



ATTACHMENT 1 - PLANNING PROPOSAL ASSESSMENT CHECKLIST

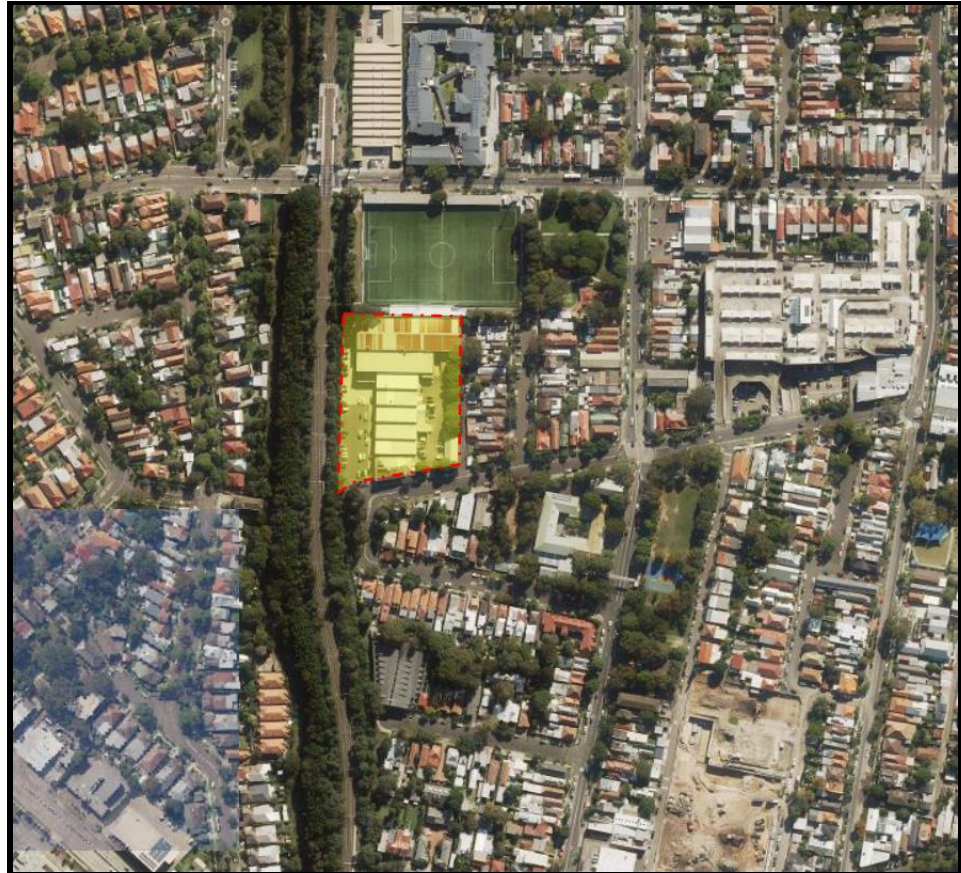
PLANNING PROPOSAL APPLICATION No. IWC_PP_2018_ 04

67-75 Lords Road, Leichhardt

1. Planning Proposal (LEP Amendment Request) Application Details	
Planning Proposal Application Number:	IWC_PP_2018_04
Property Address:	67-75 Lords Road, Leichhardt
Legal Description:	LOT 1 DP 940543 & LOT 1 DP 550608 (includes easements)
Date of Lodgement:	25 October 2018
Type of Planning Proposal (Minor/ Major/ Complex):	Complex LEP Amendment
Fees Paid:	\$135,000.00 (Complex LEP fee and DCP fee)
Pre-Planning Proposal meeting Minutes (If attended):	Attached to the Planning Proposal report. Letter dated 17 October 2018.
Project Planner:	Kim Johnston/Leah Chiswick
Proponent:	Platino Properties Pty Ltd
Owner/s of the property Notification (Written and signed):	Yes
Current zoning:	Light Industrial IN2
Description of Proposal:	To amend Leichhardt Local Environmental Plan 2013 to enable the redevelopment of 67-75 Lords Road, Leichhardt by rezoning the site from IN2 Light Industrial to R3 Medium Density Residential, introducing a maximum height of building of RL 35, increase the maximum FSR to 2.4:1 and inclusion of a site-specific provision for additional non-residential uses on the site and bonus FSR for a multi-use community use. A draft Voluntary Planning Agreement offer is also included as part of the proposal including public domain works and affordable housing.
Does it propose to reclassify public land?	No
Description of all existing uses and existing development on the land:	Light industrial and commercial uses comprising 9,979sqm of floor space and 17 tenants. Current uses include warehousing/storage, furniture restoration and joinery businesses, private art school and private recreation facilities
Site area:	10,691sqm
History of subject site (if required):	<p>Detailed in Council report:</p> <ul style="list-style-type: none"> • Planning Proposal (May 2014) - Rezoning the site from IN2 Light Industrial to R3 Medium Density Residential; • Pre-Planning Proposal (August 2018) - Rezoning the site from IN2 Light Industrial to R3 Medium Density Residential with proposal to include some non-residential

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	uses.
Description of surrounding properties:	The northern boundary of the site adjoins Lambert Park. To the east and south of the site are one and two storey single residential terrace dwellings. To the west is the light rail and Hawthorne canal.
Any former Council resolutions:	Yes. The former Leichhardt Council previously refused to support a similar Planning proposal on the site in August 2014. This previous Planning Proposal only included residential uses and only related to 67-73 Lords Road Leichhardt. The reasons for refusal of this previous Planning Proposal have been considered in the assessment of this proposal.
Related projects or similar Planning Proposals (any that would impact upon the outcome of this project for e.g. Strategic Sites and Corridor Study):	Parramatta Road Corridor Urban Transformation Strategy 2016; Leichhardt Industrial Land Study 2014; Leichhardt Industrial Precinct Planning 2016
Site visit undertaken:	27 August 2018 and 1 November 2018
Site Description/Context	<p>67-75 Lords Road, Leichhardt is a regular shaped lot, 10,691 sqm in area and located in the West Leichhardt precinct of LDCP. The site comprises two allotments and is located on the northern side of Lords Road, with public open space, public roads or railway land adjoining the site on all boundaries. The site has a 77 metre frontage to Lords Road along the southern boundary and 76 metre northern boundary to Lambert Park. The eastern and western side boundaries comprise 111.3 metres and 133.24 metres respectively.</p> <p>The site is approximately 400m from Parramatta Road and 7km from the Sydney CBD. The site currently accommodates a range of light industrial and commercial uses including warehousing/storage, small scale manufacturing including furniture and joinery businesses as well as a private art school.</p> <p>The existing buildings on the site comprise three (3) buildings directly adjoining each other comprising two (2) storey brick and metal roof buildings as well as a detached single storey brick and metal roof building in the front eastern corner of the site. The maximum height of the existing buildings on the site is approximately 11.5 metres. Vehicle access is currently obtained from two driveways accessing the various businesses from Lords Road.</p> <p>The site is zoned IN2 Light Industrial in the LLEP and the maximum FSR for the site is 1:1. LLEP does not stipulate a height control for the site.</p>
Aerial photographs	

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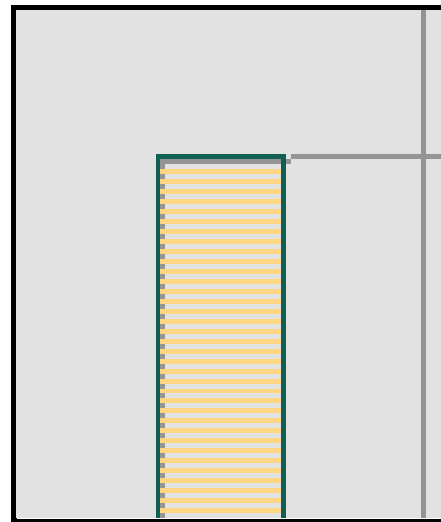
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Site photos/photomontage



2. Site Affectations (affecting whole or part of the site)	Y	N	Comments
Is the site a Heritage Item? If so insert Item Number(s).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site a Draft Heritage Item?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site Listed on the State Heritage Register?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site subject to an Interim Heritage Order?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site Listed as a Heritage Item in a State Environmental Planning Policy (includes SREPs)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site located within Conservation Area? If so insert name of the conservation area.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site in the vicinity of any Heritage Items? If so insert	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site adjoins heritage item I655 (House at 20-22 Foster Street

2. Site Affectations (affecting whole or part of the site)	Y	N	Comments
Heritage Item Number(s) and descriptions.			including interiors – in Lambert Park) and Item No I689 (Kegworth Public School including interiors) is located in close proximity to the site, being located across the road to the south-east.
What Acid Sulfate Soils Class(es) affects the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Class 5 area with Class 3 adjoining to the west (Hawthorne Canal)
Is the site Flood affected? (This includes tidal inundation)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is a flood control lot affected by a 1 in 100 year level and the PMF
Is the site located within the foreshore area (Foreshore building line)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site reserved for a public purpose?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
What Australian Noise Exposure Forecast contour located within?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No affectation, located outside ANEF 20
Is the site affected by any road widening or realignment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site or any part of the site reserved for acquisition?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is there an order under the Tree (Disputes Between Neighbours) Act 2006?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No
Is there a site compatibility certificate (Seniors Housing, Infrastructure, Affordable Rental Housing)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Is the site a Boarding House?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Does Council have information on the subject land relating to contamination and /or is the site identified on Council's GIS Contamination Layer on latitude? If so provide details.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Council has advice suggesting that 67-73 Lords Road is potentially contaminated.
Is the site located within close proximity to Port or Railway Land or any other land uses that could have adverse impacts upon the amenity of the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The light rail land with the SP2 railway zone adjoins the site to the west. Issues of noise and vibration can be considered in detail at DA stage.
Is there any site specific provisions (additional permitted uses) applying to the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Development Applications	Y	N	
Are there any recent or contentious development applications for the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

2. Site Affectations (affecting whole or part of the site)	Y	N	Comments
Outstanding Notices			
Are there any outstanding notices and orders applying to the subject site? Contact Rates.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No
Caveats or other property restrictions			
Are there any caveats or other property restrictions affecting the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Lot 1 DP 550608 is burdened by easements – ‘Easement for Electricity Supply’ and ‘Easement for Drainage and Access for Maintenance 6 Wide’. This affects the southwestern portion of the site.</p> 
S94 Contributions – Identify applicable plans			
Developer Contributions Plan No 1 – Open Space and Recreation (In operation from 18.1.05)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to Infrastructure discussion.
Developer Contributions Plan No 2 – Community Facilities and Services (In operation from 23.8.05)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to Infrastructure discussion.
Transport and Access Contributions Plan (In operation from 3.11.99)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Refer to Infrastructure discussion.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
REQUIREMENTS FOR ALL PLANNING PROPOSALS – A Guide to preparing Planning Proposals - Section 3.33 (2) of the EP&A Act					
Part 1 - Objectives and Intended Outcomes		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<p>The proponent's stated objectives or intended outcomes are considered to be unsatisfactory as discussed below:</p> <ul style="list-style-type: none"> • <i>'A guide to preparing planning proposals'</i> requires a short, concise statement setting out the objectives or intended outcomes of the planning proposal. It is a statement of what is planned to be achieved, not how it is to be achieved and written to allow it to be easily understood. • In this instance, the proponent's statement is considered to be descriptive and is not specific enough to accurately reflect the desired outcome of the proposal as required by the Guidelines. • The site is located in the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) area which recommends rezoning of the site from industrial to medium density residential. However, the Planning Proposal is inconsistent with a number of key recommendations of PRCUTS as detailed later in this report and consequently, should not be supported. 					
Part 2 - Explanation of Provisions		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The explanation of provisions is a more detailed statement of how the objectives or intended outcomes are to be achieved and should identify what zones or development standards are being proposed.</p> <p>While the proponent has addressed this requirement, the Planning Proposal is not supported for the reasons above and others detailed elsewhere in this report.</p>
Part 3 - Justification		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Planning Proposal does not provide sufficient justification for Council officers to support the Proposal as discussed below:</p>
Q1	Is the Planning Proposal a result of any strategic study or report?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The subject site forms part of the Parramatta Road Corridor. In December 2016, the State Government endorsed PRCUTS to facilitate renewal of the land in the Corridor.</p> <p>However, as discussed in detail further in this report, the</p>

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		Y	N	N/A	
					Proposal is inconsistent with the requirements of PRCUTS including the Implementation Plan 2016 - 2023, Out of Sequence Checklist and Planning and Design Guidelines and therefore, should not be supported.
Q2	Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The PRCUTS includes the Parramatta Road Corridor Implementation Toolkit which recommends that one of the pathways to implement the recommended land uses and development controls identified within the Strategy is the LEP Gateway (Planning Proposal) process.</p> <p>However, this Planning Proposal departs from the staging identified under the Implementation Plan 2016 – 2023 and comes in advance of studies underway at local and state government to inform future development controls for the Inner West Council local government area.</p> <p>The Proposal is considered to be premature in light of the imminent outcomes of strategic planning projects including the IWC Employment Lands Review, IWC Local Housing Strategy and comprehensive IWC LEP/DCP.</p> <p>Giving the relatively short term timing of outcomes from State and local strategies, it is recommended that the Proposal be considered as part of this broader strategic planning framework rather than as ad hoc Planning Proposal. This would ensure an informed approach when determining the future development of the site and surrounding area. It would also be best to defer the Proposal until the finalisation of the new comprehensive IWC LEP which should also align with the staging sequence recommended in PRCUTS Implementation Plan 2016 - 2023.</p>
Q3	Is the Planning Proposal consistent with the objectives and	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal has been considered against the

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	actions of the applicable regional, sub-regional or district plan or strategy including any exhibited draft plans or strategies? Consistency with relevant Strategies is demonstrated below:				priorities and objectives of the <i>Greater Sydney Region Plan 2018</i> (GSRP), <i>Eastern City District Plan 2018</i> (District Plan) and <i>Parramatta Road Urban Transformation Strategy</i> (PRCUTS). The PP is inconsistent with numerous objectives, Planning Priorities and requirements contained in these strategic planning documents. These issues are discussed in further detail below.
Greater Sydney Regional Plan 2018 (GSRP) – A Metropolis of Three Cities					
Direction 1: A city supported by infrastructure					
	Objective 1: Infrastructure supports the three cities.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A for this site.
	Objective 2: Infrastructure aligns with forecast growth - growth infrastructure compact <ul style="list-style-type: none"> Strategy 2.1 - Align forecast growth with Infrastructure. Strategy 2.2 - Sequence infrastructure provision across Greater Sydney using a place-based approach. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The GSRP emphasises a methodological and sequential approach. In particular, this Objective states that aligning infrastructure with growth requires a <i>methodical and sequenced approach to development</i>. It requires a whole-of-government approach and a place-based understanding of sequencing of infrastructure delivery, which is considered to enable planning to support infrastructure alignment with areas of growth and transformation before additional areas are rezoned and ready for development. This approach results in the staging plan for each of the Precincts of the PRCUTS.</p> <p>The PRCUTS Implementation Plan 2016 - 2023 guides and informs land use planning and development decisions in the short term between 2016 and 2023.</p> <p>The subject site is outside the '2016 - 2023 Release Area' for the Taverners Hill Precinct which means that the redevelopment of the site is expected to be in the medium to long term between 2024 and 2054. Proposals that depart from this staging and sequencing need to be considered against an 'Out of Sequence Checklist'. This</p>

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		Y	N	N/A	
					<p>Checklist aims to ensure that changes to the land use zone and development controls do not occur without meeting the underlying Principles and Strategic Actions of the Strategy such as enhanced public 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.</p> <p>An assessment of the proposal against the Out of Sequence Checklist is contained in Attachment 2.</p> <p>The Proposal should not be supported as it is inconsistent with the Checklist criteria and would result in a development that is out of alignment with infrastructure provision which is contrary to this Plan.</p>
	<p>Objective 3: Infrastructure adapts to meet future needs.</p> <ul style="list-style-type: none"> Strategy 3.1 - Consider the adaptability of infrastructure and its potential shared use when preparing infrastructure strategies and plans. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>This objective aims to "future proof" the provision of infrastructure. The provision for car sharing and plug in areas for electric cars would satisfy this objective which can be included in any redevelopment of the site.</p>
	<p>Objective 4: Infrastructure use is optimised.</p> <ul style="list-style-type: none"> Strategy 4.1 - Maximise the utility of existing infrastructure assets and consider strategies to influence behaviour changes, to reduce the demand for new infrastructure, including supporting the development of adaptive and flexible regulations to allow decentralised utilities. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The PP supports the use of existing infrastructure being located in close proximity to transport, public open space and commercial services.</p>
	Direction 2: A collaborative city				

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		Y	N	N/A	
	Objective 5: Benefits of growth realised by collaboration of governments, community and business.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The subject site is located in the Eastern City District Plan and is not within a Collaboration Area.
	Direction 3: A city for people				
	<p>Objective 6: Services and infrastructure meets communities' changing needs.</p> <ul style="list-style-type: none"> • Strategy 6.1 - Deliver social infrastructure that reflects the needs of the community now and in the future. • Strategy 6.2 - Optimise the use of available public land for social infrastructure. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proponent offers to make financial agreements for infrastructure provision at local and state level through the draft letter of offer to enter into a VPA, however the contributions and scope of works are considered to be too limited.</p> <p>The Planning Proposal comes in advance of Council's new s7.11 (formerly s94) contributions plan which intends to build financial capacity for provision of additional infrastructure in the Corridor area and support the future population in the Inner West LGA. Local infrastructure cannot be adequately levied for spot rezonings in the PRCUTS corridor until such time as IWC completes this new Section 7.11 Developer Contribution Plan.</p> <p>In the absence of this information, Council cannot make an informed decision regarding the redevelopment of the site or any site along the PRCUTS corridor. It is recommended that the Proposal not be supported until such work has been completed by Council.</p> <p>It is also noted that State Infrastructure Contributions (SIC) cannot be adequately determined at this stage as the Department has not yet introduced a State levy for redevelopments along Parramatta Road corridor. At this stage the Department has no plan to prepare a SIC Plan for the corridor.</p>

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					Should the Planning Proposal proceed to Gateway Stage, the Proposal must be conditioned to include satisfactory arrangement provisions for both State and Local contributions.
	<p>Objective 7: Communities are healthy, resilient and socially connected.</p> <ul style="list-style-type: none"> Strategy 7.1 - Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by: <ul style="list-style-type: none"> providing walkable places at a human scale with active street life prioritising opportunities for people to walk, cycle and use public transport co-locating schools, health, aged care, sporting and cultural facilities promoting local access to healthy fresh food and supporting local fresh food production. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal will result in a residential development which is close to public transport facilities, parks, services and open spaces.
	<p>Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods.</p> <ul style="list-style-type: none"> Strategy 8.1 - Incorporate cultural and linguistic diversity in strategic planning and engagement. Strategy 8.2 - Consider the local infrastructure implications of areas that accommodate large migrant and refugee populations. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not directly applicable to the site.
	<p>Objective 9: Greater Sydney celebrates the arts and supports creative industries and innovation.</p> <ul style="list-style-type: none"> Strategy 9.1 - Facilitate opportunities for creative and artistic expression and participation, wherever feasible with a minimum regulatory burden, 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Proposal is considered to be inconsistent with this objective as it will result in loss of industrial land and creative industries or uses that it currently houses, and has the potential to house in the future, under the existing zoning provisions of LLEP 2013.

