

Attachment 2 – Council's Out of Sequence Assessment Checklist

ATTACHMENT 2 - PRCUTS IMPLEMENTATION PLAN OUT OF SEQUENCE COMPLIANCE TABLE

The subject site is outside the PRCUTS '2016 - 2023 Release Area' which means that the redevelopment of the site should be in the medium to long term between 2024 and 2054. Proposals that depart from this staging need to be considered against the PRCUTS 'Out of Sequence Checklist' to ensure that changes to the land use zones and development controls can be justified against the underlying Principles and Strategic Actions of the Strategy. These include provision of necessary transport, services and social infrastructure to service a new population. The Checklist also aims to ensure the established benchmarks for the quality of development and public domain outcomes desired for the Corridor are achieved.

For a Planning Proposal to be consistent with the Out of Sequence Checklist, it must demonstrate (without relying on any future development application) that it will:

- Satisfactorily meet **all** the underlying Principles and Strategic Actions of the Strategy; and
- Achieve the established benchmarks for the quality of development and public domain outcomes desired for the Corridor.

The following Table - 1 provides an analysis of the Planning Proposal against the criteria outlined in the Out of Sequence Checklist. Table - 2 provides a detailed consideration of the Planning Proposal against the requirements of the checklist.

Table - 1 Out of Sequence compliance checklist

Out of Sequence checklist criteria		Consistency	Comment**
** Note- For detailed analysis, refer to the comments in the subsequent table.			
Criteria 1 Strategic objectives, land use and development:			
1.	The planning proposal can demonstrate significant delivery or contribution towards the Strategy's Corridor wide and Precinct specific vision.	/	The Planning Proposal does not adequately demonstrate that it meets the strategic, land use and development objectives outlined in the PRCUTS Implementation Plan. It does not provide significant delivery, contribution or benefits for the Strategy's Corridor wide and Precinct vision. It is inconsistent with the recommended built form recommendations and does not demonstrate that the new development will achieve design excellence. The Proposal is also out of alignment with the short term growth projections identified in the strategy and consequently, should not be supported.
2.	The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfils the relevant Strategic Actions for each Principle.	/	
3.	The planning proposal can demonstrate significant net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located.	/	
4.	The planning proposal is consistent with the recommended land uses, heights, densities, open space, active transport and built form plans for the relevant Precinct or Frame Area.	/	
5.	The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy.	/	
6.	The planning proposal demonstrates design excellence can be achieved, consistent with councils adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines.	/	
Criteria 2 Integrated Infrastructure Delivery Plan			
	An Integrated Infrastructure Delivery Plan, which identifies advanced infrastructure provision and cost recovery for the local and regional infrastructure identified in the Infrastructure Schedule, must support the planning proposal. The Integrated Infrastructure Delivery Plan must demonstrate a cost offset to council and agency costs for a set period that aligns with the anticipated timing for land development identified in the Implementation Plan 2016 - 2023. Infrastructure to be considered includes: <ul style="list-style-type: none"> · Public transport · Active transport 	/	The Planning Proposal is accompanied by an Integrated Infrastructure Delivery Plan (IIDP) which provides a methodology for calculating the local and state infrastructure contributions. The proponent has offered to make contributions towards hard and soft infrastructure as part of the Planning Proposal and future Development

Out of Sequence checklist criteria		Consistency	Comment**
<ul style="list-style-type: none"> · Road upgrades and intersection improvements · Open space and public domain improvements · Community infrastructure, utilities and services. 			<p>Application process.</p> <p>The State and local infrastructure contributions included in the proponent's IIDP are limited in scope. Council officers have reservations in relation to populating the 2016 PRCUTS Infrastructure Schedule without having undertaken associated work to update and determine the required local and State infrastructure contributions. There are also reservations about the methodology used; formulas applied and conclusions of the proponent's IIDP. The Planning Proposal should, therefore, not be supported.</p>
Criteria 3 Stakeholder engagement			
1.	Consultation and engagement with relevant stakeholders (council, government agencies, business, community, adjoining properties and user or interest groups, where relevant) have been undertaken, including any relevant pre-planning proposal engagement processes required by local council.	ü	<p>The proponent has undertaken preliminary stakeholder consultation as a part of the Planning Proposal process. However, due to various reasons outlined in this report, this Planning Proposal should not be supported in its current form and timing.</p> <p>In addition, the proponent has been unable to provide an adequate level of documentary evidence defining the level of project readiness for the delivery of key infrastructure projects.</p>
2.	An appropriate level of support or agreement is documented.	ü	
3.	Provision of documentary evidence outlining the level of planning or project readiness in terms of the extent of planning or business case development for key infrastructure projects.	✓	
Criteria 4: Sustainability			
The planning proposal achieves or exceeds the sustainability targets identified in this Strategy.		✓	<p>The proponent asserts that sustainability targets would be achieved at the future development application stage. This is inconsistent with the criteria which requires that 'Planning Proposal achieves or exceeds the sustainability targets identified in this strategy'. The Proposal is inconsistent with this criterion and therefore, should not be supported.</p>
Criteria 5: Feasibility			
The planning proposal presents a land use and development scenario that demonstrates economic feasibility with regard to the likely costs of infrastructure and the proposed funding arrangements available for the Precinct or Frame Area.		✓	<p>The Planning Proposal does not provide a detailed development feasibility analysis to meet this criterion.</p>
Criteria 6: Market viability			

Out of Sequence checklist criteria	Consistency	Comment**
The planning proposal demonstrates a land use and development scenario that aligns with and responds to market conditions for the delivery of housing and employment for 2016 to 2023. Viability should not be used as a justification for poor planning or built form outcomes.	/	The Planning Proposal does not provide a thorough needs assessment of the existing/future market conditions to support rezoning in the current context.

Table - 2: Detailed analysis of Planning Proposal against the Out of Sequence criteria

