

**Submissions/emails received after the Public Forum on 22
September as members were not able to speak at the
Public Forum.**



From: Francis Torok
To: Council Meetings
Subject: Re: Application to speak at a meeting
Date: Wednesday, 24 September 2025 8:43:13 PM

Dear Inner West Council,

I'm writing to support the Fairer Future plan and proposed upzoning.

I don't currently live in the Inner West, but I would love to in the future. Right now, housing affordability makes that almost impossible. Allowing more medium-density homes near transport and services is essential to give more people a chance to live here, ease pressure on rents and prices, and keep the Inner West accessible to a diverse community.

Please be ambitious with upzoning so the Inner West can stay welcoming and affordable for future residents like me.

From: Jonathan Joseph
To: Council Meetings
Cc: Wil Nino; Caitlin Young
Subject: RE: Application to speak at a meeting - 2-18 Station Street, Marrickville
Date: Wednesday, 24 September 2025 1:37:32 PM

Dear Sir/Madam,

We recently registered to address the Public Forum on Monday 22 September as it related to the Inner West Fairer Future Plan. However, given the capacity was reached, we could not speak at the public meeting.

We act on behalf of our client, Emag Apartments, who are a prominent affordable housing developer in the Sydney Region and owner of Nos. 2-18 Station Street, Marrickville. Provided below is a summary of the submission prepared by Planning Ingenuity (dated 1 July 2025) for the IWFFP, which is attached for reference.

As it pertains to the subject site, Council in their Engagement Report stated that the density of the site under the current planning controls was appropriate, and any uplift in density should not be considered. This is in our opinion considered to result in an inferior planning, strategic and urban outcome, for the following reasons:

- The subject site is located 10m from Marrickville Railway Station and is located within the Town Centre. The site and surrounds in the E1 Local Centre zone are easily capable of accommodating an uplift in density;
- The properties directly to the east, which are zoned R4 High Density Residential, are permitted an uplift in density equating to 3:1 and 34.3m, which can be increased to 3.78:1 and 40.7m including bonuses afforded by the Housing SEPP. This is greater than that permitted on the site, and will result in an incoherent response to density centric to the local centres, where the residential zones will have a greater density than that permitted within the E1 Local Centre zone. In this regard, the site and E1 zone should be allowed for a greater increase to deliver a cohesive urban pattern;
- The developer is committed and capable of delivering housing in the near future, evident by the current approvals on the subject site; and
- The site is located at a prominent location and is capable of redevelopment in the short term.

Ultimately, exclusion of the site and surrounding E1 Local Centre zone from any uplift is a missed opportunity. In this regard, it is requested that the site:

- Maintain its current zoning;
- Increase building height to approximately 45m;
- Increase FSR to approximately 6:1;
- Include other incentives per the IWFFP.

We would be open to any discussion regarding an uplift in density on the site.

Thank you in advance for your consideration.

Regards,

Jonathan Joseph

Associate Director

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PI_logo-email



Our Ref: M210399

1 July 2025

Inner West Council
PO Box 14
PETERSHAM NSW 2049

SUBMISSION TO THE INNER WEST FAIRER FUTURE PLAN NOS. 2-18 STATION STREET, MARRICKVILLE

This document is a submission to Inner West Council's ('Council') *Inner West Fairer Future Plan* ('IWFFP' or 'Plan') published in May 2025, which is on public exhibition from the 21 May 2025 to the 6 July 2025. We act on behalf of our client, *Emag Apartments Pty Ltd*, who are an affordable housing developer and the proprietor of numerous sites throughout the Sydney Region, including Nos. 2-18 Station Street, Marrickville (the 'site'). We have been instructed to review and make a submission in respect of the subject property, as it pertains to the IWFFP. Specifically, this submission discusses the intended future planning controls which are applicable to the subject site, including zoning, building height and Floor Space Ratio (FSR). We suggest that Council reconsiders the above-mentioned site to incorporate the following:

- **Zoning:** Retain the E1 Local Centre zoning.
- **Height:** It is suggested that the maximum building height on the subject site should be increased to 45m.
- **FSR:** It is suggested that the maximum FSR on the subject site should be increased to 6:1.
- **Site Area Incentive:** It is suggested that Area 3 incentives apply to the subject site, consistent with other E1, E2 and MU1 zones in the LGA.