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		Y	N	N/A	
	including: <ul style="list-style-type: none"> arts enterprises and facilities and creative industries interim and temporary uses appropriate development of the night-time economy. 				The site currently includes Art Est as well as other light industrial uses which contribute to the creative industries sector.
	Direction 4: Housing the city				
	Objective 10: Greater housing supply <ul style="list-style-type: none"> Action 3 Prepare housing strategies Action 4 Develop 6–10 year housing targets 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>This objective allows councils to deliver greater housing supply by preparing housing strategies, developing 6 - 10 year housing targets and identifying areas suited for urban renewal/ local infill development.</p> <p>To inform the preparation of housing strategies by councils, district plans provide housing supply targets for a 0-5 year timeframe by local government area. These five-year targets reflect the existing development pipeline and provide a focus for infrastructure delivery. This Plan sets a target of 46,550 homes for the 0-5 year target for the Eastern City while the Eastern City District Plan sets a 0–5 year housing supply target (2016–2021) of 5,900 dwellings for the IWC area.</p> <p>Councils are to work with the Greater Sydney Commission and State agencies to establish agreed 6-10 year housing targets for their local government area.</p> <p>The 6-10 year housing targets will build on the five-year targets and will be agreed with councils over the next 18-24 months in collaboration with the Greater Sydney Commission as councils develop their housing strategies and identify the right locations to meet their areas housing needs (i.e. proximity to transport and strategic and local centres for walkable neighbourhoods with access to jobs, schools and open space and</p>

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					<p>opportunities to optimise existing infrastructure).</p> <p>Planning for housing supply beyond 2026 is more strategic to allow for a range of changing circumstances and industry responses to market changes. Therefore the 20-year strategic housing targets at the district level provide the longer-term context for housing strategies.</p> <p>PRCUTS envisages the following growth for the Taverners Hill precinct:</p> <ul style="list-style-type: none"> No. of dwellings by 2023: 451 No. of dwellings by 2050: 1,350 <p>The subject site is located in the Parramatta Road corridor urban renewal area and has been recommended for rezoning from IN2 to R3. However, as discussed in the previous sections, the site is outside the 2016 - 2023 release area which means that the development of the site should occur over the medium to long term rather than in the short term.</p> <p>The rezoning of the site is not required to meet the Plan's short term housing supply target for Inner West LGA and in the absence of a housing strategy for the 6-10 year housing targets for the IWC area, it is considered that this PP cannot be supported at this time. Good strategic planning links the delivery of new homes in the right locations with local infrastructure which cannot happen when sites are developed out of sequence as is the case in this instance.</p>
	<p>Objective 11: Housing is more diverse and affordable.</p> <ul style="list-style-type: none"> Strategy 11.1 - Prepare Affordable Rental Housing Target Schemes, following development of implementation arrangements. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The PP involves the provision of affordable housing through the VPA. This involves the provision of 35 apartments within the development to be owned and managed by Bridge Housing for a minimum of 10 years.</p>

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	<ul style="list-style-type: none"> Strategy 11.2 - State agencies, when disposing or developing surplus and for residential or mixed-use projects include, where viable, a range of initiatives to address housing diversity and/or affordable rental housing. 				This is considered to be generally consistent with this GSRP objective which set a target of minimum of 5% affordable housing of new residential floor space created as a result of rezoning decision. There are concerns with the provision of this affordable housing not being owned by Council.
Direction 5: A city of great places					
	<p>Objective 12: Great places that bring people together.</p> <ul style="list-style-type: none"> Strategy 12.1: Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places by: <ul style="list-style-type: none"> prioritising a people-friendly public realm and open spaces as a central organising design principle recognising and balancing the dual function of streets as places for people and movement providing fine grain urban form, diverse land use mix, high amenity and walkability in and within a 10-minute walk of centres integrating social infrastructure to support social connections and provide a community hub recognising and celebrating the character of a place and its people. Strategy 12.2: In collaboration Areas, Priority Precincts and planning for centres.... 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The proposal will contribute towards the redevelopment of a site for residential dwellings which would be located close to public open spaces and transport services, thus contributing to the development of a great place.</p> <p>The revised design scheme in the future, and within the Action Plan staging process, could assist in the creation of a safe place with high amenity. In general, the PP achieves this Objective however, at this time it is considered out of sequence and with significant urban design issues to address.</p> <p>The site is not located in any Collaboration Area, Priority Precincts or centres.</p>
	<p>Objective 13: Environmental heritage is identified, conserved and enhanced.</p> <ul style="list-style-type: none"> Strategy 13.1: Identify, conserve and enhance environmental heritage by: 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The site is not located within a Heritage Conservation area nor does it contain a heritage item, however, a heritage item is located adjoining the site to the north (Lambert Park). A Heritage Impact Statement has been</p>

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	<ul style="list-style-type: none"> engaging with the community early in the planning process to understand heritage values and how they contribute to the significance of the place applying adaptive re-use and interpreting heritage to foster distinctive local places managing and monitoring the cumulative impact of development on the heritage values and character of places. 				<p>provided within the PP which concludes that there will be no adverse impacts on this heritage item.</p> <p>The Heritage Impact Statement does not adequately consider whether there will be any adverse impacts on the heritage value of the nearby heritage items including the item at Lambert Park and Kegworth Public School.</p>
Direction 6: A well connected city					
	Objective 14: A metropolis of three cities- integrated land use and transport creates walkable and 30-minute cities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The proposal will result in a residential development which is close to public transport facilities, parks, services and open spaces and can potentially contribute to the creation of a walkable place.
	Objective 15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to the site and the PP is not inconsistent with this Objective.
	Objective 16: Freight and logistics network is competitive and efficient.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to the site and the PP is not inconsistent with this Objective.
	Objective 17: Regional transport is integrated with land use.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to the site and the PP is not inconsistent with this Objective.
Direction 7: Jobs and skills for the city					
	Objective 18: Harbour CBD is stronger and more competitive.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in the Harbour CBD.
	Objective 19: Greater Parramatta is stronger and better connected.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in this area.
	Objective 20: Western Sydney Airport and Badgery's creek Aerotropolis are economic catalysts for Western Parkland City.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in this area.

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	Objective 21: Internationally competitive health, education, research and innovation precincts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in any of these precincts.
	Objective 22: Investment and business activity in centres.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in this area.
	<p>Objective 23: Industrial and urban services land is planned, retained and managed.</p> <p>Strategy 23.1: Retain, review and plan industrial and urban services land in accordance with the principles for managing industrial and urban services land.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Plan outlines three different approaches to manage industrial and urban services land including retain and manage, review and manage and plan and manage. The Plan recommends the '<i>retain and manage</i>' approach for all existing industrial land in the Eastern city district. This approach states (emphasis added):</p> <p><i>"Retain and Manage - All existing industrial and urban services land should be safeguarded form competing pressures, especially residential and mixed-use zones. This approach retains this land for economic activities required for Greater Sydney's operation, such as urban services. Specifically, these industrial lands are required for economic and employment purposes. Therefore the number of jobs should not be the primary objective rather a mix of economic outcomes that support the city and population."</i></p> <p>This retain and manage approach applies across the Eastern Harbour City.</p> <p>While it is acknowledged that the land subject of the PRCUTS is not subject to the industrial land strategies and actions of the ECDP, the Plan does also indicate that councils will be required to undertake a strategic review of industrial and employment activities as part of their review of their local environmental plan, to be approved by the Greater Sydney Commission. The Greater Sydney</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>Commission will monitor the performance of the principles to manage industrial and urban services land, including a formal review every five years.</p> <p>The Plan also states that the management of industrial and urban services land requires ongoing monitoring of changing industry needs, trends and new technologies. From time to time, controls may need to be reviewed to support the evolution of economic functions on industrial and urban services land and the diversity of activities within precincts.</p> <p>The Plan also notes that research prepared for the Greater Sydney Commission identified a benchmark requirement of 3sqm of industrial land per capita for urban services activities. The current and projected per capita level of provision in the Eastern Harbour City is already well below this benchmark. For these reasons, it is considered that a precautionary approach should be taken to this site, despite the exclusion of the PRCUTS area, given the significant loss of industrial land which has occurred in recent years.</p> <p>This objective has been assessed in detail in the report under the corresponding Priority of the ECDP.</p>
	Objective 24: Economic sectors are targeted for success.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP, with the exception of creative industries being a targeted sector, and the loss of such land capable of including creative industries. This is discussed in the context of Objective 23.
	Direction 8: A city in its landscape				
	Objective 25: The coast and waterways are protected and	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located on the coast and will not adversely

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	healthier.				impact on any waterways.
	Objective 26: A cool and green parkland city in the South Creek corridor.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in this catchment area.
	<p>Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced.</p> <p>Strategy 27.1 - Protect and enhance biodiversity by:</p> <ul style="list-style-type: none"> • supporting landscape-scale biodiversity conservation and the restoration of bushland corridors • managing urban bushland and remnant vegetation as green infrastructure • managing urban development and urban bushland to reduce edge-effect impacts. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The site is located near Hawthorne Canal and the GreenWay which is an urban green corridor. While the proposal provides an approximate setback of 50m to the canal and GreenWay, the setback to the western boundary is considered to be insufficient to accommodate medium to large size trees and vegetation and to augment the GreenWay. This setback is considered essential to provide soft landscaping and deep soil planting in order to enhance the outlook of the biodiversity corridor and public domain and to reduce the impact of the hardscape built form on the surrounding area.</p> <p>The proponent's concept design provides a 6m setback on the ground level to the western side boundary of the site. Greater setbacks are required to provide the green corridor along the GreenWay and enhance the environmental value of this area. There are also some trees proposed to be removed at the Lords Road and Davies Lane corner of the site which should be retained. These issues are considered below.</p>
	<p>Objective 28: Scenic and cultural landscapes are protected.</p> <p>Strategy 28.1 - Identify and protect scenic and cultural landscapes.</p> <p>Strategy 28.2 - Enhance and protect views of scenic and cultural landscapes from the public realm.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in an area of high scenic or cultural landscape.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	Objective 29: Environmental, social and economic values in rural areas are protected and enhanced.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located within the Metropolitan Rural Area (Figure 49 of GSRP).
	Objective 30: Urban tree canopy cover is increased. Strategy 30.1 - Expand urban tree canopy in the public realm.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	While the concept design provides additional landscaping opportunities both within and surrounding the site, including street tree planting, there are some concerns with the current planting regime. The proposal needs to comply with Leichhardt DCP C1.12 Landscaping, C1.13 Open Space Design within the Public Domain and C1.14 Tree Management as minimum standards. Relocation of the proposed green space from the centre of the site to adjacent to the GreenWay, to provide a larger, more meaningful green space which is connected to the GreenWay is required. In essence, Council supports 'Strategy 1 – Augment Greenway Corridor' of the Proponent's Urban Design Study. It is also considered that the all of the existing trees on the site are to be retained under the proposal. Further street trees with verge planting along Lords Road should be established.
	Objective 31: Public open space is accessible, protected and enhanced. Strategy 31.1 - Maximise the use of existing open space and protect, enhance and expand public open space by: <ul style="list-style-type: none"> providing opportunities to expand a network of diverse, accessible, high quality open spaces that respond to the needs and values of communities as populations grow investigating opportunities to provide new open space so that all residential areas are within 400 metres of open space and all high density residential 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Proposal in its current form does not sufficiently contribute towards the enhancement of public open space in the area. While the centrally located open space area on the site is to be publicly accessible, the lack of public interface is likely to result in it being a private space only.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>areas (over 60 dwellings per hectare) are within 200 metres of open space</p> <ul style="list-style-type: none"> • requiring large urban renewal initiatives to demonstrate how the quantity of, or access to high quality and diverse local open space is maintained or improved • planning new neighbourhoods with a sufficient quantity and quality of new open space • delivering shared and co-located sports and recreational facilities including shared school grounds and repurposed golf courses • delivering or complementing the Greater Sydney Green Grid • providing walking and cycling links for transport as well as leisure and recreational trips. 				
	<p>Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths.</p> <p>Strategy 32.1 - Progressively refine the detailed design and delivery of:</p> <ul style="list-style-type: none"> • Greater Sydney Green Grid priority corridors • opportunities for connections that form the long term vision of the network • walking and cycling links for transport as well as leisure and recreational trips. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proponent claims that open space and linkages will be provided along the site's western edge as part of a secondary GreenWay link with possible connection to the Marion Light rail stop. However, this has not been considered by the relevant authorities and therefore the likelihood of this eventuating is unknown. The applicant considers that the setback along this boundary would be part of this open space network. No provision has been made to ensure that this open space would actually be accessible for community use. The proposal in its current form does not make a sufficient contribution towards achieving this vision.</p>
Direction 9: An efficient city					
	<p>Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Planning Proposal provides a Sustainability Report which details how a future proposal could achieve</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	Strategy 33.1 - Support initiatives that contribute to the aspirational objective of achieving net-zero emissions by 2050 especially through the establishment of low-carbon precincts in Planned Precincts, Growth Areas and Collaboration Areas.				sustainability outcomes on the site. The site-specific Draft DCP also includes sustainability controls, including the following: <i>a. Development on the site is to target a Green Star Design and As Built v2.1 (2018) rating tool designed by the GBCA.</i>
	Objective 34: Energy and water flows are captured, used and re-used. Strategy 34.1 - Support precinct-based initiatives to increase renewable energy generation and energy and water efficiency especially in Planned Precincts and Growth Areas, Collaboration Areas and State Significant Precincts.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>b. Vegetation, green roofs, green walls and materials with a high solar reflectance index are encouraged on at least 50% of the surfaces of all buildings, with particular focus on western and northern building facades.</i>
	Objective 35: More waste is re-used and recycled to support the development of a circular economy. Strategy 35.1 - Protect existing, and identify new, locations for waste recycling and management. Strategy 35.2 - Support innovative solutions to reduce the volume of waste and reduce waste transport requirements.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Sustainability Planning Report provided with the PP is a generic and theoretical description of the potential sustainability measures which could be provided in the future redevelopment of the site. There are very limited references to the site or the proposal. There is no referencing or consideration of the sustainability requirements under the Sustainability Implementation Plan, one of several PRCUTS reference reports. The Proponent's Sustainability Planning Report does not address the Precinct specific sustainability targets nor does it address the car parking requirements of unbundled, decoupled and minimised car parking for the site. For the PP to be consistent with this Objective and PRCUTS, adequate provisions would have to be made in the LLEP 2013 or the associated letter VPA of offer to ensure that these sustainability targets would be

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		Y	N	N/A	
					achieved at the DA stage.
Direction 10: A resilient city					
	Objective 36: People and places adapt to climate change and future shocks and stresses. Strategy 36.1 - Support initiatives that respond to the impacts of climate change.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The PP is not contrary to this provision.
	Objective 37: Exposure to natural and urban hazards is reduced. Strategy 37.1 - Avoid locating new urban development in areas exposed to natural and urban hazards and consider options to limit the intensification of development in existing urban areas most exposed to hazards. Strategy 37.2 - Respond to the direction for managing flood risk in the Hawkesbury-Nepean Valley as set out in <i>Resilient Valley, Resilient Communities – Hawkesbury-Nepean Valley Flood Risk Management Strategy</i> .	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There are some natural hazards affecting the site including flooding and acid sulphate soils. These are considered to be adequately addressed in the studies and reports provided with the PP. The site is not located in the Hawkesbury-Nepean river catchment.
	Objective 38: Heatwaves and extreme heat are managed. Strategy 38.1 - Mitigate the urban heat island effect and reduce vulnerability to extreme heat.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The PP provides additional tree cover and in this way would contribute to reducing the heat island effect. Tree cover is addressed elsewhere in this report.
Implementation					
	Objective 39: A collaborative approach to city planning	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
	Objective 40: Plans refined by monitoring and reporting.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
Eastern City District Plan (ECDP) 2018					
Direction 1: A city supported by infrastructure					
	E1: Planning for a city supported by infrastructure.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Same as comments under GSRP Direction 1 (Objective