Out of Sequence Checklist analysis	
Criteria 1: Strategic objectives, land use and development	<p>1. The planning proposal can demonstrate significant delivery or contribution towards the Strategy's Corridor wide and Precinct specific vision.</p> <p><u>Proponent's comments:</u> The proponent claims that the Planning Proposal is consistent with the following Camperdown Precinct Guidelines recommended in the PRCUTS:</p> <ul style="list-style-type: none"> • Existing Character and Identity • Opportunities and Constraints • Future Character and Identity • Open Space, Linkages and Connections and Public Domain • Street function and Precinct Transport • Fine Grain • Green Edge Setbacks, Transition and Activity and Commercial Zones • Recommended Planning Controls <ul style="list-style-type: none"> ○ Land use ○ Building Heights <p><u>Officer's Comments:</u> The proponent's justification against the Precinct Guidelines is superficial. The following points outline Council officer's analysis:</p> <ul style="list-style-type: none"> • The proponent's claim that the Planning Proposal is consistent with the 'Existing Character and Identity' and 'Opportunities and constraints' recommended in the PRCUTS is flawed. These sections in the PRCUTS provide analysis of the existing area to set desired future character and are not guidelines. The Planning Proposal cannot be assessed against site analysis criteria. • Commentary against the guidelines under the 'Future Character and Identity' of the precinct is provided below: <ul style="list-style-type: none"> ○ <i>Future proofing the Precinct and parts of the Frame Area for long term strategic land uses</i> - Planning Proposal is consistent with the proposed land uses under the Strategy. However, PRCUTS encourages residential zoning in the Camperdown precinct to be focused on student or key workers housing rather than market housing to support the function of future Biotechnology hub as a specialist centre (PRCUTS Key action 4 for Land Uses - p.117). The Proposal is only for market housing with additional affordable housing subject to the provision of development incentives of State Environmental Planning Policy (SEPP) (Affordable Housing) 2009 at the Development Application (DA) stage. The affordable housing provision and a residential development focused entirely on market housing is inconsistent with the vision of PRCUTS. ○ <i>Increase the potential for student housing</i> - As discussed previously, the Planning Proposal does not include any student housing. The proponent claims that the proposal would provide 137 sqm (7.5% of new GFA) as affordable housing. However, the supporting voluntary planning offer letter does not include any provisions (Attachment 6) to negotiate the nature of that affordable with Council. The proponent intends to provide affordable housing only th the Development Application Stage. In this regard, it is noted that Part 1 of the Planning Proposal refers to affordable housing being provided in accordance with the floor space incentives of the Affordable Housing SEPP 2009. This indicates that affordable housing would be provided over and above the maximum sought FSR of 2.6:1 resulting in a maximum FSR of 2.67:1 (@3% bonus FSR) which is considered to be unacceptable. This is also inconsistent with the objectives of Greater Sydney Region Plan and PRCUTS which set a target of minimum of 5% affordable housing of new residential floor space created as a result of rezoning decision. ○ <i>Reinforcing the significant elements of the eight (8) character areas recognised in the Parramatta Road Corridor Fine Grain Study, September 2016</i> - The

Parramatta Road Corridor Fine Grain Study recognises the following key elements for the local area:

- § Design and Architectural Diversity
- § Building Typologies
- § Site Planning
- § Building Form and Setbacks
- § Transition Zones
- § Building Articulation
- § Amenity
- § Landscape

The proponent's design scheme does little to address the following significant elements - Building form and setbacks, Building articulation, Transition zones and Landscape. The site is at a key location adjacent to Johnston's Creek Stormwater Channel and provides an opportunity to enhance the existing character of the area and contribute to the desired network of green open spaces. The proposed design scheme provides a 5m setback on the ground level from Johnston's Creek site boundary. However, the basement car park is setback by only 2m from the site boundary which is considered to be insufficient to provide deep soil planting to enhance the landscape edge. The upper level setbacks to Chester Street and Johnston's creek site boundary are also considered to be insufficient as the proposed built form does not provide an adequate transition to the surrounding context. In addition, PRCUTS notes that there are limited street trees in the area and the proposal does not offer any contribution to improve the existing character of the area with new street trees.

- *For each character area, implementing the objectives and key guidelines set out in the Parramatta Road Corridor Fine Grain Study, September 2016 - The site is located in the Character area 3 of Parramatta Road Corridor Fine Grain Study which recommends the following objectives for the area:*
 1. *Preserve the eclectic mix of large industrial warehouses, scattered with terrace houses and low scale apartment buildings - The site's surrounding area is occupied by a variety of low-scale industrial warehouses/ SOHO units approximately 2 to 3 storeys high (refer to the images below). The adjoining properties to the south and west are a diverse mix of widely separated relatively small scale buildings. The proposed design scheme would disrupt this unique character and is therefore, inconsistent with this character area objective. It is also inconsistent with the height/ density envisaged in the PRCUTS.*



Image 1(to the left) - Adjoining development to the south of the site at 17 Chester Street, Annandale

Image 2 (to the right) - Chester Street cul-de-sac looking north towards Johnstons Creek

2. *Preserve the predominant zero lot setbacks to reflect the existing warehouse character* - The proposed design only partially 'preserves' the zero lot setback, however the existing building on this site and adjoining properties do not have complete zero setbacks. The site is occupied by a two storey industrial building which is partially built to the site boundary with the remainder (to the north) used as a car park and hard standing terminating above the site's boundary with Johnstons Creek (refer to the image below). The proponent's design would result in a 5 storey residential development with a 37m frontage along Chester Street with no ground level or upper level setbacks and 7 storey development with 57m frontage with 5m setback along Johnstons Creek site boundary. It can be argued that the site, therefore, does not preserve its existing warehouse character. The proposed development would establish a new precedent for the character of the area of relatively bulky residential blocks with no street level or upper level setbacks.

In principle, the proponent's intention to retain the existing industrial character is supported, however, the proposed design scheme does not appropriately reflect the existing or desired character and therefore, should not be supported.



Image 3 - Existing building on the subject site indicating step down towards

3. *Preserve the green pocket parks at the termination of Johnstons Creek Stormwater Channel No 55* - There is an existing pocket park at the end of Chester Street. The proposed triangular layout of the building results in hard edges/ poorly splayed corners at the interface between the existing park and the proposed building which is partially due to the irregular shape of the site (Refer to the image below). There is an opportunity to remodel the building layout by providing increased setbacks and deep soil planting at the northern interface which could soften the visual impact and enhance the amenity of the existing pocket park. The proponent's design does little to preserve/ enhance the green pocket park and is inconsistent with this objective.

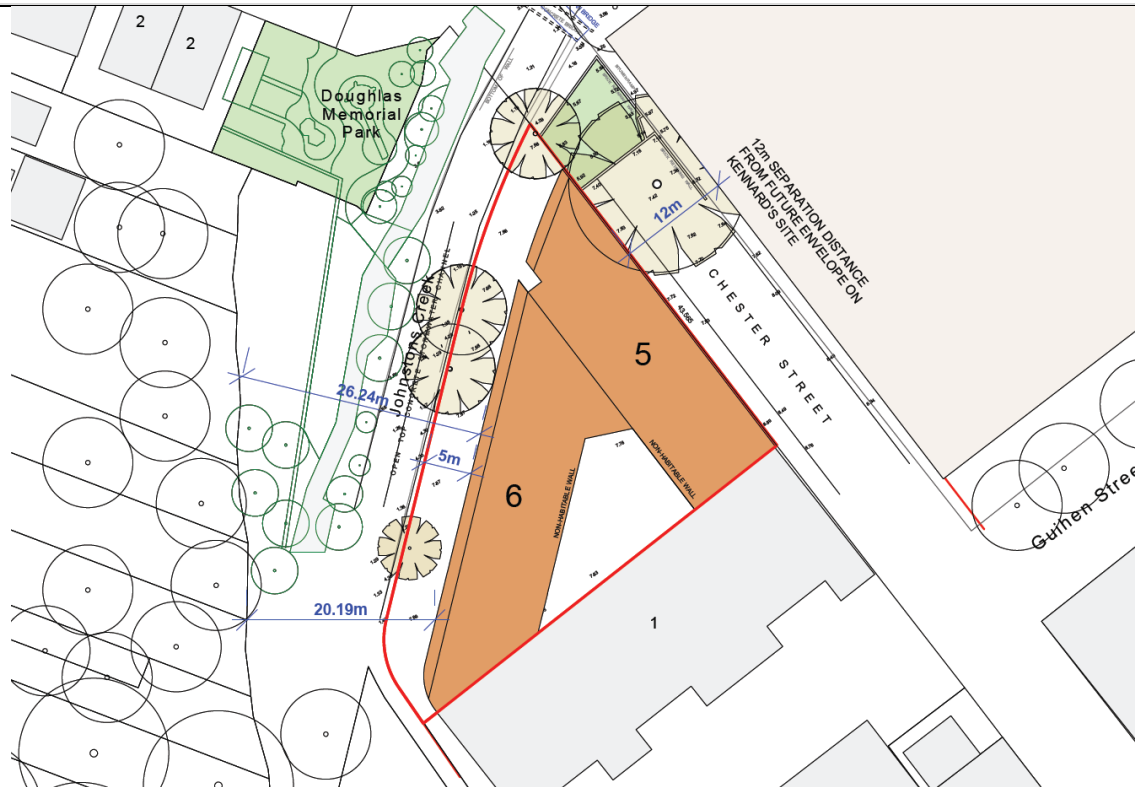


Image 4 - Extract from proponent's urban design scheme indicating the proposed building envelope