Whilst we agree with the changes foreshadowed by Council in the IWFFP as it applies to the Local Government Area (LGA), we raise specific concerns regarding the exclusion of Nos. 2-18 Station Street from the proposed uplift to base standards, ultimately negating the redevelopment potential of a highly accessible and well-located site. This submission respectfully requests reconsideration of the subject site in relation to the uplift in density envisaged within the Marrickville locality, as it represents an excellent opportunity for an increase in density not currently captured by the Plan. As such, we have provided suggestions which should be explored by Council in relation to the draft planning controls which are addressed in this submission.

Firstly, we do not agree with exclusion of the subject site from the proposed uplift in building height and FSR, as follows:

- **Exclusion of site from uplift:** The subject site has been excluded from any increase in building height and FSR under IWFFP. As described in further detail below, the subject site is located 100m from Marrickville Railway Station, and is situated amongst a variety of uses, services and facilities. To exclude the subject site (and generally, the E1 Local Centre zone) from any uplift in density is considered to be antipathetic to the objectives and intent of the IWFFP.
- **Urban form and strategic outcome:** Exclusion of the site and E1 zone from an uplift to the base standards, whilst upzoning the surrounding residential land to R4 High Density Residential with a FSR of 3:1 and height of 34.3m, will result in a density and urban form which decreases centric to town centres and railway stations. This is considered to be inconsistent with proper urban design and planning outcomes, where centres (such as the site) should have a greater density, which transitions down to surrounding residential zones.
- **Affordable housing contributions:** Further to the above, the site has been identified to provide for affordable housing contributions without any uplift in density. Whilst minimum site area and sustainability incentives will apply to the subject site, should any application fail to meet the threshold for these incentives, it will be subject to the same affordable contributions as surrounding properties (R4 zoned land) which are subject to vast increases in density.

Following the above, the subject site contains a number of superior site opportunities and characteristics, which encourage an increase in density omitted by the current Fairer Future Plan, which are detailed below.



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- **Accessible and strategic location:** The site is within 100m walking distance of Marrickville Railway Station and forms part of the Marrickville Town Centre;
- **The proprietor is capable of delivering residential accommodation in the short term:** The site is well-located, contains multiple frontages and is capable of being redeveloped in the short term. This is evidence by the recent approvals obtained on the subject site, and willingness of the properties to deliver affordable co-living housing;
- **Provide for additional housing:** The site can easily accommodate a greater increase in density due to its accessible nature and strategic characteristics and multiple frontages; and
- **Provide for affordable housing:** The additional FSR and height will be accompanied by an increase to the quantum of affordable housing in an appropriate location.

The suggested increase in building height and FSR will encourage residential accommodation in highly accessible locations, and create an urban form which increases towards centres and railway stations. This aligns with the suggested increase in density contained within the Marrickville Town Centre Urban Design Study ('Urban Design Study') prepared by SJB, dated 19 August 2022. That Urban Design Study found that the subject site and surroundings is capable of accommodating a 5:1 FSR and 42m (12 storey) height limit. The suggestions provided in this submission represent a minor increase when compared to the Urban Design Study, on the basis of a greater increase in density for the surrounding properties and opportunity to deliver additional housing in response to the current housing crisis.

Importantly, our clients have the capacity to deliver the public benefits through additional housing rather than being reliant on amalgamations or joint ventures, which will allow for a fast-tracked applications upon gazettal of the planning controls. This is discussed in greater detail throughout this submission.

2. SITE DETAILS

The subject site comprises of a single allotment located on Station Street known as Nos. 2-18 Station Street, Marrickville. The legal description of the site is Lot 100 in DP12294420. **Figure 1** below illustrates the location of the site (outlined in red).



Figure 1 Aerial image of subject site (Source: Near Map)



The subject site is generally rectangular in shape. The site is bounded by Station Street to the north, east and west. The site has a northern boundary of 27.6m, western boundary of 22.99m, and eastern boundary of 27.62m. The site has a southern (side) boundary of 27.49m, resulting in a total site area of 694.3m².

The site is currently occupied by four buildings which are one to two storeys in height. The buildings are currently vacant, dilapidated and contain a substantial amount of graffiti along the frontages.