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	Action 3: Align forecast growth with infrastructure. Action 4: Sequence infrastructure provisions using a place-based approach.				2). The PP involves development on a site which is out of sequence and which does not satisfy the out of sequence checklist.
	Direction 2: A collaborative city				
	E2: Working through collaboration. Action 7: Identify, prioritise and deliver Collaboration Areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Same as comments under GSRP Direction 2. While the PRCUTS, initially developed by UrbanGrowth NSW, is described in the Plan as being collaboration between councils implementing the Strategy, and supported by the Commission, the site is not in a Collaboration Area.
	Direction 3: A city for people				
	E3: Providing services and social infrastructure to meet people's changing needs. Action 8: Deliver social infrastructure that reflects the needs of the community now and in the future Action 9: Optimise the use of available public land for social infrastructure	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Same as comments under GSRP Direction 3 (Objective 6). The Planning Proposal comes in advance of Council's new s7.11 (previously called s94) contributions plan which intends to build financial capacity for provision of additional infrastructure in the Corridor area and support the future population in the Inner West LGA. Local infrastructure cannot be adequately levied for spot rezonings in the PRCUTS corridor until such time as IWC completes this new Section 7.11 Developer Contribution Plan. In the absence of this information, Council cannot make an informed decision regarding the redevelopment of the site or any site along the PRCUTS corridor. It is recommended that the Proposal not be supported until such work has been completed by Council.
	E4: Fostering healthy, creativity, culturally rich and socially connected communities. Action 10: Deliver healthy, safe and inclusive places	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal will result in a residential development which is close to public transport facilities, parks, services and open spaces which satisfies Action 10.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>for people of all ages and abilities that support active, resilient and socially connected communities by:</p> <ul style="list-style-type: none"> a. providing walkable places at a human scale with active street life b. prioritising opportunities for people to walk, cycle and use public transport c. co-locating schools, health, aged care, sporting and cultural facilities d. promoting local access to healthy fresh food and supporting local fresh food production. <p>Action 11: Incorporate cultural and linguistic diversity in strategic planning and engagement</p> <p>Action 12: Consider the local infrastructure implications of areas that accommodate large migrant and refugee populations</p> <p>Action 13: Strengthen the economic self-determination of Aboriginal communities by engagement and consultation with Local Aboriginal Land Councils to better understand and support their economic aspirations as they relate to land use planning.</p> <p>Action 14: Facilitate opportunities for creative and artistic expression and participation, wherever feasible with a minimum regulatory burden, including:</p> <ul style="list-style-type: none"> a. arts enterprises and facilities, and creative industries b. interim and temporary uses c. appropriate development of the night-time 				<p>Actions 11, 12, 13 and 15 have not directly been catered for within the PP, although the PP is not necessarily inconsistent with them.</p> <p>The PP is considered to be inconsistent with Action 14 given it will result in the loss of industrial land that currently houses, and has the potential to house in the future, creative industries or uses under the existing zoning provisions of LLEP 2013 (Objective 9 in the GSRP). The site currently includes Art Est as well as other light industrial uses which contribute to the creative industries sector. While the PP suggests that such uses could be retained under the amended planning framework, compatibility with residential development (in terms of hours of operation, servicing, car parking and potential noise impacts) is unclear and unlikely.</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	economy. Action 15: Strength social connections within and between communities through better understanding of the nature of social networks and supporting infrastructure in local places.				
Direction 4: Housing the city					
	E5: Providing housing supply, choice and affordability with access to jobs and services. Action 16: Prepare local or district housing strategies Action 17: Prepare Affordable Rental Housing Target Schemes following development of implementation arrangements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Same as comments under GSRP Direction 4 (Objective 10). Good strategic planning links the delivery of new homes in the right locations with local infrastructure which cannot happen when sites are developed out of sequence. While the PP provides affordable housing consistent with Action 17, in general the PP is out of sequence and ahead of the Council's Housing Strategy, and is therefore inconsistent with this District Plan and the GSRP.
Direction 5: A city of great places					
	E6: Creating and renewing great places and local centres, and respecting the District's heritage. Action 18: Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places... Action 19: In Collaboration Areas, Planned Precincts and planning for centres.... Action 20: Identify, conserve and enhance environmental heritage Action 21: Use place-based planning to support the	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as comments under GSRP Direction 5 (Objective 12). The proposal will contribute towards the redevelopment of a site for residential dwellings which would be located close to public open spaces and transport services, thus potentially contributing to the development of a great place (Actions 18 & 21). The PP is considered out of sequence and with significant urban design issues to address.

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		Y	N	N/A	
	<p>role of centres as a focus for connected neighbourhoods.</p> <p>Action 22: Use flexible and innovative approaches to revitalise high streets in decline.</p>				<p>The site is not located in any Collaboration Area, Priority Precincts or centres (Action 19).</p> <p>The PP does not adequately address whether there are any adverse impacts to the heritage value of the adjoining and nearby heritage items and is therefore inconsistent with Action 20. The site is not located on a high street (Action 22)</p>
	Direction 6: A well connected city				
	E10: Delivering integrated land use and transport planning and a 30-minute city.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Refer below.
	Direction 7: Jobs and skills for the city				
	E7: Growing a stronger and more competitive Harbour CBD.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in the Harbour CBD.
	E8: Growing and investing in health and education precincts and the Innovation Corridor.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in any health or education precincts or an innovation corridor.
	E9: Growing international trade gateways.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in any trade gateway.
	E 10: Delivering integrated land use and transport planning and a 30-minute city.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Same as comments under GSRP Direction 6.
	E11: Growing investment, business opportunities and jobs in strategic centres.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not located in a strategic centre.
	<p>E12: Retaining and managing industrial and urban services land.</p> <p>Action 51: Retain and manage industrial and urban services land, in line with the Principles for managing industrial and urban services land in the Eastern City District by safeguarding all industrial zoned land from conversion to residential development, including conversion to mixed use</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No. See below.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>zones. In updating local environmental plans, councils are to conduct a strategic review of industrial land.</p> <p>Action 52: Facilitate the contemporary adaptation of industrial and warehouse buildings through increased floor to ceiling heights.</p>				
	<p>The Planning Proposal is inconsistent with the key objective of the ECDP which recommends that all industrial and urban services land in the Eastern District be protected from conversion to residential development including any form of mixed uses.</p> <p>The Plan however, excludes the Parramatta Road Corridor Urban Transformation Strategy area from implementation of this objective as it notes that extensive work has been undertaken to develop PRCUTS and therefore rezoning of industrial lands in PRCUTS can proceed. This poses a conundrum in relation to the approach of protecting existing industrial land across the Eastern District.</p> <p>Industrial lands across Greater Sydney are increasingly experiencing pressure for residential rezoning. This has become a challenge across the metropolitan area, particularly in the Eastern City where higher land values and proximity to transport and employment centres have driven the conversion of many inner city industrial precincts. The NSW Government have identified the need for a more 'protectionist' approach to industrial lands in response to deal with any further contractions in supply.</p> <p>Consequently, the GSRP and ECDP advocate a "retain and manage approach" for industrial land in the Eastern City District area except for the Parramatta Road Corridor. The District Plan elaborates on this point with a requirement that councils pursuing this approach should undertake a strategic review of industrial land as part of updating local environmental plans. This review is imminent, but will take some time for IWC to complete. Supporting a PP which rezones industrial land to residential without such a review process having been completed is considered to be premature.</p> <p>The GSRP states that in the Eastern Harbour City, there are many smaller industrial precincts which have a higher than average proportion of urban services activities. The Plan states that while these smaller industrial precincts may appear to be only a small part of the industrial land supply, they are important for providing urban services and, in some cases, creative industries (page 130). This is the case for the subject site. Interestingly, the GSRP also highlighted that their research identified a benchmark requirement of 3sqm of industrial land per capita for urban services activities was needed, however, the current and projected per capita provision in the Eastern Harbour City is already well below this benchmark.</p> <p>In the interim, a number of methods and existing policies can be deployed to assess industrial land rezoning proposals. These include Council's policies such as <i>Leichhardt Employment and Economic Development Plan (EEDP)</i> (2013), <i>Leichhardt Industrial Lands Study</i> (SGS, 2014), and the <i>Leichhardt Industrial Precincts Planning Report</i> (SGS, 2016). The <i>Subregional Industrial Precinct Review</i> prepared by HillPDA on behalf of the DPE as background to the GSRP and District Plans is also relevant. These plans and reports are considered in detail below.</p>				

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	Y	N	N/A	
<u>Leichhardt Employment and Economic Development Plan 2013-2023 (EEDP)</u>				
<p>The Leichhardt Employment and Economic Development Plan (EEDP) is a 10-year strategy for the future economic development of the Leichhardt LGA. Its purpose is to identify initiatives that can make a fundamental improvement to Leichhardt's economy.</p> <p>The EEDP identifies significant barriers to renewing the LGA's industrial precincts, including:</p> <ul style="list-style-type: none">the ongoing shift of light industrial, manufacturing and logistical businesses to Western Sydney locations that can offer better value premises that suit their needs (e.g. larger floorplates, better access for trucks)a mismatch between the needs of contemporary light industrial businesses and the characteristics and quality of the available space in the LGArelatively small lots and fragmented land ownershiplimited feasibility of making improvements to existing industrial sites due to low rental returns and significant capital expenditure requirements. <p>The Plan identifies seven Objectives for improving the vitality and viability of the local economy:</p> <ul style="list-style-type: none">Objective 1: Make place matterObjective 2: Meet people's needsObjective 3: Embrace the new economyObjective 4: Protect and leverage economic assetsObjective 5: Make business and employment easierObjective 6: Communicate and connect with partnersObjective 7: Tell the world <p>In terms of the current PP, Objective 4 to protect and leverage economic assets is particularly relevant. Council believes that this objective is important because it is essential that the LGA retains enough industrial land to meet the current and future needs of the local area. This Plan suggests that Council believes that this objective is important because it is essential the LGA retains enough industrial land to meet the current and future needs of the local area.</p> <p>The Plan suggests that Council can help the LGA's industrial areas adapt to changing market forces by permitting a broader range of uses in them, however, any policy decisions on increasing the flexibility of uses in nominated industrial precincts should be approached strategically</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist	Satisfactory			Comments
	Y	N	N/A	
				<p>and informed by thorough market research. Other factors such as amenity, privacy, traffic generation and urban design also require full consideration being given to the protection of key industrial lands. These issues are fundamental to the assessment of this PP given the proposal involves a variety of uses which may not necessarily be compatible.</p> <p>This Plan recognises that a more focused analysis of fragmented industrial lands in the LGA with respect to their suitability for a range of employment generating uses and in the context of the LGA's broader economic trends and needs is needed. This recommendation has three key components:</p> <ol style="list-style-type: none"> 1. A co-ordinated approach to reviewing sites (and where possible concurrent approach) to ensure an LGA wide perspective is maintained particularly in relation to the need for, and suitability of, the sites for various uses both today and in the future; 2. A consistent approach is achieved by reviewing the sites against standard criteria 3. Where sites are found to be surplus to requirements and proposed to be rezoned, their suitability against a range of alternative uses is considered. For example, their potential rezoning and use for creative industries, commercial office space or affordable housing. <p>The Plan advocates the use of standardised criteria which has been designed to qualify the suitability of sites from a quantitative perspective (i.e. is there enough industrial land to meet current and forecast demand), a qualitative perspective (i.e. does the industrial land have the attributes required by potential tenants) and from the perspective of economic viability (i.e. are industrial uses viable on the land).</p> <p>The Plan establishes such criteria against which proposed rezoning of industrial land should be assessed with rezoning proposals that can best respond to the criteria considered to have merit. For this PP, consideration of this criteria found the following:</p> <ul style="list-style-type: none"> • <i>Would the rezoning result in insufficient land industrial land being available for current and future demand for industrial land in the LGA, at a minimum?</i> - Former Leichhardt Council's Industrial Lands Study 2014 and Industrial Precincts Planning Report 2016 recommended protection and intensification of industrial sites in the local area due to a shortage of industrial land at the sub-regional level as outlined above. It is forecast that the LGA will not have sufficient land within existing precincts to accommodate the future demand of 63,094 sqm by 2036. The area is projected to have a shortfall of between 7, 570sqm and 54,965sqm by 2036. <p>While the PP advocates that given industrial uses have steadily declined and/or moved further west, that only land for 'services employment' is now needed in these types of locations, this ignores the land required for population serving services such as motor mechanics, joiners, panel beaters and the like. Such uses are still required close to the population which this site can provide. It is clear that there has been a shift to a service style employment structure, however, other industrial land, albeit light industrial, is still needed in city locations such as this site.</p> <p>The rezoning of the site under this PP would contribute to this loss of industrial land and fails to adequately protect industrial land to</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>accommodate this unmet future demand. The PP does not achieve this criterion.</p> <ul style="list-style-type: none"> <i>Would the rezoning of the site result in the fragmentation of a larger industrial precinct or erode the viability of a locally or regionally significant industrial precinct?</i> – The PP would result in the total loss of this industrial precinct given its relatively isolated nature and small size. The PP does not achieve this criterion. <i>Would the rezoning be consistent with adopted Council and/or State Government Policy regarding the future role and demand for industrial land? What impact would it have on Council's employment targets?</i> – The total loss of the site for industrial is contrary to Council's policies on Industrial land including Leichhardt Council's Industrial Lands Study 2014 and Industrial Precincts Planning Report 2016. The PP would also significantly constrain the achievement of Council's employment targets. While the PP advocates that this site is not required to achieve the PRCUTS employment targets, this is incorrect. This land is needed until at least 2024 (that is, in the medium to long term) as employment land. The PP does not achieve this criterion. <i>Does the site(s) have characteristics required by light or high tech industrial uses and other uses permitted in the zone/seeking floor space in the LGA or subregion (e.g. floor space, access, proximity to economic infrastructure, parking, infrastructure, storage, building configuration and land value)?</i> - The site is a highly valued site for industrial development given its proximity to transport, services and the population. Given its isolated nature, being located adjoining public open space, laneways and roads and the light rail corridor, it is likely to have minimal impact on surrounding residential development. The PP does not achieve this criterion. <i>Would it be economically viable to improve the site to attract new tenants or to adapt to changing industry requirements and to ensure that the land uses on the site address compatibility with surrounding uses?</i> – The site could be redeveloped to cater for the continuation of the existing uses on the site. It is considered that the existing industrial use of the site has limited impacts on the surrounding residential area as outlined in the Industrial Precincts Planning Report and would assist in meeting the future industrial land demand in the LGA. The PP does not achieve this criterion. <i>Would the retention of industrial uses on the site result in a positive net benefit to the community as a whole?</i> – Yes, the retention of industrial uses on the site would result in a net benefit to the community given it would provide a location for urban services and population-serving industrial uses close to the population and provide local employment opportunities. The PP does not achieve this criterion. <p>Accordingly, it is considered that the PP is inconsistent with the EEDP and therefore should not be supported.</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist	Satisfactory			Comments
	Y	N	N/A	
<u>Industrial Lands Study (SGS for Leichhardt Council, 2014)</u> <p>The former Leichhardt Council's <i>Industrial Lands Study</i> (2014) and <i>Industrial Precincts Planning Report</i> (2016) recommended protection and intensification of industrial sites in the local area due to a shortage of industrial land at the sub-regional level. Given Leichhardt's relatively low provision of industrial land, it is forecast that the LGA will not have sufficient land within existing precincts to accommodate the future demand of 63,094sqm by 2036. Even within various scenarios that test degrees of development within these precincts, Leichhardt is projected to have a shortfall of between 7,570sqm and 54,965sqm by 2036. Leichhardt's proximity to the Sydney CBD, improving transport links and identified development possibilities within the Bays Precinct and the Parramatta Road Corridor, means that the LGA's remaining industrial land is under increased pressure to develop for non-industrial uses, in particular residential. While residential development is important right across Metropolitan Sydney, so too is the protection of industrial land to service a growing population.</p> <p>This report makes a number of recommendations including that all of Leichhardt's industrial lands are to be retained and protected from re-zoning, that additional industrial floor space be provided and that Council's planning controls be revised to facilitate the protection and growth of industrial precincts.</p> <p>In relation to the Lords Road site, this Study recommended protection of the industrial nature of the Lords Road precinct from rezoning to residential or permitting any sort of non-industrial activity. It further stated that any proposed rezoning would result in the loss of floor space which would impact on the LGA's capacity to achieve the subregion/region and LGA employment capacity targets and employment objectives and place pressure on other limited industrial and business zones to deliver employment increases.</p> <p>This Study stated the following in relation to this site:</p> <p><i>"The precinct backs onto a sports field and the light rail line, meaning that its industrial functions have minimal impact on the surrounding residential area. This makes the site ideal for a range of industrial functions.</i></p> <p><i>Although small, the Lords Road Precinct contributes a large floorplate site to the light industrial make up of Leichhardt's employment lands. In a predominantly residential area, this lot and building size, coupled with its relative isolation from surrounding residential uses, makes it an important precinct to accommodate the future industrial demands within the LGA".</i></p> <p>There were two recommendations which are relevant to the current PP and associated actions which include:</p> <ul style="list-style-type: none">• <i>Recommendation 1: Protect Leichhardt's industrially-zoned precincts for their important employment and service functions.</i><ul style="list-style-type: none">▪ <i>Action 1.1 - Refuse any proposal to rezone land from Council's small pool of industrial land within any of the industrial precincts.</i>• <i>Recommendation 4: Ensure adequate provision of industrial land for population-serving industries</i><ul style="list-style-type: none">▪ <i>Action 4.1 - Maintain current provision of IN2-zoned land</i>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist	Satisfactory			Comments
	Y	N	N/A	
				<p>Accordingly, this Study recommends retaining the industrial zoning on the site.</p> <p><u>Industrial Precincts Planning Report (SGS for Leichhardt Council, 2016)</u></p> <p>SGS Economics and Planning was subsequently engaged by the former Leichhardt Council in 2015 to undertake an investigation into Leichhardt's industrial precincts and provide recommendations for the future planning and management of the LGA's industrial zoned (IN2) land.</p> <p>Leichhardt has a relatively small amount of industrially-zoned land, with approximately 100 hectares or 7% of the subregion's total. Although already small, Leichhardt's industrially-zoned land is continuing to reduce. Between 2011 and 2015, Leichhardt saw a net loss of almost 5 hectares, 4.5% of the LGA's 2011 total which, coupled with Leichhardt's small amount of industrial land and neighbouring Marrickville's similar amount (170 hectares in 2015) has meant that continued demand, in particular for population-serving industries such as self-storage services or automobile maintenance and repairs, are facing increasing pressures.</p> <p>The Report identified four key issues that impact on Leichhardt's industrial precincts:-</p> <ol style="list-style-type: none"> 1. There is a shortage of industrial land at a subregional level. 2. There is a shortage of local services within Leichhardt. 3. There is a need to provide sufficient floor space and appropriate built form configurations to support emerging uses. 4. Industrial precincts are under threat from other uses. <p>This report considered that the proposed precincts within the PRCUTS will place significant pressure on Leichhardt's existing industrial lands given the strategy (which was draft at the time of this report) proposed to replace with more mixed use and residential land use. This study presented two options for Council to consider in managing its industrial precincts. Option 1 was a 'business as usual' approach which assumed that the risk of precinct fragmentation and land use conflicts from rezoning industrial land was too great and therefore all industrial land was protected. Option 2 was a policy change for key precincts, which assumed a scenario where pressure from the State Government to redevelop the Parramatta Road Corridor (under the PRCUTS) required Council to take a lead in considering alternative land use arrangements or Council wishes to consider options that may deliver additional floor space. This option was not without risk and it sought to safeguard the remaining smaller precincts across the LGA from redevelopment.</p> <p>In relation to the Lords Road site, both options recommended the retention of the industrial zoning on the site, contained in Strategy 1 (Action 1.1) and Strategy 6 (Action 6.1).</p> <p>The Study provided the following summary of the site in terms of land use and built form (emphasis added), also noting that the dominant class of industry are local services:</p>