- *Providing green and active streets that connect residents and workers to small, diverse, and highly connected local and regional open spaces* - The proponent claims that open space would be provided along the site's northern edge as part of an open space and movement corridor along Johnstons Creek. The applicant considers the ground level setback from Johnstons Creek as part of this open space network. No provision has, however, been made in the Proposal or associated voluntary planning agreement letter of offer to ensure that this open space is made available for future community use.

In addition, a shared pedestrian/cycle pathway along the edge of the channel (minimum pathway width 3.5 metres) is desirable which would help provide a connection between Booth Street and Parramatta Road in future. The proposal does little to address this vision of PRCUTS. This green link is imperative in Council's vision to achieve a connected network of local and regional open spaces as it would provide a connection between Parramatta Road and Booth Street, Bicentennial Park and harbour foreshore.

- *Encouraging residential development in the Hordern Place industrial estate that addresses and enlivens O'Dea Reserve, and also delivers a new open space area for the Precinct's residents and workers* - Not applicable
- *Capitalising on the improved, high capacity public transport connections along Parramatta Road to the CBD* - The proposal is considered to be premature as it comes in advance of any improvements being made to public transport services along Parramatta Road. PRCUTS Implementation Plan recommends that the rezoning of this site be considered in the post 2023 phase to align with infrastructure improvements and development growth. There are concerns,

therefore, about the timing of this Planning Proposal as it comes in advance of the studies underway at local and State government levels to inform the future works in the Corridor area including the preparation of a precinct wide traffic study to determine the cumulative traffic impacts of a growing population and large infrastructure projects such as WestConnex.

- *Addressing the constraints of the north-south street blocks and limited east-west connections by requiring new development to deliver connections to the surrounding streets, work places and neighbourhoods* - The proposal does little to address this vision. PRCUTS envisages a new shared pedestrian/cycleway along Johnstons Creek between Booth Street and Parramatta Road; and along Chester Street which has not been adequately addressed in this Proposal.
 - *Rehabilitating and greening the Johnston's Creek corridor to connect the Precinct to the Bicentennial Parklands and the harbour foreshore walks along the line of Johnston's Creek and its tributaries* - As discussed previously, the Planning Proposal has potential to contribute towards the activation of Johnston's Creek Corridor via a new shared pedestrian/cycle pathway along the edge of the channel with additional open space to the north of the site adjoining the existing pocket park. The Planning Proposal does little to address this vision and therefore, should not be supported in its current form.
 - *Providing activated streetscapes and improved public domain particularly on north-south streets to create new 'green fingers'* - As discussed above, the Proposal does not contribute towards providing an improved streetscape along Chester Street. The site is located on the western side of the Chester Street cul-de-sac. The proposed residential development will result in additional visitor traffic in the area. A hammerhead turning bay is desirable at the end of this cul-de-sac and this will require a land dedication of land to Council for road widening. Overall, the Planning Proposal also has the potential to contribute towards public domain improvements such as footpath widening along Chester Street (to make it more pedestrian friendly), a new cycle link, a new turning bay at the termination of Chester Street and new street trees to provide characteristics similar to 'green fingers' which have not been adequately addressed in this Proposal.
 - *Reducing parking rates across the Precinct to capitalise on the strong public transport along Parramatta Road* - The proposed design concept indicates a mix of 1 and 2 bedroom apartment units with 15 one bedroom units and 27 two bedroom units. In accordance with the recommended maximum car parking rates in the PRCUTS, the Proposal should provide a maximum of 23.4 car parking spaces (calculated @ 0.3 spaces for 1 bed and 0.7 spaces for 2 beds). In the letter to Council dated 29 May 2018, the proponent indicated that the proposal would provide 24 car parking bays 'less than the maximum requirement of PRCUTS'. This calculation is incorrect as the proposal should provide only 23 car parking spaces if it intends to provide less off-street parking than the maximum recommended rates in the PRCUTS. The proponent has indicated that car share, unbundled or decoupled parking could be considered at the future development application stage to further reduce car parking rates. Whilst the proponent's intention to provide reduced parking rates is supported in principle, the proposal fails to demonstrate how this can be achieved at the Planning Proposal stage for it to meet the criteria of Out of Sequence checklist. It should also be acknowledged that until Council adopts new Development Control Plan parking controls, the Proposal's parking provision does not comply with LDCP standards.
- Detailed basement plan and parking rates can be considered at DA stage, however, there are significant concerns regarding the prematurity of this Proposal in advance of traffic modelling studies or improvements made to the public transport along Parramatta Corridor and therefore, it should not be supported. Support is likely to set an adverse precedent for other landowners/developers in Parramatta Road Corridor 'Out of Sequence' area.
- *Incorporating car parking into future development to unlock existing car parks and repurposing them for open space* - As discussed above.

2. The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfils the relevant Strategic Actions for each Principle.

Proponent's comments: The proponent claims that the Planning Proposal is consistent with the Strategy's seven land use and transport planning principles as listed below and fulfils the relevant Strategic Actions for each Principle.

- Housing choice and affordability
- Diverse and resilient economy
- Accessible and connected
- Vibrant community places
- Green spaces and links
- Sustainability and resilience
- Delivery

Officer's response: The proposal is considered to be inconsistent with the following land use and transport planning principles:

- *Principle -1: Housing choice and affordability* - The proposal will contribute towards housing choice and diversity as it proposes a residential development with a mix of 1 and 2 bedroom dwellings. However, no specific provisions have been made to provide 'diverse housing' as required under the PRCUTS (Refer to the Strategic actions below). The Planning Proposal does not adequately contribute towards the provision of permanent affordable housing. In addition, the proposal is considered to be premature as it comes ahead of Council's Local Housing Strategy which is to be finalised by mid-2019 to inform the appropriate mix of housing on rezoning sites. The Planning Proposal is over the density recommendations of PRCUTS. It is recommended that any increased density should only be considered after a strategic review of the Inner West housing market area including demand/ supply analysis rather than be considered in the context of individual sites/ ad hoc proposals.