3. SITE HISTORY

DA2020/0578 was lodged with Inner West Council and subsequently appealed with the Land and Environment Court. The proposal was approved by the LEC for the 'demolition of existing structures and construction of a mixed-use development comprising an 81 room boarding house, and 2 x commercial tenancies' on 1 February 2022.

DA2020/0578 was subject to a modification application under MOD/2024/0330, which was a Section 4.56 modification proposed amendments to reduce basement parking, minor internal changes, increase height of lift overrun. The application was lodged with the Land and Environment Court on 1 October 2024 and was subsequently was upheld by Land and Environment Court. The development is approved as eight storeys with a height of 26.45m and FSR of 4.78:1.

4. INNER WEST FAIRER FUTURE PLAN

The Inner West Fairer Future Plan is intended to provide opportunities for uplift in densities to meet local housing targets in lieu of the standardized controls applicable under the Amended Housing SEPP, including Transport Oriented Development and Low and Mid Rise Housing.

Specifically, it IWFFP seeks to amend the *Inner West Local Environmental Plan 2022* (IWLEP). The proposed amendments within the IWFFP as they relate to the subject site are considered in **Table 1** below, with a comparison between the existing and proposed maps provided in **Annexure A**. Of relevance, it is noted that the properties directly to the east of the subject site (as shown in **Annexure A**), are permitted a significant uplift in density including R4 High Density Residential zoning, 34.3m height and 3:1 FSR, not including incentives under the IWFFP or bonuses under the SEPP (Housing) 2021.

Table 1 IWFFP Proposed Amendments		
Control	Existing	Proposed
Land Zoning	E1 Local Centre	E1 Local Centre
Floor Space Ratio	3:1	3:1
Floor Space Ratio Additional Controls	Not applicable.	Not applicable.
Height of Buildings	26m	26m
Key Sites Map	N/A	N/A
Minimum Lot Size	N/A	N/A
Heritage	N/A	N/A
Land Reservation	No	No
Special entertainment Precinct	No	Special Entertainment Precinct
Affordable Housing Contributions	-	Yes
Minimum Street Frontage	-	No
Minimum Site Area Incentive Map	-	Area 2
Sustainability Incentive	-	Yes

5. OUR SUGGESTIONS

Whilst we support the overall intent of the IWFFP, we do not agree with the exclusion of the subject site from the uplift in density. Our suggestion to Council can be summarised as follows:

1. Re-evaluate the density permitted on the subject site and E1 Local Centre zone;
2. Provide an uplift density which is greater than the surrounding properties which are to be upzoned to R4 High Density Residential; and
3. Include the subject site within the minimum site area incentives (amending to Area 3), sustainability incentives and affordable housing contributions.

1. *Re-evaluate the density permitted on the subject site and E1 Local Centre zone*

The subject site is located within the E1 Local Centre zone, adjacent to Marrickville Railway Station. The properties surrounding the E1 zoned land, to the east and west, are to be upzoned to R4 High Density Residential, with a building height of 34.3m and FSR of 3:1. Whilst our client supports this change, to exclude the subject site from a proportional increase in density is considered to be antipathetic to the intent of the IWFFP, which seeks to provide for additional residential accommodation in strategic and accessible locations.

The existing E1 Local Centre zoning, 26m building height and 3:1 FSR, which remains unchanged, is generally lesser than the density of development envisaged for the properties to the east and west, where zoned R4 High Density Residential. As mentioned, these surrounding properties are afforded a building height of 34.3m (or 40.7m including incentives) and FSR of 3:1 (or 3.78:1 including incentives). Furthermore, the aforementioned maximum building height and floor space (including incentives), does not include the bonuses afforded by *Division 1 In-fill affordable housing* of the SEPP (Housing) 2021, which will allow for a further 30% increase density. Whilst the subject site will also benefit from the relevant incentives, it will continue to deliver a density which is lesser than the surrounding residential land.

From a strategic planning and urban design standpoint, the built form should be at a higher density where properties are in closer proximity to a town centre or railway station. Instead, the current plan provides for a lower density in closer proximity to the town centre and railway station (that is, the subject site and E1 zone), which increases as the distance away from the centres also increases. That is, development is encouraged at a higher density further away from station when compared to properties within town centres or in closer proximity to public transport options. This is counter to typical strategic and urban design planning outcomes and should be reconsidered for the subject site.

The subject site contains a number of opportunities and characteristics, which encourage an increase in density omitted by the current Fairer Future Plan, which are detailed below.