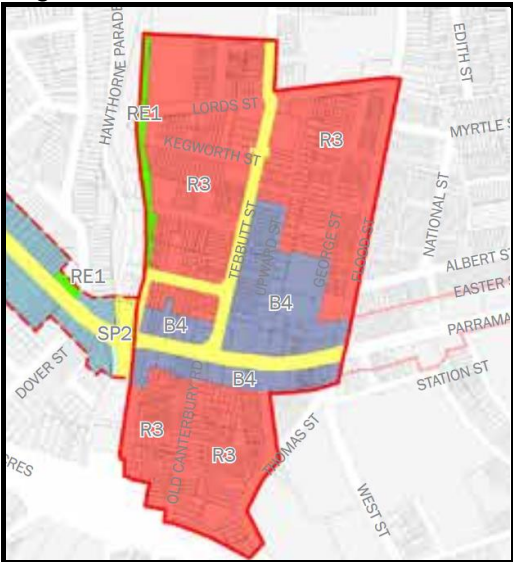
3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p><i>The Lords Road precinct is comprised of two lots and two buildings, one being a large floorplate development with a local light BLC. The 11,111sqm of local light floor space equates to 7% of the local supply.</i></p> <p><i>The trees along Lords Road effectively screen the precinct from the street. Current uses are predominantly local service industrial (warehousing, small scale manufacturing) with some 'dispersed' activities (such as a martial arts school, church, arts auction rooms). The precinct backs onto a sports field and the light rail line, meaning that its industrial functions have minimal impact on the surrounding residential area. This makes the site ideal for a range of industrial functions.</i></p> <p><i>Although small, the Lords Road Precinct contributes a large floorplate site to the light industrial make up of Leichhardt's employment lands. In a predominantly residential area, this lot and building size, coupled with its relative isolation from surrounding residential uses, makes it an important precinct to accommodate the future industrial demands within the LGA.</i></p> <p><u>Subregional Industrial Precinct Review (Hill PDA, 2015)</u></p> <p>In 2015, Hill PDA was commissioned by DPE to undertake a review of a number of industrial precincts across Sydney to support the development of the district plans for the North, Central and the South Subregions. These subregions accommodate 135 key industrial precincts, of which the Lords Road site is included. The report scored the precincts across three criteria including investment and business, location, function, and connections and economic output and jobs. This Study did not purport to forecast future demand for industrial land by Subregion but rather was to contribute to the evidence base by assessing the economic value and 'health' of the precincts as employment generating clusters. By undertaking this assessment, a comprehensive subregional and in turn local approach could be prepared to either enhance the industrial success of each precinct or re-address them through appropriate planning controls.</p> <p>Accordingly a Precinct that scored well with respect to economic output and employment generation may not necessarily be the largest in scale or best located and therefore may not rank as well across the three criteria as other precincts. However, these precincts can be considered of value owing to the role they play in supporting a given locality.</p> <p>The Lords Road site was identified as an 'Inner City Fragment' site and was scored as below average across all three categories (scoring 25 in each category) for a total of 7.5. However, looking at the criteria, this site scored low due to its small size and location within Leichhardt which was highlighted as a very small industrial pocket, which was in lower demand by larger users. This was largely due to the high price barrier, and difficult access and manoeuvrability in and out of the Precinct. The Study indicated that small local industries (furniture storage and renovation, printerries, food production and creative industries) would however flourish in this location, given the nearby local demographic, but the cost of land would be a key challenge.</p> <p>Demand for industrial space across the North, Central and South Subregions was greatest for smaller factory and office/warehouses (under 500sqm). Users typically ranging from small service industrial businesses to non-regular, non-specialised industries such as small printers, car</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>repairs, builders and wholesalers. These types of premises were in demand for purchase by both owner occupiers and investors, typically for small and medium superannuation fund (SMSF) purposes, the latter favoured strata title units rather than stand-alone factories.</p> <p>The Study noted that smaller parcels of industrial land had been rezoned in more isolated rezonings, which had placed such sites (like the site of this PP) under greater pressure to be rezoned, resulting in land speculation. This has then made some areas unviable for industrial uses when in fact they still provide a strong service to the local community and the Subregion. The study also found that the industrial area at Leichhardt was highlighted as a potential area by Agents for rezoning, due to its small size and residential surroundings. This appears contrary to another finding of this Study which was that the Central Subregion contained a stronger price-driven demand for smaller industrial space (under 500 sqm), with larger spaces (over 2,000 sqm) moving further west for manufacturing and larger warehousing types of uses.</p> <p>In this regard the Study found that the size of a local industrial precinct is an important factor in its long-term success. Smaller Precincts have tended to suffer from a lack of demand whilst redevelopment is more viable in areas with larger land sizes per block. It appears from this study that since this site scored poorly, it should be rezoned to residential under the PRCUTS. However, such a finding seems to be contrary to the other main findings of this Study which included that demand for industrial space across the subregions was greatest for smaller factory and office/warehouses (under 500sqm) and that urban services and employment serving uses were in great demand, particularly in locations close to the local population. In this way, this Study suggests that the site should not be rezoned.</p> <p><u><i>Sydney's Urban Services Land: Establishing A Baseline Provision (SGS, July 2017)</i></u></p> <p>This Study was prepared for the Greater Sydney Commission for the purpose of regional and district planning. The Study outlines the term 'Urban Services', which is used to describe a wide range of industries that locate in cities. This study defined Urban Services as a collection of industries that <i>enable the city to develop and its businesses and residents to operate</i>. Urban Services tend to have particular land use, floor space, operational or accessibility characteristics that require them to locate in specialised areas.</p> <p>Unlike some industrial uses such as manufacturing or freight and logistics, which often choose to locate on the urban fringe, urban services often serve a local population or support a nearby commercial centre. Consequently, they rely on proximity to these markets. They serve a wide range of functions but broadly, they enable other businesses and industries to operate, infrastructure to be maintained and residential populations to be supported. While they are not always high employers, their value is not held in how many jobs they directly provide, but in the operational role and function they play throughout the city.</p> <p>In relation to the Central region, the Study stated the following (emphasis added):</p>				

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		Y	N	N/A	
	<p>Central is already below the benchmark of three square metres of urban services land per capita, and this provision is expected to fall by 2036. It also has more urban services jobs outside of these precincts than in. The District's industrial and business zones that accommodate urban services are already constrained – the District has the second-lowest provision of urban services-focused industrial land in the Metropolitan region. It faces competition from a range of other land uses seeking to benefit from their CBD proximity and transport accessibility. Many of the District's precincts are also home to non-urban services industries that seek proximity to major infrastructure (airport and port) and the CBD. Many require these locations for their business operations and will compete for the District's finite industrial land. Central's remaining industrial lands must be carefully managed to ensure sufficient space for urban services and other location-sensitive industries to grow.</p> <p>STATUS: UNDER PRESSURE</p> <p>The Study also stated that industrial precincts which house urban services varied in size, however, stressed the importance of the smaller industrial precincts for these urban services. The Study also outlined that land values play a role in the availability of zoned land, with high land values increasing rents which can lead to businesses making trade-offs between floor space and location. However, across Greater Sydney, and particularly in the eastern Districts of the Central, North and South, these smaller precincts support high proportion of urban service jobs that often support local populations and economies. Precincts between 750sqm and 10,000sqm have a high percentage of their land attributed to urban service jobs. As precincts increase in size, this proportion reduces. Therefore, this Study indicates that the subject site is the appropriate size for urban services and is located within an area which already has a shortfall in this type of land use.</p> <p>The Study concludes by stating that the demand for urban services is closely linked to population and business location and that this analysis demonstrates that in Sydney's East (Central, North and South Districts), relatively low supply and high populations requires a cautious approach to industrial land management. The Study emphasises that a 'one size fits all' approach is too broad and that:</p> <p><i>"....a cautious approach, particularly in the Eastern and Central Cities, is urged to ensure that there is sufficient zoned land to meet not just the future demand within these precincts, but to safeguard against rising land prices and land use conflicts driving urban services and other industries away from the areas that they support".</i></p> <p>Accordingly, this Study supports the retention of this site in its current zoning and use, particularly for the provision of urban services land given its size, its location within the Central region and the proximity to the surrounding population.</p> <p><u>Metropolis that Works (GSC, 2018)</u></p> <p>The GSC has prepared a thought leadership paper in relation to the challenges Greater Sydney faces in best managing its industrial and urban</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>services lands. The Paper states that Sydney's industrial precincts are valuable and strategic places that need to be recognised as such in regional, district and local environment plans. The paper expands on the industrial lands policy that has been adopted under the Greater Sydney Region Plan and explains the need to find a balance between competing land use needs to ensure that not only are we meeting housing demand, but jobs, industry and urban services are maintained to keep the city working. The Paper responds to the changing nature of industrial urban services and their spatial requirements, their strategic value and the essential role they play in Greater Sydney as set out in Objective 23 of the GSRP which states "<i>Industrial and urban services land is planned, retained and managed</i>".</p> <p>Key considerations highlighted by the Paper which are of relevance to this PP include:</p> <ul style="list-style-type: none"> • <i>A growing city needs to be a working city. It needs spaces that allow it to function, make and create</i> – The paper explains that there is a need to value industrial land for its purpose which is to serve the growing population, since jobs and places to make, fix and repair things is needed. It is less coherent in accommodating the complexities of spatial dependences and networks, displacement and the role of industrial places as strategically significant spaces and places. Importantly, the Paper also outlines that industrial precincts in Greater Sydney remain in demand. This is also illustrated in the HillPDA report for the GSRP and District Plans outlined above in which such areas, large and small, are required across the wider metropolitan area. The Paper also outlines the importance of these industrial areas for creative industries and the need to make these places affordable and the importance of connections to local markets across all parts of the city. The likely incompatibility of mixed uses and encroaching residential development into 'working spaces' is also raised. This is due to the likely impacts arising from hours of operation, noise, servicing and the like as well as land pricing which will undermine retention of employment uses over time. • <i>The value of industrial and urban services land should not be based only on the volume and types of jobs generated, but to the operational role and function it plays throughout the city-</i> the Paper points out that <i>industrial spaces are vital to the function of cities, however, the market often does not value them appropriately</i>. The Paper states that zoning can be seen as subsidising those spaces, and if the rationale is market failure, then urban economists' follow-up question is often, "are there other ways (i.e. not through zoning) in which those failures can be corrected". In essence the Paper says that these spaces need to be valued for the role they play in the city and not necessarily by land value or the zoning mechanisms. This seems at odds with the Hill PDA study (2015) which seemed to rank precincts on their output, job creation and size rather than what they contributed to the area. This is concerning given that the study was used as a basis for recommending rezoning of the subject site to residential. In accordance with this Paper, the site of this PP would be ascribed a higher value given it's intrinsically useful to the local area given the local jobs and services which it creates. Accordingly, it is likely that this Paper would recommend against rezoning the site from industrial to residential. • <i>The provision of sufficient industrial land with access to markets and users across the whole metropolitan area is integral to delivering the 30-minute city</i> - the Paper requires that greater strategic consideration is to be given to precincts as networked places, operating 				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>across and deeply embedded within a range of spatial scales. This refers to the need to retain industrial land across a range of places given the importance of such services being closer to population and other networks for their businesses. Further, the Paper states that the spatial scale of operation and locational imperatives has remained firmly anchored, and indeed the importance of local proximity has heightened. This extends to the Lords Road site, in which both the Leichhardt Industrial Precincts Planning Report and the Industrial Lands Study acknowledged that this site was primarily providing local services and accordingly, its proximity to the population and its local position remains vital.</p> <ul style="list-style-type: none"> • <i>Industrial precincts should be identified as valuable and strategic places in Region, District and Local Environment Plans</i> – the Paper makes it clear that all cities need an intelligent approach to land use decisions which support a functioning city, indicating that industrial and urban services land is an integral component of the city. Relinquishing it in the face of shorter-term imperatives is likely to be costly in the long term because once the land has moved to a higher value use; it is highly unlikely ever to be converted back. The Paper goes so far to say that industrial and urban services are an integral component of a healthy, functioning and productive urban system, where we build, fix and repair things, supply the goods required for all these activities as locally as possible. <i>We need to hold onto them.</i> This PP is contrary to this major theme of this paper as is the PRCUTS insofar as it proposes to rezone the site to residential. The Paper also raises the point that the rezoning of industrial land is also happening due to their undervalued nature as opposed to residential. • <i>A 'no regrets' approach is required in any decisions affecting industrial and urban services land, with the ramifications of any displacement of activity fully understood and strategically managed</i> - the Paper makes it clear that a 'no regrets' decision making principle needs to drive all levels of decision making, highlighting that once industrial lands are lost in high land-value cities, they are hard to get back. In such circumstances, the Paper indicates that it makes good sense to retain, manage and plan for those lands. This decision making model is particularly important when lands are placed under pressure, or strategic arguments can be upheld in support of rezoning, then the 'no regrets' principle needs to drive all levels of decision-making. This principle needs to be applied in this case of this PP since the site cannot function effectively as an industrial site once residential uses are permissible. <p>It is considered that the PP should not be supported given it is contrary to the key considerations outlined in this Paper as outlined above.</p> <p>A Peer Review of an Economic Impact Analysis by SGS in March 2018 for Council for a PP to rezone industrial land to residential at 21-35 John Street, Leichhardt indicated that a significant amount of floor space has already been rezoned or removed from availability in the four years since 2014, being a total of 164,500sqm, or 12 per cent of total supply in 2014. This is largely due to the rezoning of the Victoria Road precinct which comprises approximately 114,400sqm, or 8.7 per cent of all industrial floor space within the LGA. Furthermore, a significant amount of industrial floor space is subject to planning proposals currently being assessed with 103,500sqm currently subject to planning proposals and 168,300sqm impacted by the Parramatta Road Corridor Strategy. This represents 20 per cent of total supply in 2014 (23 per cent of current supply).</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist	Satisfactory			Comments
	Y	N	N/A	
<p><u>Summary</u></p> <p>PRCUTS recommends rezoning of this site to Medium Density Residential (R3) (Refer to the image below) which is inconsistent with the objectives of GSRP, ECDP and Council's Industrial Precincts Planning Report; however at recent average dwelling sizes the PRCUTS dwelling targets for the Taverners Hill Precinct can be met and surpassed without rezoning this site.</p>  <p>Figure 1 - Extract from PRCUTS illustrating recommended zoning in the Taverners Hill precinct.</p> <p>There are key concerns regarding rezoning any part of Taverners Hill Precinct to allow residential or non-industrial uses. Encroachment of non-industrial uses would be inconsistent with Council's industrial land studies and other plans and policies are outlined above, which recommend retention of industrial uses. The Industrial Precinct Planning Report formed the basis of Council's comments to UrbanGrowth in relation to the strategy.</p> <p>Council support for this Proposal would be a departure from the consistently held strategic planning position to resist rezoning industrial lands for residential or mixed use purposes in the former Leichhardt Council LGA as outlined above. Any form of residential development within the site is likely to set a precedent for further development resulting in loss of urban services and employment generating land. Council will be</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	reviewing all its employment lands as part of the wider LEP integration work. In the context of imminent outcomes of strategic planning projects currently underway at both State and local level including the IWC Employment Lands Review and IWC Local Housing Strategy, the Planning Proposal is considered to be premature and therefore should not be supported. The site and its future uses should be planned holistically in the context of its contribution to the revitalisation of Parramatta Road Corridor.				
	E13: Supporting growth of targeted industry sectors.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is covered above.
	Direction 8: A city in its landscape				
	E14: Protecting and improving the health and enjoyment of Sydney Harbour, and the District's waterways.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly to the PP.
	E15: Protecting and enhancing bushland and biodiversity.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is located near Hawthorne Canal and the GreenWay which is an urban green corridor. However, the proposal does not locate the proposed open space along this boundary thereby reducing the potential for extending the GreenWay further. While the proposal provides an approximate setback of 50m to the canal and GreenWay, this setback along the western side boundary needs to be greater to allow for medium to large size trees and vegetation and provide an adequate setback to potentially a new pedestrian link to Marion Light rail stop in this area of the site. This setback is considered essential to provide soft landscaping and deep soil planting in order to enhance the outlook of the biodiversity corridor and public domain and to reduce the impact of the hardscape built form on the surrounding area.
	E16: Protecting and enhancing scenic and cultural landscapes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly to the site.
	E17: Increasing urban tree canopy cover and delivering Green Grid connections.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Same as comments under GSRP Direction 8 (Objective 30). The concept design provides additional landscaping opportunities both within site and surrounding the site