Consequently, the Proposal is inconsistent with the following strategic actions:

Housing Diversity:

- *Provide 'diverse housing' for both purchase and rental markets that satisfies the objectives and Design Criteria of the Apartment Design Guide, that may include:*
 - Ø *lower cost market housing for rent or purchase, including new generation boarding houses with high quality shared spaces;*
 - Ø *moderately priced housing that is affordable to purchase for households earning up to \$150,000 or 80-190% of the median income;*
 - Ø *rental properties with long-term tenures and optional extensions in place;*
 - Ø *housing that uses design innovations, resulting in new products such as decoupled/optional car parking, which are suited to essential service workers, young 'city makers' early in their careers looking for 'starter homes', families with children, and downsizers/seniors;*
 - Ø *student accommodation;*
 - Ø *aged-care housing;*
 - Ø *housing that promotes innovation in other ways across type, tenure, construction methodology or other mechanisms to make such housing more attainable to a diversity of income groups.*
- *Explore incentives such as value sharing where rezoning is necessary to achieve renewal of private sites to capture a proportion of the increased land value to fund affordable, diverse and social housing projects.*

Affordable Housing:

- *Provide a minimum of 5% of new housing as Affordable Housing, or in-line with Government policy of the day.*
- *Principle 2: Diverse and Resilient economy* - The Planning Proposal will result in loss of 4 existing jobs as it would rezone the site from Industrial to Residential. Notwithstanding, it is consistent with the proposed land use recommended under the PRCUTS.

PRCUTS and Region and District Plans emphasise on the importance of employment lands and urban services in Sydney and in particular, in the Parramatta Road Corridor for its proximity to the city and surrounding residential areas.

PRCUTS recommends consideration of innovative mechanisms to broaden the role of urban support service industries to enable existing occupiers to remain, yet allow an intensification of use. This can be realised by including transitioning zoning controls to allow existing businesses to continue to operate, permitting a variety of new business occupiers or providing incentives to incorporate urban support services industries into the proposal.

This Proposal effectively seeks an FSR incentive without sufficiently contributing towards this objective. Therefore, any density/ height bonus should not be supported. The proponent's offer to provide SOHO units as part of the development cannot guarantee that these future live/ work units would operate as home offices and therefore, does not resolve the issue of loss of urban services land.

PRCUTS identifies Camperdown as a new strategic centre which would evolve as a specialised biotechnology hub. Delivery of affordable housing and other ancillary services is key to realising this vision to support Camperdown's function such as a strategic centre. The proposal does not contribute towards achieving this vision.

The proposal is also inconsistent with the following strategic actions:

Planning for jobs:

- *Implement the built form controls identified in the Parramatta Road Corridor Planning and Design Guidelines to encourage new typologies that overcome these challenges and facilitate evolving and innovative employment uses.*

Centres and Clusters:

- *Investigate the possible elevation of employment clusters or hubs in the Corridor to be recognised as Specialised Centres in A Plan for Growing Sydney and District Plans. Possible centres for consideration include Auburn as an employment hub and Camperdown as a new strategic centre.*

Resilient economy for the future:

- *Promote contemporary models of retail infill development, including multi-storey supermarkets and car showrooms that can offer more appropriate development outcomes within an established urban environment.*

Principle 3: Accessible and connected - The Planning Proposal has potential to contribute towards the achievement of sustainable travel by activating the Johnstons Creek Corridor with a shared pathway (pedestrian and cycle link) along the Corridor to connect Parramatta Road and Booth Street. The Planning Proposal is also inconsistent with the following Strategic Actions:

Integrated Transport Network:

- *Implement the Sydney CBD to Parramatta Strategic Transport Plan:* The proposed Camperdown Open Space and Transport Plan (as shown in the image below) identifies a new Prioritised Walking Link between Johnstons Creek and Pymont Bridge Road through the subject site and adjoining sites. This is considered to be an anomaly in the map as the supporting text in the Precinct Transport Plan identifies 'Johnston's Creek to Pymont Bridge Road along Chester Street' (p. 177) as a Prioritised walking link where high pedestrian activity would be located.

For Chester Street to function as a successful prioritised walking link, public domain improvement works such as footpath widenings, new streetscape plantings to enhance Chester Street's amenity and streetscape are desirable. The Planning Proposal is inadequate in this regard as it does not contribute to making Chester Street as a vibrant street.

Furthermore, the Strategy identifies Johnstons Creek corridor from Booth Street to Parramatta Road as a future Strategic Cycle Link and this has not been adequately addressed in this Proposal.

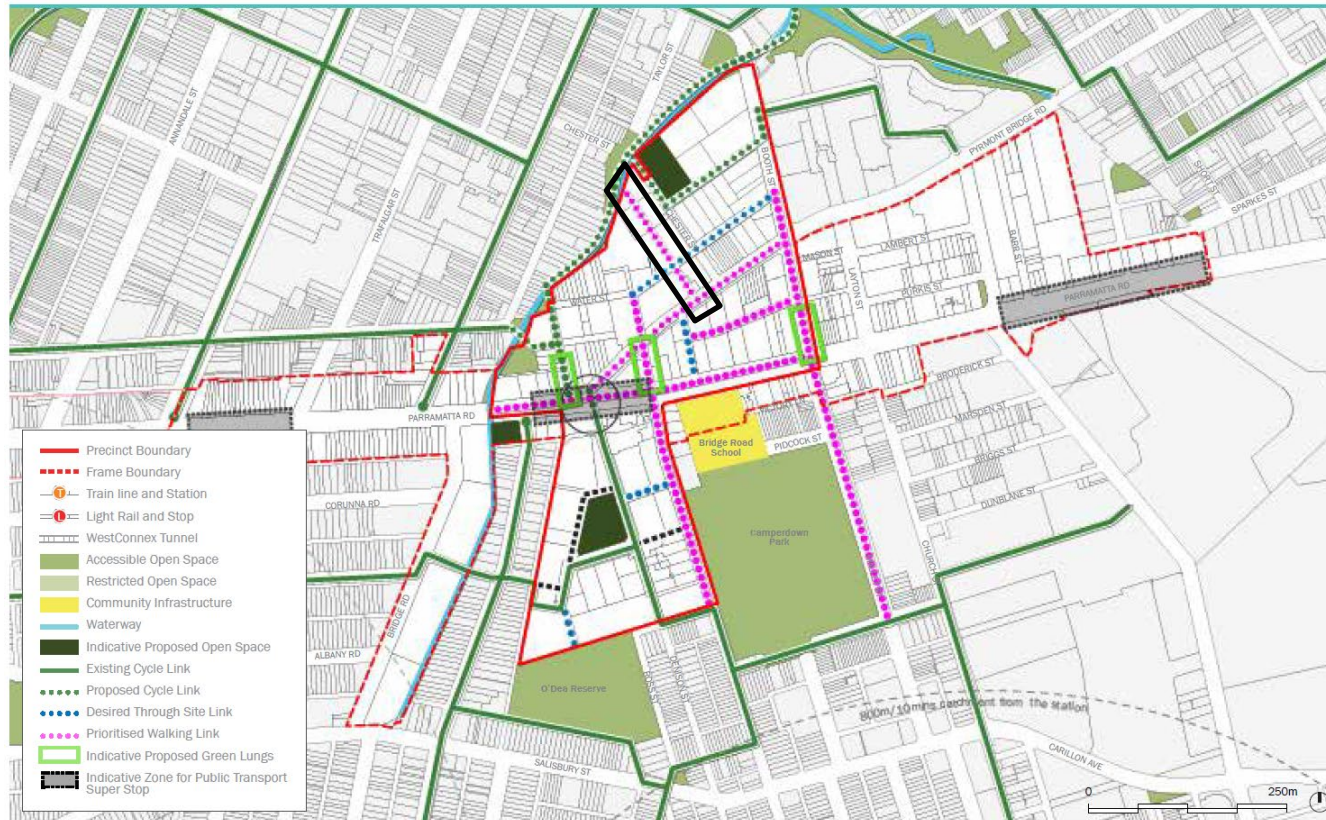


Image 5 - Open space and Active transport map. Map anomaly highlighted in black box.