- **Accessibility and strategic location** – The site is within 100m walking distance of Marrickville Railway Station and is within the Marrickville Town Centre, when compared to the surrounding properties. Therefore, to exclude the subject site from a proportional increase in density, particularly given it is located along the key corridor in Marrickville, is inconsistent with the intent of the IWFFP which seeks to deliver housing in close proximity to various public transport options, services and facilities.
- **The proprietor is capable of delivering residential accommodation in the short term:** The site is well-located, contains multiple frontages and is capable of being redeveloped in the short term. This is evidence by the recent approvals obtained on the subject site, and willingness of the proprietor to deliver affordable co-living housing. It is likely that other properties in the immediate locality will be subject to complex ownership patterns and less desirable characteristics, thereby limiting short to medium term delivery of housing.
- **Additional housing** – The site can easily accommodate a greater increase in density due to its accessible nature and strategic characteristics, including single ownership and multiple frontages, which vastly improves development potential. As indicated by the approved development, the proprietor is committed to delivering additional housing on the subject site and this can be further encouraged through an uplift to the base building height and FSR standards.

- **Additional affordable housing** – The additional FSR and height will be accompanied by an increase to the quantum of affordable housing in an appropriate location. To deny the provision of additional residential accommodation, including affordable housing, is antipathetic to the intent of the IWFFP. Importantly, the site has been included in the affordable housing contributions mapping, despite not benefiting from any increase in density. It is considered unreasonable for the site to be subject to affordable housing contributions, where no additional density has been given to the site.

Ultimately, the subject site provides an opportunity for Council increase the quantum of housing within highly accessible and strategic locations, thus aligning with the main objectives of the IWFFP. There are no specific site affectations or constraints which limit development potential. In this regard, it is evident that the subject site has superior strategic opportunities when compared to the properties to the east and west, and should be reconsidered in terms of density. The approved development demonstrates that the site is capable of an increase in density beyond the current planning controls to deliver accommodation in the short term, thus responding to the housing crisis.

2. *Provide an uplift density which is greater than the surrounding properties*

As discussed above, whilst the IWFFP is supported on merit, to exclude the subject site from an uplift in density is considered to be antipathetic to its intent and objectives. The site is easily capable of accommodating greater building height and floor space to deliver additional residential accommodation in a highly accessible and key location. The following controls are recommended for the subject site, given its superior characteristics and opportunities:

- **Zoning:** Maintain the E1 Local Centre zoning;
- **Height:** Increase the maximum height to approximately 45m; and
- **Floor Space Ratio:** Increase the maximum FSR to approximately 6:1.

The above controls are considered to be appropriate to provide a density which is commensurate with the strategic location of the site, as discussed in this submission. No objection is made regarding the site incentives and affordable housing contributions, should the base standards be proportionally increased predicated on the site opportunities. Whilst subject to a future detailed application, the site is capable of accommodating an increase in density with the purposeful distribution of built form to provide for numerous public benefits, whilst achieving a high level of design excellence.

The suggested density is consistent with the Marrickville Town Centre Urban Design Study prepared *SJB*. In that Urban Design Study, a FSR of 5:1 and height of 42m (12 storeys) was proposed for the subject site. The suggestions represent a minor increase from the Urban Design Study on the basis of increased density within the surrounding residential zones and opportunity to deliver additional housing to combat the current housing crisis.

Ultimately, the provision of additional residential accommodation on the subject site, with excellent access to public transport, should be considered where any future development on the site can designed so that it will appropriately relate to the character of the locality. To maintain the current planning controls will be a suboptimal outcome, given the site is adjacent to the railway station, is located within the town centre and is also accessible to various services, facilities and multiple public open spaces.

3. *Include the site within the relevant incentive and affordable contribution maps*

It is agreed that the site should also be subject to the minimum site area incentives, sustainability incentives and affordable housing contributions, which are currently proposed on the subject site and for the properties to the east and west. As described, the site contains multiple frontages and is capable of redevelopment in the short and medium term. It is also capable of being amalgamated with surrounding properties and should therefore be subject to the applicable incentives.

It is requested that the site contain:

- Minimum site area incentive, amended to Area 3;
- Sustainability incentive area; and



- Affordable housing contribution.