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		Y	N	N/A	
	<p>Action 65: Expand urban tree canopy in the public realm.</p> <p>Action 66: Progressively refine the detailed design and delivery of:</p> <ul style="list-style-type: none"> a. Greater Sydney Green Grid priority corridors and projects important to the District b. opportunities for connections that form the long-term vision of the network c. walking and cycling links for transport as well as leisure and recreational trips. 				<p>including street tree planting. The PP also includes adding to the GreenWay by proposing additional landscaping long the western side of the site adjoining the GreenWay.</p> <p>However, in terms of Objective 32 outlined above, the open space and linkages to be provided along the site's western edge as part of a secondary GreenWay link with possible connection to the Marion Light rail stop. Have not been adequately considered with the relevant authorities and therefore the likelihood of this eventuating is unknown. The applicant considers that the setback along this boundary would be part of this open space network. No provision has been made to ensure that this open space would actually be accessible for community use. The proposal in its current form does not make a sufficient contribution towards achieving this vision.</p>
	<p>E18: Delivering high quality open space.</p> <p>67. Maximise the use of existing open space and protect, enhance and expand public open space by:</p> <ul style="list-style-type: none"> a. providing opportunities to expand a network of diverse, accessible, high quality open spaces that respond to the needs and values of communities as populations grow. b. investigating opportunities to provide new open space so that all residential areas are within 400 metres of open space and all high density residential areas (over 60 dwellings per hectare) are within 200 metres of open space. c. requiring large urban renewal initiatives to demonstrate how the quantity of, or access to, high quality and diverse local open space is maintained or improved. d. planning new neighbourhoods with a sufficient quantity 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Same as comments under GSRP Direction 8 (Objective 31). The Proposal in its current form does not sufficiently contribute towards the enhancement of public open space in the area. While the centrally located open space area on the site is to be publicly accessible, the lack of public interface is likely to result in it being a private space only.</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	<p>and quality of new open space.</p> <p>e. delivering shared and co-located sports and recreational facilities including shared school grounds and repurposed golf courses.</p> <p>f. delivering or complementing the Greater Sydney Green Grid</p> <p>g. providing walking and cycling links for transport as well as leisure and recreational trips.</p>				
	Direction 9: An efficient city				
	<p>E19: Reducing carbon emissions and managing energy, water and waste efficiently.</p> <p>Action 68: Support initiatives that contribute to the aspirational objective of achieving net-zero emissions by 2050, especially through the establishment of low-carbon precincts in Planned Precincts, Collaboration Areas, State Significant Precincts and Urban Transformation projects</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Same as comments under GSRP Direction 9 (Objectives 33, 34 & 35). Further provision is to be made to ensure that the sustainability measures outlined in the PP would translate to the detailed design/DA stage.</p> <p>The Sustainability Planning Report provided with the PP is a generic and theoretical description of the potential sustainability measures which could be provided in the future redevelopment of the site. There are very limited references to the site or the proposal.</p> <p>There is no referencing or consideration of the sustainability requirements under the Sustainability Implementation Plan, one of several PRCUTS reference reports. The Proponent's Sustainability Planning Report does not address the Precinct specific sustainability targets nor does it address the car parking requirements of unbundled, decoupled and minimised car parking for the site. The PP is inconsistent with this Plan.</p>
	Direction 10: A resilient city				
	E20: Adapting to the impacts of urban and natural hazards and climate change.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

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			Y	N	N/A	
Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) 2016						
Policy Framework						
		Urban Transformation Strategy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The PP is inconsistent with Chapter 3 Vision and principles of the Strategy including the following:</p> <ul style="list-style-type: none"><i>Principle 1: Housing Choice and Affordability</i> – The proposal will contribute towards housing choice and diversity with a mix of 1, 2 and 3 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 as outlined in the Report. <p>In general, 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. 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.</p> <ul style="list-style-type: none"><i>Principle 2: Diverse and resilient economy</i> – the Strategy acknowledges that there is an insufficient supply of well-located industrial land in the corridor for certain kinds of demand and that

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>there will also be a strong role for employment and economic activity in the Corridor, given its strategic location and position within the heart of a growing population and close to the CBD. The Strategy also states that there is a need to review any barriers to job creation and consider policy levers at the local scale that may be available to accelerate or unlock job growth. The Strategy also notes the important role of urban support services, which should be incorporated into proposals.</p> <p>The site is an important source of employment land and is well located being essentially an isolated site adjoining the light rail, public open space and roads and laneways on the other boundaries. The site is therefore suitable to retain its largely light industrial use, with proximity to the population while also reducing potential amenity impacts due to its located adjoining the light rail line.</p> <p>Therefore, it is considered that the PP is contrary to this Principle given it removes industrial land.</p> <ul style="list-style-type: none"> • <i>Principle 3: Accessible and Connected</i> – This principle highlights that the Strategy will be implemented in two distinct stages, being 2016 – 2023 and post 2023 with land use change prior to 2023 being guided by the Parramatta Road Corridor Implementation Plan 2016 – 2023. Such land use change will be accommodated within planned improvements to Western Line rail frequencies and a rapid bus solution from

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>Burwood to Sydney. Investment such as longer term light rail or heavy rail solutions, currently being investigated, would be required to support the land use change beyond 2023. This principle outlines that this short term staged approach allows for the land use change to move in sync with the available transport capacity, whilst ensuring the scale, timing, and staging of longer term land use changes respond to Government transport investment.</p> <p>The PP does not sit within this sequencing given it is out of sequence with the action plan for Taverners Hill. The transport infrastructure is not in place to sustain this development at this time. Furthermore, the Precinct Wide Traffic Study required by Taverners Hill Action Plan has also not been completed.</p> <p>While the PP has the potential to contribute towards the achievement of sustainable travel by a shared pathway (pedestrian and cycle link) along the western site boundary to connect the site with the Marion Light Rail Stop, such a link has not been adequately demonstrated. There has been no consultation with the relevant landowners as to the acceptability of this link and there is no information on the dimensions of this connection or its location having regard to the Greenway, vegetation removal and the like.</p> <ul style="list-style-type: none"> • <i>Principle 4: Vibrant Community Places</i> – There are a number of concerns with built form

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>proposed for the site under the PP and there is a lack of detail regarding the proposed linkage to the Marion Light rail stop. There are also insufficient details regarding the prioritised pedestrian linkage along the Lords Road frontage of the site. The PP is also considered to be incompatible with the surrounding residential context which, in the short term, defined by the Strategy as up to 2023, will remain a low density residential area. Even in the medium term, between 2023 and 2036, the immediate area will comprise development only up to 17 metres in height. The lack of adequate setbacks to the corner of Davies Lane and Lords Road and the removal of trees in this portion of the site results in an inadequate relationship with the surrounding development. There are numerous urban design concerns raised as outlined in the Planning Assessment Report.</p> <p>The likely private nature of the central open space area will result in very limited public open space being provided on the site. It is also unclear as to the potential impact of the PP on the nearby heritage items located in Lambert Park and Kegworth Public School given the Heritage Impact Statement was considered unsatisfactory by Council.</p> <ul style="list-style-type: none"> • <i>Principle 5: Green Spaces and Links</i> – The PP does not sufficiently demonstrate that the proposed public open space on the site and local connection to other open spaces and public

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>transport has been provided. The removal of various trees on the site due to inadequate building setbacks, particularly in the south-east corner, does not achieve the required greening of the corridor as envisaged by the plan.</p> <ul style="list-style-type: none"> • <i>Principle 6: Sustainability and Resilience</i> - The Sustainability Planning Report provided with the PP is a generic and theoretical description of the potential sustainability measures which could be provided in any future redevelopment of the site. There are very limited references to the site or the proposal. There is no referencing or consideration of the sustainability requirements under the PRCUTS reference report Sustainability Implementation Plan. The Report does not address the Precinct specific sustainability targets nor does it address the car parking requirements of unbundled, decoupled and minimised car parking for the site. There are also significant trees to be removed under the current proposal. • <i>Principle 7: Delivery</i> – This Principle outlines that the Strategy aims to make decisions are made in a timely, transparent and coordinated way. The site for the PP is outside the area of the Implementation Plan 2016-2023. Therefore, the PP is out of sequence and ahead of numerous important strategies studies. This PP will not result in decisions being made in a coordinated way and is therefore contrary to the Principle of the Strategy.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>The Planning Proposal does not adequately contribute towards the following Key Actions:</p> <p><u>Land Uses</u></p> <ul style="list-style-type: none"> • <i>Encourage appropriately scaled residential development in select locations to attract and retain people in the core of the Precinct</i> – The PP is not considered to provide an appropriately scaled residential development in this location given the urban design concerns with the proposal. <p><u>Open space, linkages and connections:</u></p> <ul style="list-style-type: none"> • <i>Leverage new development to provide new open space and high-quality and active public domains</i> – While the PP provides open space in the centre of the site, it is unlikely that this will be utilised by the public given it has limited interface with the public domain. Such a location is unlikely to be used by the wider community. • <i>Capitalise on the proximity to light rail by providing increased connectivity for pedestrians and cyclists where possible</i> – While the PP proposes to make improvements to the public domain for pedestrian linkages across the Lords Road frontage of the site, there are no details of such linkages provided.
		Implementation Tool Kit				
		Implementation Plan 2016 - 2023	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Planning Proposal departs from the staging/sequencing identified under the Taverners Hill Action Plan 2016 – 2023 (Chapter 8). It also does not meet the criteria of the Out of Sequence Checklist as</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>detailed in Attachment 2 and therefore, should not be supported.</p> <p>The PP is inconsistent with the following:</p> <ul style="list-style-type: none"> • Strategic land uses – The out of sequence status of this PP may put at risk the immediate supply of industrial land given the only other area in the precinct which could provide employment is the mixed use area on Tebbutt Street and Parramatta Road. • Road improvements and upgrades – The Precinct-wide traffic study and supporting modelling required have not been completed. • Funding framework or satisfactory arrangements- The proponents Integrated Infrastructure Delivery Plan has applied out of date rates and costs; has not had any responses from key infrastructure agencies such as Sydney Local Health District to confirm their requirements; and has underestimated the likely number of dwellings and population in the proposed development at 235 dwellings rather than the more likely output of 300+ dwellings.
		Planning and Design Guidelines	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Planning Proposal is inconsistent with the following sections of the Part 3: Corridor Guidelines:-</p> <ul style="list-style-type: none"> • 3.1: Urban Structure – It is considered that the PP does not provide additional open space north of Parramatta Road that the location of the proposed open space will result in limited use by the public. • 3.2: Heritage & Fine Grain – the Heritage Impact

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>Statement provided with the PP does not adequately consider whether the proposal, which is in the vicinity of heritage items, is designed and sited to protect heritage significance.</p> <ul style="list-style-type: none"> • 3.4: Open Space & Public Domain – the PP does not adequately demonstrate consistency with these requirements given the proposed public open space is unsatisfactory in its current location and is not connected to the existing Green Grid network which in this instance is the GreenWay. • 3.6: Traffic and Transport – while the PP involves proposed upgrades to the public footpath along the Lords Road frontage, these measures are inadequately demonstrated in the proposal. • 3.8 Car Parking & Bicycle Parking - The PP does not satisfactorily consider the unbundled and/or decoupled parking arrangements contemplated under the PRCUTS and provides more car parking beyond the maximum outlined in this Strategy. • 3.9: Active Transport - The proposed connection to Marion light rail stop is supported, however, is inadequately demonstrated in the proposal. • 3.10: Sustainability & Resilience - The Sustainability Planning Report provided with the PP is a generic and theoretical description of the

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>potential sustainability measures which could be provided in any future redevelopment of the site. There are very limited references to the site or the proposal. There is no referencing or consideration of the sustainability requirements under the Sustainability Implementation Plan, one of several PRCUTS reference reports. The Proponent's Sustainability Planning Report does not address the Precinct specific sustainability targets nor does it address the car parking requirements of unbundled, decoupled and minimised car parking for the site. The PP is inconsistent with this Plan.</p> <p>The Planning Proposal is inconsistent with the following sections of the Part 4: Built Form Guidelines:-</p> <ul style="list-style-type: none"> • 4.1: Block Configuration and Site Planning (page 51) – The PP does not respond to the scale of surrounding buildings given the height exceeds the 30 metre maximum height and is not compatible with surrounding development, which would be approximately 17 metres or 4-6 storeys. Furthermore, the recommended planning controls in Clause 10.9 of P&UD Guidelines require that the area comprise low density residential comprising townhouses and terrace type dwellings. <p>The PP does not protect or enhance the valued character of the corridor as the excessive height of the buildings and the lack of articulation adversely affects the area. Buildings 2 and 4 are 55 metres long and Building 3 is 87 metres long. The proposed buildings along the Lords Road</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>frontage have no street setback and comprise up to 7 storeys.</p> <p>The PP does not arrange building forms to reinforce the future desired structure and character of the area as the height and scale of the development is unacceptable.</p> <p>The PP is unacceptable in terms of defining the street edge with low rise buildings to create a pedestrian scale at the street. The street frontage height of 3 and 5 storeys on a nil front setback in a future residential zone is unacceptable. While the upper levels are setback and larger buildings are towards the rear and adjoining light rail corridor, the distribution of bulk across the site is unacceptable in the context of the low density residential area.</p> <p>The PP raises potential issues for development on the southern side of Lords Road and eastern side of Davies Lane in terms of solar access and privacy.</p> <ul style="list-style-type: none"> • 4.2: Building Massing, Scale and Building Articulation (p 52-55) – The PP envisages a maximum height of up to 35 metres AHD and 9 storeys, which exceeds the maximum height under PRCUTS which is 30 metres or around 7 storeys. The PP is considered to be incompatible with the surrounding context which under the PRCUTS would comprise of buildings in the range of 4 to 6 storeys or 17 metres. While the PRCUTS sets a maximum height of 30 metres, this is only a maximum height and still requires

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>that future development responds to the scale of surrounding buildings and protects and enhance the character of the Corridor, particularly those elements that contribute to a sense of place and identity.</p> <p>The proposed buildings are not appropriately scaled to address and define the surrounding character of the area.</p> <p>Floor plates of the PP above 8 storeys are likely to exceed 750m² for Building 2 (9 storeys) inconsistent with the controls.</p> <p>The PP also exceeds the maximum building length of 60m for Building 3 (87 metres long) while Buildings 2 and 4 are close at 55 metres.</p> <p>The PP is also inconsistent with a number of the building articulation principles for the indicative site layout for buildings east of Hawthorne Canal (Figures 4.5 & 4.7):</p> <ul style="list-style-type: none"> • Communal open space on 6-7 storey buildings instead of low-rise buildings; • Upper level setback occurs at 3 storeys instead of 2 storeys; • Poorly defined street edge to Lords Road given nil front setback; • Setback above 3-4 Storey is not provided for Buildings 1 and 2; • Length of Building 2 is 87m contrary to maximum building length of 60m; • Building 2 and 4 both exceed the maximum wall length without articulation of 45m

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>(except for stairs). This limited articulation increases the bulk and scale of the buildings;</p> <ul style="list-style-type: none"> Insufficient information on materials and façade treatments. <ul style="list-style-type: none"> 4.3: Setbacks and Street Frontage Heights (p56) - The PP is inconsistent with the building setbacks and street frontage heights of Table 4.1 given the Lords Road frontage street wall height is 5 storeys on a nil front setback (when 3-6m is required), which is unsatisfactory and inconsistent with the guidelines. The frontage on the corner of Davies Lane and Lords Road has a 3 to 6 storey street wall height on a nil front setback also contrary to the Guidelines. <p>Limited pedestrian amenity due to a lack of adequate street setbacks and excessive street wall height for a low to medium density area.</p> <ul style="list-style-type: none"> 4.4: Transition Zones and Sensitive Interfaces (p57) - The PP is inconsistent with these controls which state that changes in height and scale will require transitions at the corridors edges, to heritage buildings and conservation areas and to adjoining existing low scale neighbourhoods. New development will be required to respond to the overall scale and form of existing elements or Precincts to preserve visual scale and to avoid overshadowing or loss of amenity. The PP is considered to be inconsistent with these controls as outlined below:

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<ul style="list-style-type: none"> ▪ Lords Road – requires compliance with Figure 4.13 (Local Street – heritage and all other conditions) – street frontage height of 14m and front setback of 3-6m is required. The PP is inconsistent with these controls given street frontage height is approximately 18m and with a nil front setback. ▪ Davies Lane – requires compliance with Figure 4.8 (transition to low rise across a lane) – street frontage height of 9m (3 storeys) and front setback of 3m. The PP inconsistent with these controls given street frontage height is 4 storeys. <p>Greater transitions and setbacks to the street are required as outlined above. Furthermore, the PP is not complementary in scale to surrounding lower density development currently existing as well as future surrounding development which is to be around 4-6 storeys.</p> <ul style="list-style-type: none"> • 4.5: Building Typologies (p59) – These controls require that development complies with the Apartment Design Guide. There is insufficient information and assessment of the ADG in this PP, particularly in relation to the public domain Interface, communal and public open space, apartment size and layout, private open space & balconies, common circulation & spaces, storage and facades. <p>It is also considered that the PP is contrary to the following controls of the ADG:</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<ul style="list-style-type: none"> ▪ <u>3B Orientation</u> and <u>4A Solar and daylight access</u> – Insufficient analysis of potential building envelopes with respect to potential overshadowing of adjoining properties as well as within the development. Availability of solar access available to the units inadequately demonstrated. ▪ <u>4S Mixed use</u> - It is unlikely that the non-residential uses which have been proposed, including employment uses, will be compatible with the residential development on the site. These impacts are likely to arise from noise, servicing and parking. There is insufficient information on layout and configuration of the non-residential uses to adequately consider if the commercial areas are appropriately configured. • 4.8: Amenity - the PP is inconsistent with some of these controls including that the central courtyard appears to be overshadowed for the majority of the day, with sunlight only reaching this area at 11am and 12pm in midwinter. There is also insufficient information provided to assess visual privacy for adjoining properties and within the site. <p>The Planning Proposal is inconsistent with the following sections of the Taverners Hill Precinct Guidelines:</p> <ul style="list-style-type: none"> • 10.4: Future Character and Identity as it does not encourage appropriately scaled residential uses nor retains the fine grain industrial character of the site. It is also unclear how this PP will affect