On-street rapid transit for Parramatta Road:

- o Amend the State Environmental Planning Policy (Infrastructure) 2007 to identify Parramatta Road between Burwood and the Sydney CBD as a strategic corridor, inserting provisions that require planning proposals and development applications along the Corridor to be referred to Transport for NSW for comment, particularly at and around future superstop locations - This work is yet to be undertaken by DPE. Notwithstanding, the site is located in close proximity to the proposed Camperdown superstop and the Planning Proposal has been referred by the proponent to TfNSW for preliminary comment.

There are concerns with the timing of this Planning Proposal as it comes in advance of these studies underway at local and State government levels to inform the future infrastructure provision in the Corridor area including the preparation of a PRCUTS Inner West corridor traffic study to determine the cumulative traffic impacts of implementation of the Strategy. This collaborative DPE, Council and TfNSW study will help inform the preparation of IIDP for Out of Sequence Planning Proposals in the PRCUTS area and shape infrastructure considerations for future public transport and road upgrades and intersection works that will be required to service new developments in the corridor. The proposed increase in density in this Proposal over the recommendation of PRCUTS should not be supported until the traffic modelling has been completed.

TfNSW and Department's SIC team have alerted Council that this Planning Proposal is unlikely to be supported until the completion of Corridor wide Traffic Modelling Study. This is currently an unresolved matter and if the Planning Proposal were to proceed to the Gateway stage, TfNSW and other relevant stakeholders will be consulted formally in accordance with the Gateway conditions.

- Principle 4: Vibrant Communities and Places - Based on the discussions elsewhere in this report, the Planning Proposal is inconsistent with the following strategic actions:

15 minute neighbourhoods:

- *Deliver each Precinct along the Corridor as a '15 minute neighbourhood' through land use changes that implement the following principles:*
 - Ø *improved walkability, cycling and safety to support healthier communities*
 - Ø *improved housing choice and diversity*
 - Ø *increased usability of, and access to, safe open space*
 - Ø *improved local economic opportunities*
 - Ø *adequate local services and infrastructure*

Strategic actions for community infrastructure:

- *Strategically rezone parts of the Corridor (or where appropriate land outside the Corridor) for social infrastructure purposes in line with the Precinct Plans within the Parramatta Road Corridor Planning and Design Guidelines, Implementation Plan 2016 -2023 and Infrastructure Schedule.*
- *Implement development controls that incentivise the delivery of social infrastructure, such as floor space bonuses, and discounting or excluding floor space provided as social infrastructure.*

Design Excellence:

- *Prepare and implement a design excellence strategy*

- Principle 5: Green spaces and links - Based on the discussions elsewhere in this report, the Planning Proposal is inconsistent with the following strategic actions:

Neighbourhood parks and open space:

- *Strategically rezone parts of the Corridor for open space purposes, with a view to allocating land to create a high quality interconnected network of publicly accessible open space throughout the Corridor.*

- Provide a diverse range of connected, high quality open space and public domain areas to each Precinct in accordance with the Precinct Plans that ensures linear parks and trails linked to waterways, vegetation corridors and road reserves within 1 km of 95% of all dwellings.

Greening the Parramatta Road Corridor:

- Implement building setbacks as identified on the Precinct Plans within the Parramatta Road Corridor Planning and Design Guidelines....

- Principle 6: Sustainability and Resilience - The Planning Proposal relies there being a future Development Application to address consistency with the Sustainability and Resilience Principles. That is unacceptable as the Checklist explicitly requires a **Planning Proposal** to sufficiently demonstrate that it would achieve or exceed the sustainability targets identified in the Strategy. Consequently, the Proposal is inconsistent with the following:

Adaptive sustainability practices:

- Implement comprehensive built form strategies for building efficiency, renewable energy, strategic parking, public domain and sustainable infrastructure to target the long-term achievement of:
 - Ø 20% reduction in greenhouse gas emissions
 - Ø renewable energy installation
 - Ø 30% reduction in peak electricity demand
 - Ø 30% reduction in water consumption
 - Ø >15% of water delivered by non-potable sources, including rainwater or recycled water
 - Ø 30% reduction in car use
 - Ø 10-15% car share take-up rate

- Principle 7: Delivery - The Planning Proposal is inconsistent with the following Strategic Actions:

Effective Governance:

- Implement the Implementation Plan 2016 - 2023: As discussed previously.
- Establish a robust funding mechanism to apply to new rezoning/development proposals that will fund the local and regional infrastructure demands required to service the future population growth in the renewed Corridor: The Planning Proposal comes in advance of any such work been completed by Council or State Government. There is an existing shortfall of industrial lands, open space and community infrastructure in the local area. Whilst it is unrealistic to expect that the proposal can fund all the desired infrastructure owing to its small size and development feasibility issue, Council officer's analysis indicates that the proposal has potential to contribute towards a range of public domain works and it has not adequately addressed these opportunities. Some of these works are listed in the following discussion.
- Advise and assist councils in the revision of local contributions plans to address funding of local infrastructure and services in the Corridor: The proponent has provided a schedule of public works and associated Voluntary Planning Agreement in conjunction with the Planning Proposal to demonstrate how the proposal will contribute to the Local and State infrastructure. The proposed local works include:
 - Delivery of a pedestrian bridge over the adjoining Johnstons Creek to form part of an open space and movement corridor along the creek between Parramatta Road and Booth Street; and
 - Improvements to the adjoining existing pocket park at the terminus of Chester Street, south of Johnstons Creek, including:

- Ø Landscape treatment to enhance the public domain;
- Ø Lighting to enhance security at night; and
- Ø Public art including a dedicated graffiti wall to replace the existing informal graffiti-covered wall within the subject site.

These proposed local infrastructure works are considered to be too limited. The Proposal could potentially contribute towards provision of more '**significant**' benefits, including but not limited to:

- New open space to the north of the site which would act as extension of the existing pocket park.
- New linear park connection on the south of Johnstons Creek which could accommodate a shared pedestrian/ cycleway between Parramatta Road and Booth Street.
- Road upgrades along Chester Street including dedication of certain land to Council for road widening to provide a Hammerhead turning bay at the cul-de-sac, footpath widening, cycleway and new street trees.
- Student housing/ aged care housing.
- Adequate affordable/ key workers housing

These works could potentially considerably enhance the public domain and deliver community benefits on the site and adjoining area which will be vital to realising the vision of PRCUTS.