The inclusion of the site in these incentive and affordable housing contribution areas will create the opportunity to provide additional housing (including affordable housing) within a highly accessible area. Importantly, it is requested that Council amend the minimum site area incentive to Area 3, which affords greater bonuses than the currently proposed Area 2. Typically, the IWFFP identifies other properties zoned E1, E2 or MU1 as being subject to Area 3 incentives. As outlined above, the site is within the Marrickville town centre, is adjacent to the railway station and is highly accessible on a key site with multiple frontages. In this regard, the site is also considered to be suitable for Area 3 minimum site area incentives.

Whilst our client does not oppose the imposition of affordable housing contribution within the IWLEP, it is unreasonable for the site to be subject to affordable housing contributions, where no additional density has been given to the site. That is, an affordable housing contribution is considered acceptable should the base building height and FSR standard be increased on the site.

6. CONCLUSION

We thank you for the opportunity to comment on the Fairer Future Plan in relation to the subject site and look forward to the outcomes of the exhibition process.

As discussed above, whilst we agree with Council's approach to the Plan, it is respectfully requested that Council reconsider the subject site as it pertains to an uplift in density in accordance with the suggestions provided above. We believe that these suggestions will still satisfy the intent of the IWFFP, where the site, which is located in a prime position, and has ideal access to services, facilities and public transport.

Furthermore, and as evident by the recent approvals on the site, it is capable of accommodating an increase in density to deliver additional residential accommodation in the short to medium term. This will not only satisfy the objectives of the IWFFP, but will also assist with combating the current housing crisis.

We trust the request made in this submission is clear, however, if you have any queries regarding this matter, please do not hesitate to contact our office.

Yours faithfully,
Planning Ingenuity Pty Ltd

Jeff Mead
MANAGING DIRECTOR



ANNEXURE A

Comparison of existing and proposed mapping



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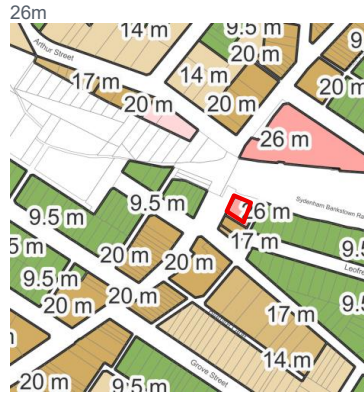
Table 2 IWFFP Proposed Amendments

Control	Existing	Proposed
Land Zoning	<p>E1 Local Centre</p>  <p>Land Zoning Map</p>	<p>E1 Local Centre</p>  <p>Land Zoning Map</p>
Floor Space Ratio	<p>3:1</p>  <p>Floor Space Ratio Map</p>	<p>3:1</p>  <p>Floor Space Ratio Map</p>
Floor Space Ratio Additional Controls		

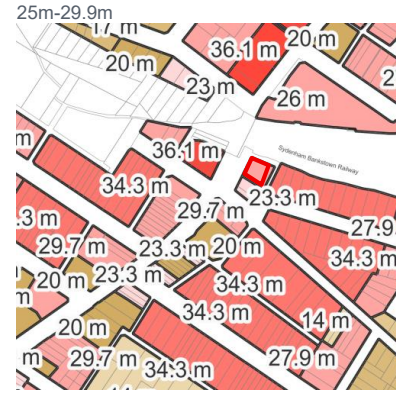


Table 2 IWFFP Proposed Amendments

Height of Buildings



Height of Buildings Map



Height of Buildings Map

Key Sites Map

N/A

N/A

Minimum Lot Size

N/A

N/A

Heritage

N/A

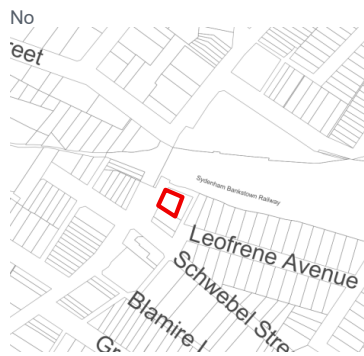
N/A

Land Reservation

No

No

Special
entertainment
Precinct



Draft Special Entertainment Precinct



Affordable Housing
Contributions

-

Yes



Table 2 IWFFP Proposed Amendments

		
Minimum Street Frontage	-	No
Minimum Site Area Incentive Map	-	
Sustainability Incentive	-	<p>Yes</p>  <p>Sustainability incentive</p>



From: Nikki Little
To: Council Meetings
Subject: Re: Application to speak at a meeting
Date: Tuesday, 23 September 2025 10:47:22 PM

Thank you for your email and the opportunity for my comments to be included and distributed to Councillors.