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>the proposed growth projections for homes and jobs and the proposed additional indicative land use mix balance of residential and employment GFA when it is out of sequence;</p> <ul style="list-style-type: none"> • 10.5: Open Space, Linkages and Connections and Public Domain - the PP does not provide connected open space areas since the proposed centrally located public open space area has limited frontage to the public domain. The prioritised walking link across the Lords Road frontage of the site, while envisaged in this proposal there is insufficient detail as to how this walking link will be achieved; • 10.7: Fine Grain Study Requirements - the PP is inconsistent with the siting and setback controls of Key Guidelines 5 and 6 for Taverners Hill since the ground level setbacks do not respond to the established street alignments of surrounding streets and the setback of upper levels does not reduce the visual impact of the built form to the streetscape; • 10.8 Green edge setbacks, Transitions and Activity and Commercial Zones - the PP is inconsistent with Sections 4.3 and 4.4 for setbacks and transitions of the Guidelines. • 10.9 Recommended Planning Controls <ul style="list-style-type: none"> ▪ Land use - The site is intended to be for medium density residential such a townhouses and terrace houses, however RFBs are proposed up to nine

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>(9) storeys.</p> <ul style="list-style-type: none"> ▪ Building Heights - The text states the height limit to be 32 metres however the plan indicates 30 metres. The PP is inconsistent with this height limit in that Building 2 exceeds this 30m height limit. ▪ Density - The PP involves 23,158m² of residential floor space, 2,500m² of non-residential floor space and 500m² of community floor space for a multi-use facility to be used in association with the APIA club and offered to Council. This is a total of 26,158m² over a site comprising an area of 10,691m². The resulting FSR is 2.44:1 which is inconsistent with the recommended FSR control in the PRCUTS.
		Infrastructure Schedule	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See below.
		<p>The Planning Proposal is supported by an <i>Integrated Infrastructure Delivery Plan</i> (IIDP) prepared by Northrop dated October 2018 (Attachment 15) which attempts to populate the Infrastructure Schedule for the Taverners Hill precinct. There are reservations about the methodology used, the formulas applied and conclusions of the IIDP. It is considered 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 infrastructure, transport and traffic studies necessary to update the 2016 cost estimates or capture the costs of infrastructure not covered by the Schedule.</p> <p>In this context, the Schedule acknowledges that it is based on a high level analysis of population, dwelling and employment projections for the Corridor and requires additional detailed investigation. Many projects described and listed in the Schedule require additional investigation and modelling. It is noted that the estimated costs included in the Schedule are frequently unrealistically low, out of date and have not been reviewed since June 2016.</p> <p>To illustrate this point the IIDP uses the PRCUTS Infrastructure Schedule "Prioritised Cycling Link" (this is for marked cycleways on an</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
		<p>existing road) costs of \$255.00 per linear metre for a 2.5m to 3m wide path. Even a basic path of this width costs \$1800 to \$2000 for design, lighting and construction. The Greenway Connections width design, lighting, landscaping, public art, recreation and public domain improvements have even higher construction rates. The link between Parramatta Road and Old Canterbury Road (excluding tunnels) will cost around \$8,000 per linear metre.</p> <p>Overall, it is noted that the proponent has underestimated the level of construction rates for projects listed, but not quoted in the Infrastructure Schedule. A detailed analysis of the proposed rates in the Infrastructure Schedule is provided below:</p> <p>More broadly Council's Property Capital Projects team current 2018 price level comments on the proposed construction rates (P34 of Attachment 15) cover the following issues:</p> <p>Active Transport Network</p> <ul style="list-style-type: none"> Items 1 –7: These works cannot be precisely estimated as the scope of works is broad and generic. Notwithstanding this the proposed base rate of \$225/m are very low and the recommended rate should be approximately \$350/m with some works such as site establishment being as high as \$950/ week. <p>Community Infrastructure</p> <ul style="list-style-type: none"> Item 8 Meeting and cultural space: Proponent's rate equates to \$2500/m² for a new building. This is very low and should be approximately \$3,500/m² or \$1.5m for a meeting space. Item 10 & 12 Childcare: Council recently completed a 60 places childcare building at Leichhardt park for \$3.5M. Using this rate would mean 36 places by 2023 equates to \$2.1M and 114 places by 2054 equates to \$6.65M. The rate quoted (\$1.4M) for 36 places and \$4.56M for 114 places is poor and probably excludes landscaping, furniture, fixtures and equipment. Item 11& 13 Outside of School hours: Should be the same as above. Item 16 Cultural Space: The comments on Item 8 are likely to apply to Item 16. <p>Road/ Intersection Upgrade</p>			

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
		<ul style="list-style-type: none"> Item 17: This rate cannot be adequately determined until the completion of RMS's and Council's precinct wide traffic modelling. <p>Open Space and Recreation</p> <ul style="list-style-type: none"> Item 18 – 21: 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 high. The rate should be almost double at around \$400/m2. <p>Public Transport Network</p> <ul style="list-style-type: none"> Item 22 Rail and Light Rail: TfNSW in their comments (Page 30 Appendix 2 Attachment 15) on the IIDP have pointed out that the PRCUTS required traffic study should be completed prior to any rezoning. The study is not complete and therefore, the proposed rates in the IIDP have no reliable foundation. <p>Taverners Hill Urban Amenity Improvement Plan</p> <ul style="list-style-type: none"> Items 23 – 24 – See the comment above about actual Greenway Construction costs. <p>There are also gaps in this Schedule which cannot be adequately determined until such time as Council implements a new local Contributions Plan. As a part of amending/ updating their local contributions plan, Councils are required to undertake additional analysis including audits of existing facilities and preparation of needs studies beyond the Corridor's boundaries.</p> <p>This core work is currently underway within Council's Urban Strategy team. In the absence of this critical information, Council officers are currently not in a position to critically comment on the proponent's calculations and rates. Support of this Proposal will compromise the holistic and inclusive basis of wider strategic planning projects underway at local and state government level and is likely to undermine the objectivity of Council's decision-making process.</p> <p>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.</p>			

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			Y	N	N/A	
		Urban Amenity Improvement Plan (UAIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	See below.
		<p>The UAIP is a \$198 million initiative attached to the Strategy, to be used to stimulate the transformation of the Corridor. The UAIP identifies a suite of early local amenity improvement works to be rolled out in various locations throughout the Corridor to help realise the vision and principles of the Strategy.</p> <p>The UAIP identifies the following works for the Taverners Hill Precinct:-</p> <ul style="list-style-type: none"> • Greenway connection under Parramatta Road; and • Greenway connection under Longport Street. <p>Neither of these projects directly affects the site.</p>				
		Reference Reports				
		Precinct Transport Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The following matters require consideration under this Report:</p> <p><u>Timing of Release/rezoning</u></p> <p>The PP is located outside of the staging area for 2016-2023 with this Report stating that investment such as longer term light rail or heavy rail solutions, currently being investigated, would be required to support the land use change beyond 2023 (Section 1.4).</p> <p>Furthermore, the Report indicates that further traffic modelling will be required for each Precinct as part of subsequent planning stages, including assessment of the cumulative impacts of the Strategy and working with TfNSW and the RMS to understand the changing Parramatta Road function and up-to-date opportunities to deliver or complement this.</p> <p>The Report also indicates that beyond 2023, population</p>

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			Y	N	N/A	
						<p>growth and transformation of the Corridor will need to be supported by longer term rail improvements and light rail options in order to proceed. The Government is currently investigating public transport options which will be required to support the scale, timing, and staging of longer term land use changes. Given the PP is out of sequence, none of these issues have been satisfactorily resolved at this time.</p> <p><u>Traffic Generation</u> From a transport and traffic perspective; based on information currently available, it is considered that the projected traffic volumes generated by the development (both the applicant's and Council's estimates) are generally at an acceptable level for the adjacent street network. In addition, as the precinct develops, public transport along Parramatta Road is likely to be enhanced and mode share should increasingly move towards more sustainable transport modes.</p> <p><u>Car Parking</u> The Report considers the future parking requirements for the area and locates the site within category 1 (High Accessibility Location) land. The Report emphasises that parking should be minimised, decoupled and unbundled where possible. The PP does not address these requirements and envisages a parking provision beyond the amounts outlined in Council's controls.</p> <p>The proposed design is for 235 apartments with the following car parking requirements and proposed provision:</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments			
			Y	N	N/A				
						Unit Type	No. of units	Max. parking rates (Precinct Transport Report)	Proposed car parking
						Studio	36	0	0
						1 bed	60	0.3 (18)	Not shown
						2 bed	103	0.7 (72.1)	Not shown
						3 bed	36	1 (36)	Not shown
						Commercial	3000m²	1/150m² (20)	20
						Total	235	146	270-310
						The PP indicates that the PRCUTS (146 spaces required), LDCP 2013 (159-261 spaces required) and the RMS Guide to Traffic Generating Developments (320 spaces required) all outline different car parking requirements. It is proposed to provide 270-310 spaces in a basement on the site.			
The PP has not indicated that unbundled or decoupled parking has been considered to further reduce car parking provision. 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.									
<u>Precinct Wide Traffic Study</u>									
The Report outlines future character and strategic transport network requirements for Taverners Hill (Sections 9.3 and 9.4) and requires the following:									

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p><i>Prior to any rezoning commencing, a Precinct wide traffic study and supporting modelling will be required to be completed which considers the proposed land uses and densities, as well as future WestConnex conditions, and identifies the necessary road improvements and upgrades that will be required to be delivered as part of any proposed renewal in the Taverners Hill Precinct.</i></p> <p>Future rezoning proposals should also model the impacts of future development on the Flood Street/Parramatta Road intersection in this context, in addition to any other intersections likely to be impacted.</p> <p>The Report also required that Prioritised Walking Links are provided for Lords Road between light rail line and Flood Street. The car parking provision for the site is also provided.</p> <p>While the PP addresses the prioritised walking link in a general sense, there is no Precinct Wide Traffic Study available which addresses the requirements of this Report which is required prior to any rezoning in the Precinct.</p> <p>This Planning Proposal comes in advance of this work being completed and therefore, should not be supported.</p>
		Fine Grain Study	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Proposal has been assessed in detail against these requirements in Attachment 2 Out of Sequence Checklist.</p> <p>The Planning Proposal does not adequately meet the</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						PRCUTS Fine Grain Study and therefore, should not be supported. The PP is contrary to the Key Guidelines 5 and 6 for Taverners Hill since the ground level setbacks do not respond to the established street alignments of surrounding streets and the setback of upper levels does not reduce the visual impact of the built form to the streetscape.
		Social Infrastructure Analysis Report	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The additional social infrastructure required for the Taverners Hill Precinct as identified in the Social Infrastructure Analysis Report forms part of the PRCUTS Infrastructure Schedule.</p> <p>This report does not directly affect the subject site and notes that the Taverners Hill Precinct is one of the smaller precincts along the Parramatta Road Corridor with a projected population of 5,516 by 2054. This additional community will only have slight impact on social infrastructure within the surrounding area.</p>
		Sustainability Implementation Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Sustainability Implementation Plan details the sustainability strategies and key development controls for the PRCUTS corridor and precincts. The Plan does this through built form sustainability strategies across building efficiency, renewable energy, strategic parking, public domain and sustainable infrastructure.</p> <p>The Sustainability Planning Report provided with the PP is a generic and theoretical description of the potential sustainability measures which could be provided in the future redevelopment of the site. There are very limited references to the site or the proposal.</p> <p>In effect, the Planning Proposal relies on a future Development Application to demonstrate consistency</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>with PRCUTS Sustainability and Resilience Principles. This is inconsistent with achieving the recommendations of the Strategy which requires a Planning Proposal to sufficiently demonstrate that it would achieve or exceed the sustainability targets as identified in PRCUTS.</p> <p>There is no referencing or consideration of the sustainability requirements under the Sustainability Implementation Plan, one of several PRCUTS reference reports. The Proponent's Sustainability Planning Report does not address the Precinct specific sustainability targets nor does it address the car parking requirements of unbundled, decoupled and minimised car parking for the site. The PP is inconsistent with this Plan.</p>
		Economic Analysis Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>This report does not specifically address the subject site but it does form the basis of the land uses and development controls recommended in PRCUTS.</p> <p>Importantly, the Report stated that any rezoning should be mindful of the displacement of existing businesses, particularly those who play a local service role and require a central location from which to service their key markets. The Report indicates that many inner and middle ring suburban locations were experiencing an incremental rezoning of light industrial lands to facilitate mixed use residential, thereby reducing the pool of potential alternate locations for local service businesses that are displaced. This is particularly relevant to this PP. The Report also highlighted the demand for industrial floor space across the PRC, whilst modest in comparison to other land use categories, is still important to support businesses that play a local service role. These businesses could include food manufacturers and</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>suppliers, smash repairers, alarm and security systems installers and technicians, construction businesses, etc. and in most cases require accessible locations proximate to their key markets and suppliers. Such premises could be provided on the site, which is essentially the existing use of the site under its current zoning.</p> <p>The Report recommended that 'destination commercial' premises (where visibility and exposure is not as critical) were suitable in the Taverners Hill Precinct given the poorly connected layout and disparate configuration of the precinct. Uses which require high exposure and visibility are unlikely to be attracted to this area. The Report explained that there are pockets of industrial properties within the precinct and although most are occupied, rents are modest, particularly those surrounded by residential uses.</p> <p>The report outlined that large gains in employment were primarily observed in health care & social assistance, accommodation & food services, construction, education & training and retail trade. This employment growth profile of the Corridor was considered a clear reflection of the response of industry to population growth. The report also noted that the health care & social assistance industry is highly represented in Taverners Hill (18.8%).</p> <p>The Report indicated that employment activity in Taverners Hill appeared to be focused around Marketplace where retail and other population based services are thriving. Growth in employment in retail trade, health care & social assistance, education & training were observed which were considered to be</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>consistent with the local service role that this precinct plays. Opportunities for retail facilities were considered more limited given the close proximity to larger existing retail facilities.</p> <p>Generally, the report emphasises on making Taverners Hill as a services precinct given its proximate location to other retail services and the movement of more heavy industry to Western Sydney. The Report also indicates that Taverners Hill would also be a logical location for a range of car showrooms, large format bulky and broad commercial office tenancies.</p> <p>This report underlines the previous discussion that the wider Taverners Hill precinct should focus on providing service uses.</p> <p>The PP is generally contrary to this Plan which emphasises that industrial land is still required and that the Taverners Hill Precinct can continue to accommodate destination commercial or in this case light industrial, uses.</p>
		Sydney CBD to Parramatta Strategic Transport Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This plan does not directly affect the subject site.
STRATEGIC MERIT TEST						
Q3	Does the proposal have strategic merit? Is it:					
	(a)	Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As outlined above, the Proposal fails to meet the Strategic Merit test as it is inconsistent with GSRP, ECDP and PRCUTS and therefore should not be supported.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments																			
			Y	N	N/A																				
		Consistent with relevant local council strategy that has been endorsed by the Department.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	At this stage, there are no relevant local strategies that have been endorsed by the Department and applicable to the site.																			
		Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Planning Proposal comes in advance of any infrastructure improvements including public transport improvements in the Parramatta Road corridor.</p> <p>PRCUTS identifies changing demographic trends for the corridor and provides future land use and built form controls to respond to these trends.</p> <p>The Proposal is inconsistent with the projected demographic trends in Parramatta Road Corridor Strategy for Taverners Hill Precinct. The Strategy forecasts that there would be 1,350 new dwellings and 4,110 jobs in the precinct by 2050. However, the largest increase in residential floor space is not proposed until the longer term in 2050 when it is expected to increase to 170,000m². The short term (to 2013) increase of 47,000m² in residential floor space does not include the subject site. The employment floor space is proposed to increase by the same amount, 35,000m², in both the short and long term periods as shown in Figure 15 below:</p> <p>Proposed Indicative Land Use Mix (additional)</p> <table><tr><th rowspan="2"></th><th colspan="2">RESIDENTIAL GFA (M²)</th><th colspan="2">EMPLOYMENT GFA (M²)</th></tr><tr><th>SHORT TERM (2023)</th><th>LONG TERM (2050)</th><th>SHORT TERM (2023)</th><th>LONG TERM (2050)</th></tr><tr><td>Precinct</td><td>47,000</td><td>170,000</td><td>35,000</td><td>35,000</td></tr><tr><td>Frame Area</td><td>0</td><td>0</td><td>0</td><td>315,000</td></tr></table> <p><i>Figure 2 - Extract from PRC Planning and Design Guidelines (p. 202)</i></p>		RESIDENTIAL GFA (M²)		EMPLOYMENT GFA (M²)		SHORT TERM (2023)	LONG TERM (2050)	SHORT TERM (2023)	LONG TERM (2050)	Precinct	47,000	170,000	35,000	35,000	Frame Area	0	0	0	315,000
	RESIDENTIAL GFA (M²)		EMPLOYMENT GFA (M²)																						
	SHORT TERM (2023)	LONG TERM (2050)	SHORT TERM (2023)	LONG TERM (2050)																					
Precinct	47,000	170,000	35,000	35,000																					
Frame Area	0	0	0	315,000																					