3. The planning proposal can demonstrate **significant** net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located.

Proponent's comments: The proponent asserts that the Planning Proposal would provide net community, economic and environmental benefits by:

- Provision of 41 residential apartments; and
- Incorporation of open space along the site's northern edge as part of an open space and movement corridor along Johnston's Creek between Booth Street and Parramatta Road.

Officer's response: Provision of new residential apartments at market rate is not considered to be a 'net community' benefit. Also, the Planning Proposal does not contribute adequately towards the provision of publically accessible open space. No intrinsic economic benefits would arise from the Planning Proposal. Instead, it would result in loss of employment generating and urban services land without deploying any innovative mechanisms that might broaden the role of employment generating and urban services land.

The open space on the site's northern edge is in reality a setback required for flood planning and building design reasons and does not constitute true public open space. As discussed previously in various sections of this report, the Planning Proposal fails to demonstrate '**significant** net community, economic and environmental' benefits and therefore, should not be supported.

4. The planning proposal is consistent with the recommended land uses, heights, densities, open space, active transport and built form plans for the relevant Precinct or Frame Area.

Proponent's comments: The proponent claims that the Planning Proposal is consistent with the recommended land use, height, open space, active transport and built form plans for the relevant Precinct Area except the density.

Officer's response: The following table provides a detailed analysis of the Proposal against the PRCUTS recommended controls. The Proposal is consistent with the recommended land use but inconsistent with all the other built form controls as discussed below:

Control	PRCUTS recommendation	Proposed	Ü or X	Officer's comments
Land use	R3 Medium Density Residential - Focus residential development on students, key workers and affordable housing (Key Action 3, Camperdown Precinct , Pg. 117 PRCUTS)	R3 Medium Density Residential	Ü	The Proposal is consistent with the recommended land use 'R3 Medium Density Residential' as coloured on the land use map. However, the supporting text in PRCUTS encourages residential zoning in the Camperdown precinct to be focused on student or key worker housing to support the function of future Biotechnology hub as a specialist centre rather than market housing. This has not been adequately considered by the Proposal.
Density/ FSR	1.5:1	2.6:1	✓	The Proposal seeks a variation of 73.33% over the recommended FSR control in the PRCUTS.
Height	17m or 4 storeys	17m or 6 storeys	✓	The proponent's design complies with the control '17m' as coloured on the 'Camperdown Recommended Building Heights' map. However, this does not match up with the supporting written text in PRC Planning and Design Guidelines (p.270) which refers to a maximum height of 17 metres as equivalent to 4 storeys in other places in the precinct such as Hordern Place etc. It is considered that the same principle should apply to the subject site and its neighbouring sites and therefore, the maximum building height should not exceed 4 storeys.
Open space and active transport	<ul style="list-style-type: none"> Green and embellish the currently underutilised land along Johnston's Creek to create a significant new regional green link accommodating cycling and pedestrian links. Provide new and improved pedestrian links to improve permeability and provide additional north-south and east-west connections at Chester Street. Provide new or upgraded cycling links to provide and improve connectivity 	<ul style="list-style-type: none"> Development incorporates open space along the site's northern edge as part of an open space and movement corridor along Johnston's Creek between Booth Street and Parramatta Road. Development encouraging active transport through being located in close proximity to existing and future public transport services, existing parks and educational establishments. 	✓	<p>The proponent's intention to provide open space as a part of the open space and movement corridor along Johnstons Creek can be supported in principle but has not been clearly indicated in the concept plans. It also would seem to in practice simply be the setback required for architectural and flood control reasons.</p> <p>There are also concerns regarding the extent of this open space and its integration with the surrounding area as the Planning Proposal seems to be superficial in mapping this 'open space'. No provisions have been made in the related voluntary planning agreement letter of offer or Planning Proposal regarding how this open space would be provided and used and whether it would be available for the use of local residents.</p> <p>Also, the Planning Proposal does not contribute adequately towards improving Chester Street to provide improved/ new cycle links along the Street.</p>

	<p>and close missing gaps in the network along Johnston's Creek between Matheison Street (Parramatta Road) and Booth Street.</p>			
<p>Built form</p>	<ul style="list-style-type: none"> • Preserve the zero lot setbacks in the northern parts of the Precinct consistent with the PRC Fine Grain Study. • Upper level setbacks could be provided in the northern part of the Precinct of Parramatta Road so long as the predominant scale and street wall is preserved at the ground and first floors. • Provide setbacks consistent with Section 4 of the Guidelines in all other areas of the Precinct and Frame Area. • Preserve a built for transition consistent with Figure 12.10 to any open space to ensure than 50% of the open space will receive a minimum of 3 hour direct solar access between 11am and 3pm on 21 June. • Provide appropriate built form transitions for all other new development consistent with the PRC Fine Grain Study, 	<p>The proponent claims that the proposal is consistent with the recommended built form controls.</p>	<p>•</p>	<p>The proposed design should not rely on preserving the zero lot setback as this is not the predominant character of the existing site or adjoining area.</p> <p>The site is currently occupied by a two storey industrial warehouse building which is partially built to the site boundary with a zero setback while the remainder of the site (to the north) is used as a car park and hard standing terminating at the pocket park/ Johnston's Creek.</p> <p>The proponent's design scheme would result in a 5 storey residential development with a 37m frontage facing Chester Street with no ground level or upper level setbacks. This would establish a new precedent for the area of a bulky residential block with no street level or upper level setbacks. This is inconsistent with the objective of reflecting the existing character area.</p> <p>The proposed development would result in a six storey development with 6m setback and building frontage of 18.15m to Johnstons Creek. The proposed development does not provide appropriate bulk, scale and transitions to Johnstons Creek or the adjoining proposed extension of the Annandale Heritage Conservation area and does not contribute adequately to the improvement of Johnstons Creek.</p> <p>In principle, the proponent's intention to retain the existing industrial character is supported, however, the proposed design scheme does not reflect the existing or desired character and therefore, should not be supported</p>

	September 2016 to existing built form.			
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5. The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy.

Proponent's comments: The proponent claims that the new development is consistent with the desired future character and will contribute 41 new dwellings towards the achievement of 700 new dwellings by 2050 in Camperdown precinct.

Officer's response: The Proposal has been assessed previously under Criteria 1 'Future Character and Identity' guidelines. The following section evaluates the Proposal against the PRCUTS Proposed Growth Projections and Proposed Indicative Land Use Mix:

Proposed Growth Projections

	2023	2050
Population	720	1,390
Dwellings	389	700
Jobs	1,400	2,285

Proposed Indicative Land Use Mix (additional)

	RESIDENTIAL GFA (M ²)		EMPLOYMENT GFA (M ²)	
	SHORT TERM (2023)	LONG TERM (2050)	SHORT TERM (2023)	LONG TERM (2050)
Precinct	0	62,000	105,000	108,000
Frame Area	0	10,500	0	28,000

Image 6 - Extract form the PRCUTS Planning and Design Guidelines indicating the proposed growth projections and indicative land use mix for Camperdown precinct (p. 256)

It is noted that there is an anomaly in the growth projections identified in PRCUTS as the short term projections for proposed dwellings (389 dwellings) do not match up with the proposed indicative residential GFA (0 sqm) in the precinct/ frame area. PRCUTS anticipates that no residential GFA would be developed in the short term until 2023 as the first phase implementation area is only recommended for rezoning to B5 Business and Enterprise Zone which discourages new residential development.