I first lived in Dulwich Hill in my early 20's a long time ago. I returned to Dulwich Hill and have now lived here for close to 20 years. The strong community is what makes such a difference. It is the diversity of people older, younger and everything in between. What makes the community unique is the current mix of housing, from heritage homes, modern homes and the eclectic mix of units and townhouses.

There has been a sensible approach to housing, high rise along major arterial roads whilst low rise developments on the sites of the old factories like in Williams Parade. It seems to me that our community has made every effort to retain and celebrate the heritage of our streets.

I live on Constitution Road, opposite Johnson Park and with the heritage Arlington oval at the back. All of the houses and the 1 apartment block are either 1 or 2 level homes. It works, the narrow, now very busy road connecting between Old Canterbury and New Canterbury Road is a hub of activity. The thought that a planner and Council believe that 6 storey apartment blocks are viable in this location is appalling. The buildings would over shadow the park and the oval, destroy the extraordinary trees that line Johnson Park and create further bottlenecks with traffic.

I agree that finding appropriate solutions to housing is important and difficult. However, dumping over development on 4 key suburbs is not an appropriate solution. There is no equity in the plan that Inner West Council is proposing. Council ought remember that the LGA encompasses many other suburbs other than those that have traditionally been for lower socioeconomic groups.

It is very clear that Dulwich Hill, Marrickville, Ashfield and Croydon are being unfairly targeted and are negatively impacted as a result of Council not implementing appropriate heritage zones in the same way as they have for the more affluent suburbs within the LGA including Haberfield, Balmain and Annandale. Or is it because the residents of these suburbs have greater influence.

There is much discussion that this plan is trying to support young people by creating affordable housing across the LGA. The other side of this coin is to suggest that older people need to sell and move in order to allow for this to happen. What is not being considered is where do these people go.. the assumption and commentary that they will earn lots of money is an unfortunate assumption that is often incorrect. Please keep in mind that one of the growing cohort of people experiencing housing vulnerability is older women. What is being done to support these groups given that the Council plan is not including any Public, Cooperative or Social housing.

The plan only supports affordable housing and in fairness a maximum of 3% is hardly an appropriate volume to satisfy the needs of the community. But of course as Council has highlighted a developer needs to make money. They must achieve a return... so the question should be asked how much of this plan is really viable.

One of the hubs of the Dulwich Hill community is our town centre, the vibrant collection of small businesses that our community loves to support. One of the key reasons the precinct continues to grow and thrive is the easy access to car parking. Removing this car parking will destroy the vibrancy and the viability of many of these businesses. If Council is going to continue with the current plan to build on these car parks - how do you anticipate older people and people with limited mobility, children or business operators will manage, or perhaps that is not Council's concern. It does seem that Council is determined to give away a community asset in order to create yet more mixed use developments that will not support affordable housing but will create many more \$1 million plus apartments. I do not think this is affordable, but it is the reality of what will be achieved through this unfair plan.

There is no proof points that building more apartments will see a reduction in the cost of apartments. Take for instance the TOGA development on Wicks Park where 2 bedroom apartments are already selling above \$1million as are new apartments in the Ashbury Residences. Rents in this development have an asking price of \$1100 per week. Even with the notion of 80% of market rent for affordable housing this is still close to \$900 per week. Not affordable. This is in the current market.. in 10 to 15 years based on current market growth of over 5% per year and apartment rental yields exceeding 4.1% it seems the likely outcome is continued growth in rental prices and housing prices.

This plan will only further fuel the gentrification of the area and change the foundations of the community forever. It seems that this plan will only continue to support the wealthy who can afford to purchase these high priced units and further push out the eclectic community we value. It seems this is the opposite of what Council claims it wants to achieve.

I would request that Council revisit the zoning areas to respect and protect the heritage of our community, support development in appropriate zones with a mix of low rise developments and increase the amount of affordable housing. Review the social and cooperative housing options. Additionally council should advocate with State government to increase public housing.

Kind regards
Nikki

Sent from my iPad