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						Review of the PRCUTS Growth Projections for the Precinct of 451 new dwellings by 2023 and 1350 by 2050 (see Section 5 of this report Part 3 Justification Q2 assessment) has demonstrated that this site does not need to be rezoned to meet these targets.
Q3	Does the proposal have site-specific merit, having regard to the following:					
	(b)	The natural environment (including known significant values, resources or hazards).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Flood Report notes that the site is impacted by flood storage along the western boundary in the 100 year ARI storm event. It is noted that this area also serves as a floodway through to Marion Street in the PMF event as water levels exceed the existing embankment levels of Lambert Park and overtop the embankment before continuing to flow downstream.</p> <p>Any proposed building footprint must be supported by additional flood modelling demonstrating no adverse impact to flood levels within Lords Road, against the railway embankment, and through Lambert Park during both the 100 year ARI and PMF events. Note that the proposal to provide compensatory flood storage (within tanks or otherwise) within the building footprint to offset any loss of natural flood storage area within the site is not supported. This will likely require amendment to the proposed building footprint within the southwest corner of the site where the flood depth is greatest.</p> <p>All floor levels (residential and commercial) must be raised above the Flood Planning Level. All access to the basement (vehicle and pedestrian) should be provided clear of the clear of the flood affected area, or raised sufficiently above the PMF level. In this regard, the proposed DCP locates the basement access towards the east of the site, which is supported.</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>The Flood Report recommends providing for vertical flood evacuation to higher levels within the building. Reliance on evacuation on site as the sole measure of evacuation protection as outlined in the PP is not considered appropriate. Such an evacuation route should be provided to the eastern side of Lords Road.</p> <p>As it is currently proposed, the PP is unacceptable in relation to flooding.</p>
		The existing uses, approved uses, and likely future uses of land in the vicinity of the proposal.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Proposal comes in advance of broader strategic planning work underway at local and state level including Local Housing Strategy and Employment Lands Review. These studies are significantly important to the making of an informed decision in relation to the future uses of the site and its rezoning. Until this work is complete the Proposal cannot demonstrate it has adequate site-specific merit to support its rezoning.</p> <p>It is also considered that the loss of 9,979m² of industrial floor space and the existing 160 jobs generated on the site under existing conditions is too great, given only token commercial uses which may generate around 96 to 128 jobs is proposed.</p>
		The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Planning Proposal would result in increased population density which will place pressure on existing services and infrastructure. The Proposal is out of alignment with the proposed infrastructure delivery schedule for the Parramatta Road corridor.</p> <p>The Proposal does offer to make financial agreements for infrastructure provision at local and state level within the IIDP but the contributions and scope of works offered</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>are too limited. Refer to the detailed comments under the Planning Proposal Report and Out of Sequence basement checklist in Attachment 2 (see Section 5 of this report Part 3 Justification Q2 assessment against PRCUTS Implementation Plan).</p> <p>It is clear however that none of the proposed new, enhanced or expanded infrastructure required by the PRCUTS Infrastructure Schedule has been provided nor would it be by this proposed development.</p> <p>Council is also preparing a new infrastructure Contributions Plan, which intends to build financial capacity for provision of additional infrastructure in the Corridor area to support the future population in the Inner West. Local infrastructure cannot be adequately levied for this type of spot rezoning along the PRCUTS corridor until IWC completes this new Developer Contribution Plan.</p> <p>In its absence, Council cannot make a fully informed decision regarding the funding required to resource the future growth and provide additional infrastructure. Consequently the Proposal should not be supported until this work is completed by Council.</p>
Q4	Is the planning proposal consistent with a council's strategy or other local strategic plan?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>There are a number of local strategies and local strategic plans which have been endorsed by Council and need to be considered including:-</p> <ul style="list-style-type: none"> • <i>Inner West Council Community Strategic Plan: Our Inner West 2036 (June 2018)</i> • <i>Integrated Transport Plan – Leichhardt</i> • <i>Leichhardt Economic and Employment</i>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<i>Development Plan;</i> <ul style="list-style-type: none"> <i>Inner West Council Affordable Housing Policy 2016</i> These are considered in detail below.
	Inner West Council Community Strategic Plan (CSP) <i>Our Inner West 2036 (June 2018)</i>					Overall as is clear from the assessment of the Proposal in the table below that it fails to adequately address or make a sufficient substantial contribution to the implementation of the direction and strategies of the CSP. The CSP is structured around the guiding principle of <i>"To work together in a way that is creative, caring and just"</i> .
	Strategic Direction 1: An ecologically sustainable inner west					
	1.1 The people and infrastructure of Inner West contribute positively to the environment and tackling climate change.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The PP does not sufficiently demonstrate that the proposal achieves the sustainability criteria of the PRCUTS which is considered further in the PRCUTS consideration in this checklist.
	<ul style="list-style-type: none"> <i>Develop planning controls to protect and support a sustainable environment.</i> 					
	1.2 Inner West has a diverse and increasing urban forest that supports connected habitats for flora and fauna.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The PP provides some additional landscaping opportunities within the site, however does not sufficiently demonstrate that the tree canopy will enhance biodiversity corridors or protect, conserve and enhance existing natural area sites for species richness and diversity. There are limited details regarding the proposed bushland regeneration to be undertaken within the GreenWay.
	<ul style="list-style-type: none"> <i>Support people to protect, restore, enhance and connect with nature in Inner West.</i> <i>Maintain and increase Inner West's tree canopy and urban forest, and enhance biodiversity corridors.</i> 					
	1.3 The community is water sensitive, with clean, swimmable waterways.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		This is not directly relevant to this PP.
	1.4 Inner West is a zero emissions community that generates and owns clean energy.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		This is not directly relevant to this PP.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		1.5 Inner West is a zero waste community with an active share economy.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP. Relevant conditions can be applied to future DAs.
Strategic Direction 2: Unique, liveable, networked neighbourhoods						
		2.1 Development is designed for sustainability and makes life better. <ul style="list-style-type: none"> <i>Pursue integrated planning and urban design across public and private spaces to suit community and environment needs.</i> <i>Improve the quality, and investigate better access and use of existing community assets.</i> <i>Develop planning controls that protect and support a sustainable environment and contribute to a zero emissions and zero waste community.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP does not achieve integrated planning and urban design across public and private spaces nor respond to the complex urban planning and transport issue of developing land out of sequence as outlined in the PRCUTS. The lack of detail in relation to the proposed linkages to Marion light rail stop and other pathways through the site results in the strategy of improving the quality of access and use of existing community assets not being attained. The PP also does not incorporate the sustainability practices required by the PRCUTS.
		2.2 The unique character and heritage of neighbourhoods is retained and enhanced. <ul style="list-style-type: none"> <i>Manage change with respect for place, community history and heritage.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP does not manage change with respect to heritage as outlined in this checklist.
		2.3 Public spaces are high-quality, welcoming and enjoyable places, seamlessly connected with their surroundings. <ul style="list-style-type: none"> <i>Ensure private spaces and developments contribute positively to their surrounding public space.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP does not provide adequate public open space on the site given the central location of this public open space on the site reduces the likelihood of the public using this space.
		2.4 Everyone has a roof over their head and a suitable place to call home. <ul style="list-style-type: none"> <i>Ensure the expansion of social, community and affordable housing, distributed across Inner West,</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP does not provide adequate affordable housing in accordance with Council's policy as outlined in this checklist.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		<i>facilitated through proactive policies.</i> <ul style="list-style-type: none"> <i>Encourage diversity of housing type, tenure and price in new developments.</i> 				
		2.5 Public transport is reliable, accessible, connected and enjoyable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP does not allow transport infrastructure that aligns to population growth given it is proposed out of sequence.
		2.6 People are walking, cycling and moving around Inner West with ease. <ul style="list-style-type: none"> <i>Deliver integrated networks and infrastructure for transport and active travel.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP does not sufficiently demonstrate or provide the relevant land tenure arrangements for the proposed linkages to the Marion light rail stop.
Strategic Direction 3: Creative communities and a strong economy						
		3.1 Creativity and culture are valued and celebrated. <ul style="list-style-type: none"> <i>Grow Inner West's reputation as a leading creative and cultural hub, celebrating and supporting diverse creative industries and the arts.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP removes industrial land from the Inner West which can, and currently is, being used for creative uses. The removal of this industrial land and creative space is contrary to the strategy of growing Inner West's reputation as a leading creative and cultural hub. While it is acknowledged that the PP is attempting to rehome Art Est on the site, this has not been sufficiently demonstrated.
		3.2 Inner West is the home of creative industries and services. <ul style="list-style-type: none"> <i>Encourage the establishment of new enterprises in Inner West.</i> <i>Facilitate the availability of affordable spaces for creative industries and services.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As outlined above, the PP removes industrial land from the inner west which can, and currently is, being used for creative uses. The removal of this industrial land and creative space is contrary to the strategy of encouraging the establishment of new enterprises in Inner West and facilitating the availability of affordable spaces for creative industries and services.
		3.3 The local economy is thriving. <ul style="list-style-type: none"> <i>Support business and industry to be socially and environmentally responsible.</i> <i>Strengthen economic viability and connections</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP is contrary to this outcome given the PP removes industrial land from the inner west thereby reducing and not strengthening economic viability and connections beyond Inner West. The PP does not promote the Inner West as a great place to live, work, visit and invest in.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		<i>beyond Inner West.</i> <ul style="list-style-type: none"> <i>Promote Inner West as a great place to live, work, visit and invest in.</i> 				
		3.4 Employment is diverse and accessible. <ul style="list-style-type: none"> <i>Support local job creation by protecting industrial and employment lands.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The PP is contrary to this outcome given the PP removes industrial land from the inner west thereby reducing and not supporting local job creation and does not protect industrial and employment lands. The PP also does not encourage social enterprises and businesses to grow local employment.
		3.5 Urban hubs and main streets are distinct and enjoyable places to shop, eat, socialise and be entertained.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not relevant to the PP as it is not located on a main street or within an urban hub.
Strategic Direction 4: Caring, happy, healthy communities						
		4.1 Everyone feels welcome and connected to the community.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
		4.2 The Aboriginal community is flourishing, and its culture and heritage continues to strengthen and enrich Inner West.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
		4.3 The community is healthy and people have a sense of wellbeing.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
		4.4 People have access to the services and facilities they need at all stages of life.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
Strategic Direction 5: Progressive local leadership						
		5.1 People are well informed and actively engaged in local decision making and problem solving.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The proponent has undertaken preliminary community consultation for this Planning Proposal to comply with the Out of Sequence Checklist criteria. Detailed community consultation would be undertaken by Council if the Planning Proposal proceeds to the Gateway Stage and received a positive Gateway Determination.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		5.2 Partnerships and collaboration are valued and recognised as vital for community leadership and making positive changes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not directly relevant to this PP.
		5.3 Government makes responsible decisions to manage finite resources in the best interest of current and future communities. <ul style="list-style-type: none"> <i>Undertake visionary, integrated, long term planning and decision making, reflective of community needs and aspirations.</i> 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal is out of sequence with respect to the PRCUTS Action Plan for the Taverners Hill Precinct and is inconsistent with the Out of Sequence Checklist criteria. Accordingly, the PP is considered to be inconsistent with this outcome and strategy given it lacks the required integrated and long term planning and decision making required by the PRCUTS.
		Leichhardt Community and Cultural Plan 2011 - 2021	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This Plan has been superseded by the <i>Our Inner West 2036 (June 2018)</i> Community Strategic Plan.
		Integrated Transport Plan - Leichhardt	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal comes in advance of traffic and transport studies underway to determine the cumulative traffic impacts that will arise from implementation of PRCUTS and other infrastructure and development projects. Although the Proposal may not result in significant detrimental impacts on adjacent intersections, there are concerns regarding the potential cumulative effects of PRCUTS. Support of this Planning Proposal ahead of precinct wide traffic modelling would set an adverse precedent in the area and would be inconsistent with the requirements of Out of Sequence Checklist in the PRCUTS.
		Leichhardt Economic and Employment Development Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
		Outcome 1 - Make Place Matter	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		Outcome 2 - Meet People's Needs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Report states that Council believes that this objective is important because greater convenience,

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						choice and diversity can benefit the wellbeing of the local community and the vitality of the local economy. The loss of industrial land as contemplated in this PP will result in the reduction of land available for population serving industries currently located on this site and similarly zoned industrial land.
		Outcome 3 - Embrace the New Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Although the Planning Proposal suggests it will provide 3,000m² of commercial floor space to offset the loss of the industrial site on balance this loss would undermine the EEDP objectives to:</p> <ul style="list-style-type: none"> • Support small businesses and start-ups (Strategy 3.1) • Support the growth of creative industries (Strategy 3.3).
		Outcome 4 - Protect and Leverage Economic Assets	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See below.
		<p>The Leichhardt EEDP complements the Leichhardt Industrial Lands Study 2014 by setting out a more detailed analytical methodology for the review of proposed rezoning of Employment Lands.</p> <p>In practical terms, this approach has three key steps:</p> <ol style="list-style-type: none"> 1. A coordinated approach to reviewing sites (and where possible a concurrent approach) to ensure an LGA wider perspective is maintained particularly in relation to the need for, and suitability of, the sites for various uses both today and in the future. 2. A consistent approach is achieved by reviewing the sites against the standard criteria. 3. Where sites are found to be surplus to requirements and proposed to be rezoned, their suitability against a range of alternative uses discussed in this Plan is considered. For example, their potential rezoning and use for creative industries, commercial office space or affordable housing. <p>Step 2 above refers to standard criteria for assessing the suitability of an employment site for rezoning. In detail, this Plan advocates the use of standardised criteria which have been designed to qualify the suitability of sites from a quantitative perspective (i.e. is there enough industrial land to meet current and forecast demand), a qualitative perspective (i.e. does the industrial land have the attributes required by potential tenants) and from the perspective of economic viability (i.e. are industrial uses viable on the land). This standard criteria is considered in detail above in the consideration of Planning Priority E12, Retaining and managing industrial and urban services land, under the Eastern City District Plan consideration of this Checklist.</p>				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		<p>The proponent acknowledges that there are currently a number of contradictory legislative measures and policies at State and local level regarding the approach to retain/ transition the industrial land including Leichhardt EEDP. The proponent gives precedence to PRCUTS and the associated s117 direction to make the case for rezoning from industrial to residential. The proponent also proposes 3,000sqm of commercial floor space that could create 97-128 jobs in community uses, light industrial and urban services, creative industries, health facilities, education uses, gymnasium, restaurant/cafes and local service business. The functionality of such land, however, is questionable and it is unlikely that any significant 'industrial activity' is likely to be carried out on the site given the inherent problems with noise, servicing and the like.</p> <p>It is agreed that the Planning Proposal has some merit for rezoning in the context of Section 117 Direction 7.3 'Parramatta Road Corridor Urban Transformation Strategy' and policy direction for PRCUTS. However, Council has reservations regarding loss of any industrial land in the Taverners Hill precinct as discussed in the previous sections. In addition, the proponent's justification based on provision of commercial space is inadequate as it does not fully address the foremost issue of loss of urban services land given the inherent incompatibility between such uses and residential development. In this respect therefore retention of industrial land is required for economic and employment purposes rather than the number of jobs.</p> <p>This Planning Proposal is inconsistent with Council's intention to retain all industrial lands in response to the projected shortfall of urban services and employment land and therefore, should not be supported. The PP is also inconsistent with Strategy 4.1 of this Plan which requires proposals to protect and enhance key employment lands.</p>				
		Outcome 5 - Make Business and Employment easier	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not relevant to the PP.
		Outcome 6 - Communicate and Connect with Partners	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not relevant to the PP.
		Outcome 7 - Tell the World	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This is not relevant to the PP.
		Inner West Council Affordable Housing Policy 2016	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Council's Affordable Housing Strategy (2016) outlines the evidence that indicates that there is clear justification for Council to actively seek to increase the supply of affordable housing through its planning instruments and policies. The amount of unearned land increment (land value uplift) created through the operation of Council's planning and approvals processes, some of which may reasonably be contributed to affordable housing as key infrastructure or a public purpose under a voluntary planning agreement or other legal mechanism, is also

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>acknowledged.</p> <p>This Policy principally focuses on strong interventions through the planning system and the direct creation of affordable housing on public land through development and management partnerships as these are virtually the only way to create affordable housing in most areas of Inner West Council area</p> <p>The Policy outlines that there are a number of reasons why affordable housing needs to be provided including that there are a large, disproportionate and growing number of local people in housing stress, the displacement of historical populations through ongoing gentrification and non-replacement of affordable housing lost and current and projected levels of unmet need for affordable housing including for very low, low and moderate income households together with other more vulnerable groups.</p> <p>Section 2.5.2 of this Policy requires the following:-</p> <ul style="list-style-type: none"> • 15% of the GFA of the development (as a Major Planning Agreement as it is for a rezoning with a development of >20 dwellings and a GFA of > 1,700m²); • Where the share of land value uplift is provided as apartments, Council will determine the size and number of bedrooms in accordance with its strategic priorities, and seek a mix of dwellings sizes and bedroom numbers. • Title to apartments will be transferred to Council

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>in perpetuity.</p> <p>The PP involves providing 35 apartments as affordable housing to be managed by a Community housing Provider (Bridge Housing) for 10 years.</p> <p>This represents 14.89% of the proposed apartments, with the PP stating that this equates to approximately 8% of total gross floor area. However, the composition of these proposed affordable apartments is unclear as the breakdown of the types of apartments is not provided (i.e. studio, 1, 2 or 3 bedroom apartments).</p> <p>Accordingly, the PP is inconsistent with this Policy given:</p> <ul style="list-style-type: none"> • it provides only 8% of total GFA as affordable housing and not the required 15% for this size and type of development ; • the composition of the proposed affordable apartments is not provided and may not provide a spread of affordable units across the studio, 1, 2 and 3 bedroom unit types; and • The title is not transferred to Council in perpetuity.
Q5	Is the planning proposal consistent with applicable State Environmental Planning Policies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	SEPP No 1 - Development Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable to the current PP.
	SEPP 55 - Remediation of Land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proponent has provided a Remedial Action Plan (RAP) prepared by Benviron Group dated October 2018 which followed an earlier preliminary investigation which noted that there were some areas of contamination including asbestos. This is not unexpected given the past