The Proposal is inconsistent with the proposed future growth projections in the short term but could potentially contribute towards the proposed residential GFA in the long term (2050).

6. The planning proposal demonstrates design excellence can be achieved, consistent with councils adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines.

Proponent's comments: The proponent claims that the proposed development achieves design excellence through design in response to strategic and local context analysis as detailed in the Urban Design Report. The proponent has also submitted a design excellence statement and an independent design review by DKO Architecture claiming that the proposal is consistent with the design provisions of PRCUTS.

Officer's response: Design excellence fosters design outcomes that go beyond statutory requirements to achieve innovative, liveability, sustainability, aesthetic and functionality outcomes in buildings and the public domain. Council has not yet formulated any design excellence strategy and therefore, the proposal should satisfy the

	<p>design provisions recommended in the PRCUTS to ensure that the future development would result in a high design quality.</p> <p>Council officers have undertaken an in-house analysis of the proposed urban design scheme. As discussed in various sections of this report, it is considered that the proposal is inconsistent with a number of the design and built form provisions recommended under PRCUTS and does not <i>'go beyond statutory requirements to achieve innovative, liveability, sustainability, aesthetic and functionality outcomes in buildings and the public domain'</i> as required by the Strategy. The proposal also heavily relies on a future development application to achieve sustainability targets without making any provisions in the Planning Proposal to achieve this vision. In addition, the applicant's supplemented Design Excellence Review by DKO Architects is considered to be limited and underdeveloped as it does not provide a thorough assessment of the proposal against the design provisions recommended by the PRCUTS.</p> <p>One of the mechanisms mentioned in the PRCUTS to deliver design excellence includes reporting of the Planning Proposal to independent and expert design review panels. This Planning Proposal will be reported to Inner West Planning Panel which can provide independent and transparent advice on the future development of this site. The recommendations of the Panel will be reported to Council for consideration as a part of the Planning Proposal assessment report.</p>
<p>Criteria 2: Integrated Infrastructure Delivery Plan</p>	<p>An Integrated Infrastructure Delivery Plan, which identifies advanced infrastructure provision and cost recovery for the local and regional infrastructure identified in the Infrastructure Schedule, must support the planning proposal. The Integrated Infrastructure Delivery Plan must demonstrate a cost offset to council and agency costs for a set period that aligns with the anticipated timing for land development identified in the Implementation Plan 2016 - 2023. Infrastructure to be considered includes:</p> <ul style="list-style-type: none"> · Public transport · Active transport · Road upgrades and intersection improvements · Open space and public domain improvements · Community infrastructure, utilities and services. <p>The Planning Proposal is accompanied by an Integrated Infrastructure Delivery Plan (IIDP) which provides a methodology for calculating the local and State infrastructure developer contributions. The proponent has offered to make contributions towards hard and soft infrastructure as part of the Planning Proposal and Development application process.</p> <p>There are concerns with the timing and sequencing of this Planning Proposal as it comes in advance of studies underway at local and State government levels to define what future infrastructure works will be necessary in the Corridor area. This includes preparation of a PRCUTS IW Corridor wide traffic study to determine the cumulative traffic impacts that will follow from implementation of the Strategy. This joint DPE, Council and TfNSW study aims to inform the IIDP and would provide detailed consideration of future infrastructure works including public transport and road upgrades; and intersection works to be undertaken as part of new developments in the corridor.</p> <p>Council is yet to prepare an Inner West S7.11 (previously s94) Contributions Plan for the Parramatta Road Corridor to determine the level of monetary contributions required for infrastructure works including delivery of new open space, active movement corridors, road upgrades, provision of recreational, community and cultural facilities etc.</p> <p>The State and local infrastructure developer contributions included in the proponent's IIDP are considered to be limited. Council officers have reservations regarding how the proponent has populated the PRCUTS Infrastructure Schedule without Council/ State Government having undertaken associated work to determine the infrastructure contributions.</p> <p>The proponent claims that the proposed development incorporating 41 residential apartments will have limited impact on existing hard and soft infrastructure as it can be adequately serviced because the site is already in a developed urban location. The proponent's IIDP concludes that 'upgrades in existing infrastructure are not</p>

required to support the demand created by specific development'. This inference is not supported by an adequate analysis and consequently, cannot be accepted. The Planning Proposal would result in additional dwellings which would generate pressure on existing infrastructure, utilities and services. The development should, therefore, contribute a pro-rata share of the total level of developer contributions that will be required across the entire Camperdown precinct.

Council officers are of the view that the PRCUTS's Infrastructure Schedule cannot be readily applied to determine accurate infrastructure contributions as the Council and State Government have not yet completed the studies necessary to update the 2016 cost estimates or capture the costs of infrastructure not covered by the Schedule.

In this context, the Schedule acknowledges that it is based on a high level analysis of population, dwelling and employment projections for the Corridor that will require additional detailed investigation. There are also gaps in this Schedule which cannot adequately be addressed until such time as Council implements a new local Contributions Plan. Its preparation will require additional analysis including audits of existing facilities and preparation of needs studies for the wider local government area beyond the Corridor.

There are reservations about the methodology used; formulas applied and the conclusions of the IIDP. Overall, it is noted that the proponent has underestimated the level of construction rates for projects listed, but not quoted in the Infrastructure Schedule. The Council's Property Capital Projects team have provided the following detailed analysis of these proposed rates in the Infrastructure schedule (p. 55 of Attachment 14):

Active Transport Network

- **Items 1-13:** These works cannot be precisely estimated as the scope of works is broad and generic. Notwithstanding this the proposed base rate of \$225/m is very low and the recommended rate would be approximately \$350/m with some works such as site establishment being as high as \$950/week.

Community Infrastructure

- **Item 14 - Meeting Space:** Proponent's rate equates to \$2,500/ m² for a new building. This is very low and is anticipated to be approximately \$3,500/m² or \$1.5M.
- **Item 15 - Cultural space:** Proponent's rate equates to \$200K/ building refurbishment which is low. This is generic without knowing which buildings are chosen and the extent of the refurbishment. In Council's view the rates should be approximately \$350K-\$400K per building.
- **Item 16 - Childcare:** Council recently completed a 60 places childcare building at Leichhardt park for \$3.5M. Using this rate would mean 49 places equates \$2.86M. The rate quoted (\$2M) is poor and probably excludes landscaping, furniture, fixtures and equipment.
- **Item 17 - Outside of school hours:** Should be the same as above.

Road/ Intersection Upgrade

- **Item 18:** This rate cannot be adequately commented until Council has completed its precinct wide traffic modelling;

Open Space and Recreation

- **Item 19–24:** All the proposed rates are too generic and may apply to other areas of Sydney, however all IWC grounds usually have some form of contamination and the remediation costs are quite high. That rate should be more like \$400/m².

Camperdown Precinct Urban Amenity Improvements Program

- **Items 26-27 Proposed cycling link:** The proposed rates for design, lighting and a proper cycling path have been very poorly quoted. Based on Council's recent works or the upgrade of the path (2.5m to 3m asphalt footpath and new lights between Marion Street and Parramatta Road, the rate ended up in the vicinity of \$1,600/ m). For new work this should be more like \$1,800- \$2,000/m instead of the proposed rate \$255/m.

