the transformation to a true town centre over the next 10-20 years which is connected to easily and safe walkable railway stations at Sydenham and St Peters.</p> <ul style="list-style-type: none"> <li>• To better reflect the strategic importance and significance of the Marrickville Metro and Metro Storage sites as part of the transformation of the area into a true town centre; and</li> <li>• To direct that the IN2 Light Industrial Zone (or similar) should be applied to this precinct having regard to its physical isolation from the Sydenham Employment Area and which would offer a more suitable transition to the neighbouring business and residential land uses as part of the emerging town centre precinct; and</li> <li>• That the IN2 Light Industrial Zone facilitate creative industries and urban support services consistent with the strategy.</li> </ul>	Rezoning request	The importance of retaining IN1 - General Industrial zoned land has been discussed in detail in both the Study and Strategy. The Strategy also provides a number of recommendations including the investigation of planning controls to protect, expand and adapt to evolving and changing industries. This will be developed as part of Inner West's comprehensive LEP and DCP.
63a	Lilyfield	<p>Key employment lands and gateway sites need to take into account the realities of the current and likely future land use. The area along the northern side of Lilyfield Road between Halloran and Ryan Streets is currently zoned for industrial uses. The present reality of this areas is that it consists of relatively new buildings which are designed and built to be used as work from home dwellings.</p> <p>These properties should be rezoned to comply with their reality. In other parts of the municipality these properties would be zoned residential.</p>	Rezoning request	Development referred to was approved by the NSW Land and Environment Court. EARLS does not currently recommend this site be rezoned. The future zoning of the B7 - Business Park zone (the relevant zone for the land being described in the submission) will be addressed in future stages of Council's LEP review.
47e		<p>Concern regarding the negative impacts on industrial and employment use from residential being built in industrial zones.</p> <p>We have seen a huge drop in working people on the Peninsula , be it blue collar and office. One day you will have to get your car repaired in Wetherill Park and have to buy furniture in Auburn. The Chamber of Commerce conducted a survey 10 years ago and top of the list for services was bulky goods in the area. Yet council has continued to approve residential in Industrial s zoning's in Rozelle. Businesses are told they cannot drive trucks down streets off Victoria to access there work even though they are zoned Industrial because of residential that has been allowed to be built. If any residential is to be approved it must be with Industrial/ Commercial .</p>	Urban services	Objections to residential development in industrial areas noted. Matter addressed by recommended policy position to retain employment land.
48a		Services for repair of all kinds are important, not only vehicles. They reduce landfill, and help maintain long term relationships of care between people and the things they use.	Urban services	The EARLS aims to protect lands for urban services.