Council is currently preparing its new developer contributions plan which will build financial capacity for provision of additional infrastructure in the Corridor and support future population growth in the Inner West LGA. In the absence of this critical information, Council officers are not in a position to reliably confirm the proponent's calculations and rates. Local infrastructure cannot be adequately levied for this type of proposed spot rezoning in the PRCUTS corridor until IWC adopts a new developer contributions plan.

Support of this Proposal could compromise the holistic and inclusive basis for achieving wider strategic planning objectives at local and State government level.

Criteria 3: Stakeholder Engagement	1. Consultation and engagement with relevant stakeholders (council, government agencies, business, community, adjoining properties and user or interest groups, where relevant) have been undertaken, including any relevant pre-planning proposal engagement processes required by local council.
	The proponent has undertaken preliminary stakeholder consultation as a part of the Planning Proposal process. This is in line with Council's Pre-Planning Proposal response to the applicant dated 26 October 2017. No issues are raised in this regard.
	2. An appropriate level of support or agreement is documented.
	The Planning Proposal is accompanied by documentation which outlines the stakeholder engagement undertaken by the proponent as part of the Planning Proposal process. It is noted that a number of key concerns raised by Council and State Government agencies including Transport for NSW, Roads and Maritime Services remain unresolved.
	3. Provision of documentary evidence outlining the level of planning or project readiness in terms of the extent of planning or business case development for key infrastructure projects.
	No documentary evidence has been provided in this regard.
Criteria 4: Sustainability	The planning proposal achieves or exceeds the sustainability targets identified in this Strategy.
	The proponent claims that sustainability targets specified in Principle 6 of PRCUTS would be achieved at the Development Application stage. This is unacceptable as it does not provide any certainty that these targets would be achieved in future. If the Planning Proposal proceeds to the Gateway Stage, the Sustainability provisions should be part of the future LEP amendment clause to ensure that the development achieves these sustainability targets.
	<p>The following sustainability and resilience requirements would have to be built into the Planning Proposal:</p> <ul style="list-style-type: none"> • Future development must satisfy the energy and water target requirements as set out in the Table 3.6 (pg. 49) of the PRCUTS Planning and Design Guidelines. • Future development must demonstrate consistency with the smart parking strategies and design principles outlined in section 3.8 - Car Parking and Bicycle Parking of PRCUTS Planning and Design Guidelines and agreed with Council. • Public domain and building should be designed to reduce any localised urban heat island effect by: <ul style="list-style-type: none"> ○ providing new moderate/ large sized street trees along the site's Chester Street and Johnstons Creek frontage. ○ Providing vegetation, green roof, green walls and materials with a high solar reflectance index of at least 50% of all building surfaces. Western and northern building facades should be a particular area of focus. • Stormwater run-off flow rates from the site should not be more than predevelopment site discharge rates. • Stormwater run-off quality should reduce annual loads of: <ul style="list-style-type: none"> ○ Total nitrogen by 45% ○ Total phosphorus by 65% ○ Total suspended solids by 85%. • Provide additional publically available open space along the site's northern most edge and contribute towards the provision of a new linear connection including shared pedestrian and cycleway along Johnston's Creek between Parramatta Road and Booth Street. • Incorporate Water-Sensitive Urban design treatment along the site's northern and western boundary.
The planning proposal presents a land use and development scenario that demonstrates economic feasibility with regard to the likely costs of infrastructure and the proposed funding arrangements available for the Precinct or Frame Area.	

Criteria 5: Feasibility

The Planning Proposal does not provide a thorough economic analysis to demonstrate feasibility with regard to the likely costs of infrastructure and the proposed funding arrangements available for the Precinct and Frame Area. The Integrated Infrastructure Delivery Plan (prepared by Northrop) accompanying the Planning Proposal provides a methodology to calculate contributions for State and Local Infrastructure. Council officers have reservations about the methodology used; formulas applied and conclusions of the IIDP.

The PRCUTS Camperdown Action Plan 2016 - 2023 provides an outline for funding framework or satisfactory arrangements for provision of new roads, community facilities and open space which would be delivered by new developments and funded through S94 (now S7.11) contributions, the SIC levy and/or works in kind. In this regard, the Planning Proposal has not provided a feasibility study to demonstrate economic feasibility for these infrastructure works or of what the proposed funding of these works will be.

The Action Plan does not envisage any increase in residential GFA in the precinct in the short term, but it does provide a list of key actions if future land uses permit affordable housing. These include:

- Provision of a minimum of 5% of new housing as affordable housing or in line with the Government policy of the day and a range of housing diversity types as identified within the Strategy;
- Implementation of Sydney CBD to Burwood Parramatta Strategic Transport Plan and operation of a rapid bus service along Parramatta Road;
- Active transport contribution including delivery of Johnston Creek pedestrian and cycle link and provision of new cycle and walking links;
- Provision of monetary contributions towards:
 - Medium and long term open space facilities;
 - Medium and long term Community Infrastructure/ facilities;
 - Primary and Secondary Schools;
 - Proportion of child care and Out of School Hours places;
 - Satisfactory arrangements with Sydney Local Health District for its assets at Royal Prince Alfred Hospital.

The proposal has not satisfactorily addressed the above requirements and therefore, should not be supported.

Criteria 6: Market Feasibility	<p>The planning proposal demonstrates a land use and development scenario that aligns with and responds to market conditions for the delivery of housing and employment for 2016 to 2023. Viability should not be used as a justification for poor planning or built form outcomes.</p>
	<p>The Planning Proposal does not provide a thorough land use and development scenario or any needs assessment to demonstrate that it responds to the market conditions for delivery of housing and employment. The Proposal also does not provide sufficient information to demonstrate capacity for additional residential floorspace growth in the corridor over the recommended density in PRCUTS which must take into account the existing/ future market conditions and capacity of transport and other infrastructure such as schools, child care facilities, public open space etc.</p>
	<p>In reality, this Planning Proposal intends to create a development that would be higher density recommendations of PRCUTS without putting forward a strong case to justify this in terms of demand and supply of housing and employment. There are concerns that the development would result in loss of employment and urban services land which PRCUTS envisages being retained until 2023. The District and Regional Plans also strongly advocate the retention of all industrial lands. The proposal is inadequate in demonstrating that the existing business is unviable to support its rezoning in the current market conditions.</p>
	<p>In the case of Camperdown precinct which is envisaged to be a specialist biotechnology precinct with world class research, education and health uses in future; it is extremely important to ensure that development is aligned with the needs of such a specialist centre. In this regard, Council and relevant State agencies are yet to undertake associated work including preparation of Local Housing Strategies, Character Area statements, completion of the new Inner West Council LEP/ DCP, Traffic Modelling and Camperdown Collaboration Area Urban Framework/ Master Plan which would provide a holistic development framework for the precinct.</p> <p>The Planning Proposal comes in advance of this work and would compromise the holistic and inclusive basis for implementation of the PRCUTS and the IW LEP and DCP and therefore, should not be supported.</p>