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>and current industrial use on the site.</p> <p>The RAP concludes that the site can be made suitable for the proposed residential use subject to the remediation being carried out as outlined in the plan. This includes following the "excavate and dispose" strategy given excavation for the basement is proposed on the site.</p> <p>There were numerous concerns with this RAP including the following:</p> <ul style="list-style-type: none"> This RAP refers to an earlier study which was prepared by Environmental Monitoring Services titled '<i>Detailed Site Investigation</i>' dated March 2006 (the DSI). The RAP states that this DSI undertook a sampling program in which 21 boreholes were carried out on the site and that two (2) were found to contain levels of Benzo(a)pyrene concentrations above the NSW EPA levels while another two (2) boreholes recorded fragments or loose bundles of Chrysotile asbestos. The RAP states that this DSI concluded that "...a RAP would be required to ensure the removal of the contamination was managed in accordance with the requirements of the NSW EPA". It is noted that this DSI was not provided with this RAP or PP and that the map provided in the RAP did not contain a location map for the boreholes upon which the RAP is based and which was prepared for the DSI (notwithstanding that there is a key on this map referencing the boreholes which are not included). Therefore the location of

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>the earlier documented contamination is not located for the purposes of this RAP. The RAP cannot be used as evidence demonstrating that the issue of potential land contamination on the site can be adequately remediated for the proposed use when there is no location plan of the earlier contamination.</p> <ul style="list-style-type: none"> The age of the data used from the DSI, being from 2006 and twelve years ago, is considered to be outdated and should not be used for assessment purposes. It is unknown whether thresholds have changed in that time or that any new uses have occurred on the subject site in the intervening time period which may have led to further contamination. Accordingly, it is considered that the issue of potential land contamination has not been adequately considered in this Planning Proposal.
	SEPP 64 - Advertising and Signage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable to the current PP.
	SEPP 65 - Design Quality of Residential Apartment Development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The proponent has provided a cursory assessment of the proposed design against the Apartment Design Guide (ADG) provisions.</p> <p>Overall, it is considered that while the PP attempts to address some of the design issues of the ADG, there is insufficient information and assessment of the ADG in this PP. This is particularly in relation to the public domain interface, communal and public open space, apartment size and layout, private open space & balconies, common circulation & spaces, storage and facades where there is insufficient information to assess these aspects of the Guide.</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>Furthermore, the PP does not consider the proposal against the design quality principles of SEPP 65 with only a few diagrams illustrating setbacks, solar access, cross ventilation, communal open space and deep soil zone (pages 23-25) and two references in the Urban Design Report referring to SEPP 65 and the ADG.</p> <p>From the information provided, it is also considered that the PP is contrary to the following controls of the ADG:</p> <ul style="list-style-type: none"> • <u>3B Orientation</u> and <u>4A Solar and daylight access</u> – Insufficient analysis of potential building envelopes with respect to potential overshadowing of adjoining properties as well as within the development. Availability of solar access available to the units is inadequately demonstrated. • <u>4S Mixed use</u> - It is unlikely that the non-residential uses which have been proposed, including employment uses, will be compatible with the residential development on the site. These impacts are likely to arise from noise, servicing and parking. There is insufficient information on layout and configuration of the non-residential uses to adequately consider if the commercial areas are appropriately configured. <p>The peer-review of the urban design aspects of the proposal considered that there were various concerns with the proposal having regard to the ADG and other related design issues, including:-</p> <ul style="list-style-type: none"> • Visual Privacy (3F) – a review of the building-to-building separation with regard to the buildings on

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>the site is required and amendments made to the design accordingly. Review Building 5 ground floor apartments for general amenity;</p> <ul style="list-style-type: none"> • Facades (4M) – greater attention to the articulation of the proposed buildings is required. The scale of the southern elevation of Building 3 is required to be broken down with recesses or by other architectural means given it is approximately 87 metres long. Building 2 also requires greater articulation to the western boundary and requires an additional upper level setback to reduce impact to the GreenWay. Further setbacks are to be introduced for the proposed building at the corner of Lords Road and Davies Lane, to mitigate the scale and to protect the existing mature trees along the Lords Road frontage. A ground level setback of between 3m and 7m to Davies Lane is recommended for Building 5 to accommodate a minimum 3m footpath and landscaping. It is also recommended that 'before' and 'after' photomontages of the proposal is prepared from key vantage points to assess the visual impact. • Communal open space (3D) – clarification as to whether there will be roof top gardens; • Solar and daylight access (4A) – A shadow study should be provided in a plan view format for further assessment, particularly of the open space in the central portion of the site; • Landscape design (4O) – It is recommended that the rows of trees at the Lords Road and Davies

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
					<p>Lane corner are retained by the proposal to provide screening of the new development.</p> <ul style="list-style-type: none"> Vehicle access (3H) - It is recommended that the traffic circulation strategy and review the minimum clear width required for the shared path (potential problem with servicing of non-residential spaces).
	SEPP 70 - Affordable Housing (Revised Schemes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>IWC LGA has recently been included in the SEPP 70 application area to secure affordable housing. To apply IWC's Affordable Housing Policy under SEPP 70 Council will need to prepare an affordable housing contribution scheme to support each new Planning Proposal where contributions for affordable housing are required. This work has not started.</p> <p>While the PP includes a commitment to affordable housing under the proposed VPA, such affordable housing is inconsistent with Council's Affordable Housing Policy. Support of this PP in the absence of Council's broader strategic planning work and with a commitment in the proposed VPA being inconsistent with Council's Policy, would compromise Council's ability to exercise integrated planning for affordable housing.</p>
	SEPP 71 - Coastal Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not affected by this Plan.
	SEPP (Affordable Rental Housing) 2009	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP.
	SEPP (Building Sustainability Index - BASIX) 2004	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP.
	SEPP (Exempt and Complying Development Codes) 2008	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP.

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
	SEPP (Housing for Seniors or People with a Disability) 2004	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable to the current PP.
	SEPP (Infrastructure) 2007	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP. Should the Planning Proposal proceed, future development must comply with the requirements of this SEPP.in particular, the acoustic provisions being located adjoin the light rail will be required to be considered by any future development application. The Acoustic report submitted with the proposal also addresses this aspect of the proposal.
	SEPP (State and Regional Development) 2011	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (State Significant Precincts) 2005	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Sydney Drinking Water Catchment) 2011	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Sydney Region Growth Centres) 2006	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Three Ports) 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Urban Renewal) 2010	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Western Sydney Employment Area) 2010	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	Sydney (Western Sydney Parklands) 2009	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	Sydney REP No 26 - City West	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Educational Establishments and Childcare facilities) 2017	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	SEPP (Vegetation in Non-Rural Areas) 2017	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP.
	Draft SEPP (Competition) 2010	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	Draft SEPP (Infrastructure) Amendment (Review) 2016	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

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			Y	N	N/A	
		Draft Environment SEPP 2017	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP.
Q6	Is the planning proposal consistent with applicable Ministerial Directions (s. 117 Directions)?					
	Employment and Resources					
1.1	Business and Industrial Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See below	
	<p>Objectives:</p> <p>The objectives of this direction are to:</p> <ul style="list-style-type: none"> a) Encourage employment growth in suitable locations; b) Protect employment land in business and industrial zones; and c) Support the viability of identified centres. <p>Clause (4) of Direction 1.1 includes what a relevant planning authority must do if this direction applies.</p> <p>What a relevant planning authority must do if this direction applies?</p> <p>(4) A planning proposal must:</p> <ul style="list-style-type: none"> a) Give effect to the objectives of this Direction; b) Retain the areas and locations of existing businesses and industrial zones; c) Not reduce the total potential floor space area for industrial uses in industrial zones; and d) Ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment. <p>Clause (5) of Direction 1.1 outlines when a planning proposal may be inconsistent with the terms of this directions as follows:</p> <p>Consistency</p> <p>(5) A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Secretary of the Department of Planning and Environment (or an officer of the Department nominated by the Secretary) that the provisions of the planning proposal that are inconsistent are:</p> <ul style="list-style-type: none"> a) justified by a strategy which: <ul style="list-style-type: none"> i. gives consideration to the objective of this direction, and ii. identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and 					

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		<p>iii. is approved by the Secretary of the Department of Planning and Environment, or</p> <p>b) justified by a study (prepared in support of the planning proposal) which gives consideration to the objective of this direction, or</p> <p>c) in accordance with the relevant Regional Strategy, Regional Plan or Sub - Regional Strategy prepared by the Department of Planning and Environment which gives consideration to the objective of this direction, or</p> <p>d) of minor significance</p> <p><u>Officer's response:</u></p> <p>This s9.1 Ministerial Direction (formerly 117 directions) does not align with the s9.1 Direction 7.3 for implementation of the Parramatta Road Corridor Urban Transformation Strategy which recommends rezoning of the site from industrial to residential.</p> <p>The proponent claims that implementation of PRCUTS takes precedence over the other instruments and strategies as it was informed by relatively recent detailed analysis and stakeholder engagement. Interestingly, this Direction was issued (or updated) on 1 May 2017, after the issue of Direction 7.3 for the implementation of the PRCUTS on 9 December 2016.</p> <p>Former Leichhardt Council's policies strongly oppose loss of existing industrial land in response to demand for such land and its critical function in supporting a growing local population and economy. A recently (2018) completed independent peer review of an economic impact assessment supporting a planning proposal to rezone an industrial site in Leichhardt again confirmed that there is currently high demand for, and a shortfall of, available industrial land in the South Sydney and North Shore industrial market areas (Inner West is in the South Sydney industrial submarket). This is reflected in current high rents and market prices.</p> <p>In the context of this critical shortfall of employment land at the sub regional level, also acknowledged in the GSRP and ECDP and is relevant to the s9.1 Direction to protect employment land in business and industrial zones. It is, therefore, recommended that the Planning Proposal should not be supported.</p>				
	1.2	Rural zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	1.3	Mining, Petroleum Production and Extractive Industries	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	1.4	Oyster Aquaculture	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	1.5	Rural Lands	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	Environment and Heritage					N/A
	2.1	Environment Protection Zones	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	2.2	Coastal Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

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			Y	N	N/A	
	2.3	Heritage Conservation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance. While the site is located adjoining a heritage item, the potential impact on this item is considered elsewhere and it is considered that this direction relates to heritage items only.
	2.4	Recreation Vehicle Areas	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	2.5	Application of E2 and E3 zones and Environmental Overlays in Far North Coast LEPs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Housing Infrastructure and Urban Development						
	3.1	Residential Zones	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal is consistent with this Direction as it would provide additional housing opportunities in an area located close to jobs and existing services.
	3.2	Caravan Parks and Manufactured Home Estates	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	3.3	Home Occupations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Proposal does not contravene this direction.
	3.4	Integrating Land Use and Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Proposal does not contravene this direction.
	3.5	Development Near Licensed Aerodromes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is located beyond the ANEF 20 contour and accordingly is not affected by aircraft noise.
	3.6	Shooting Ranges	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Hazard and Risk						
	4.1	Acid Sulphate Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The subject site is located on Class 5 Acid Sulfate soils land and is located in close proximity to Class 3 land being the Hawthorne Canal. The Planning Proposal is supported by a Remediation Action Plan which concludes that the site can be made suitable for residential purposes. However, this Plan does not address acid sulphate soils.</p> <p>If the Planning Proposal proceeds past the gateway</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						and/or to the Development Application Stage, the proposal will be required to provide a detailed Remediation and Management plan to ensure that there are no significant environmental impacts from the reuse of this land.
	4.2	Mine Subsidence and Unstable Land	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	4.3	Flood Prone Land	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The objectives of this direction include ensuring that development of flood prone land is consistent with the NSW Government's <i>Flood Prone Land Policy</i> and the principles of the <i>Floodplain Development Manual 2005</i>. The other objective is to ensure that the provisions of an LEP on flood prone land is commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land.</p> <p>This Direction requires that a planning proposal must not impose flood related development controls above the residential flood planning level for residential development on flood prone land must include provisions that give effect to and are consistent with the <i>NSW Flood Prone Land Policy</i> and the principles of the Floodplain Development Manual 2005 (including the Guideline on Development Controls on Low Flood Risk Areas).</p> <p>The subject site is affected by the 1 in 100 year flood level, with the Flood Report provided with the PP noting that the site is impacted by flood storage along the western boundary in the 100 year ARI storm event. It is noted that this area also serves as a floodway through to Marion Street in the PMF event as water levels exceed the existing embankment levels of Lambert Park and overtop the embankment before continuing to flow downstream.</p>

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			Y	N	N/A	
						The PP is generally consistent with this Direction in that it does not propose any controls which are contrary to these flood management documents and policies. Furthermore, the PP does not propose any provisions which would be contrary or in conflict with Cause 6.3 of the LLEP 2013 in relation to Flood planning.
	4.4	Planning for Bushfire Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not bushfire prone land.
	Regional Planning					
	5.1	Implementation of Regional Strategies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	5.2	Sydney Drinking Water Catchments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	5.3	Farmland of State and Regional Significance on the NSW Far North Coast	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	5.4	Commercial and Retail Development along the Pacific Highway, north Coast	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	5.8	Second Sydney Airport: Badgerys Creek	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	5.9	North West Rail Link Corridor Strategy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	5.10	Implementation of Regional Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	Local Plan Making					
	6.1	Approval and Referral Requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	6.2	Reserving Land for Public Purposes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	6.3	Site Specific Provisions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The objective of this direction is to discourage unnecessarily restrictive site specific planning controls. This direction applies when a relevant planning authority prepares a planning proposal that will allow a particular development to be carried out.

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			Y	N	N/A	
						<p>If this direction applies and a planning proposal that will amend another environmental planning instrument in order to allow a particular development proposal to be carried out must, the relevant planning authority must either:</p> <ul style="list-style-type: none"> a) allow that land use to be carried out in the zone the land is situated on, or b) rezone the site to an existing zone already applying in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended. <p>In relation to (a) and (c), it is considered inappropriate to allow residential flat development and commercial premises in a light industrial zone (IN2) and accordingly, this option is not suitable for the current proposal.</p> <p>In this case, the PP involves a rezoning of the site to R3 Medium Density Residential which is an existing zone within the LLEP 2013. The PP also seeks to impose revised development standards in that the height and FSR development standards will require amendments. This can be achieved by amending Clauses 4.3(2) and 4.4(2) of the LLEP 2013 respectively. These are not site-specific clauses given these clauses already exist within the LLEP 2013. Updated mapping is required which</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>would be undertaken under this proposal.</p> <p>There are some of the proposed provisions within Part 2 of the PP (Explanation of Provisions) which are considered to be site-specific which include the following:</p> <ol style="list-style-type: none"> <i>The objective of this clause is to facilitate the provision of at least 3,000m² of non-residential uses at 67-75 Lords Road to ensure the ongoing employment and urban services function of the site;</i> <i>This clause applies to 67-75 Lords Road being Lot 1 DP 940543 and Lot 1 DP 550608.</i> <i>A minimum of 3,000m² of non-residential uses must be provided on the land to which this clause applies.</i> <i>Despite any other provision of this plan development consent may be granted for the following uses: recreation facility (indoor), office premises, business premises, light industry, industrial retail outlet, and restaurant and café.</i> <i>Despite any other provision of this plan development consent may be granted for an FSR greater than 2.4:1, but only if the increase is provided as a public benefit in the form of a 500m² multi-use facility to be used in conjunction with Lambert Park.</i> <i>Development consent must not be granted for development on the site unless a site specific DCP has been endorsed by the planning proposal authority.</i> <p>In particular, items (3), (4) and (5) impose requirements in addition to those already contained in that zone in that these requirements are not standard requirements in the</p>

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
						<p>R3 zone. However, it is considered that such clauses are similar to adopted clauses 6.15, 6.17, 6.18, 6.19 and 6.20 of the LLEP 2013.</p> <p>While these proposed provisions do not strictly comply with Clause 4 of this Direction, they are considered to be of minor significance given they will provide floor space for non-residential and community uses. Therefore, the PP satisfies Clause 6 of this Direction which allows a PP to vary these requirements of this Direction if such variations are of minor significance. It is considered that this criteria has been satisfied in this instance.</p> <p>The PP is generally consistent with this Direction.</p>
	Metropolitan Planning					
	7.1	Implementation of a Plan for Growing Sydney	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A Plan for Growing Sydney has been superseded by the <i>Greater Sydney Region Plan 2018</i> . As discussed previously, the Planning Proposal is inconsistent with the Region Plan and therefore with this Direction 7.1 (refer to the discussion outlined above).
	7.2	Implementation of Greater Macarthur Land Release Investigation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	7.3	Parramatta Road Corridor Urban Transformation Strategy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See below. The PP is subject to the provisions of the PRCUTS and accordingly, this Direction is a relevant consideration.
		Objectives (1) <i>The objectives of this Direction are to:</i> <ul style="list-style-type: none"> a) <i>facilitate development within the Parramatta Road Corridor that is consistent with the Parramatta Road Corridor Urban Transformation Strategy (November, 2016) and the Parramatta Road Corridor Implementation Tool Kit,</i> b) <i>provide a diversity of jobs and housing to meet the needs of a broad cross - section of the community, and</i> c) <i>guide the incremental transformation of the Parramatta Road Corridor in line with the delivery of necessary infrastructure.</i> 				

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist		Satisfactory			Comments
		Y	N	N/A	
		<p>Clause (4) of Direction includes what a relevant planning authority must do if this direction applies.</p> <p><i>(4) A planning proposal that applies to land within the Parramatta Road Corridor must:</i></p> <ul style="list-style-type: none"> <i>a) give effect to the objectives of this Direction,</i> <i>b) be consistent with the Strategic Actions within the Parramatta Road Corridor Urban Transformation Strategy (November, 2016),</i> <i>c) be consistent with the Parramatta Road Corridor Planning and Design Guidelines (November, 2016) and particularly the requirements set out in Section 3 Corridor-wide Guidelines and the relevant Precinct Guidelines,</i> <i>d) be consistent with the staging and other identified thresholds for land use change identified in the Parramatta Road Corridor Implementation Plan 2016 – 2023 (November, 2016),</i> <i>e) contain a requirement that development is not permitted until land is adequately serviced (or arrangements satisfactory to the relevant planning authority, or other appropriate authority, have been made to service it) consistent with the Parramatta Road Corridor Implementation Plan 2016 – 2023 (November, 2016)</i> <i>f) be consistent with the relevant District Plan.</i> <p>Clause (5) of Direction outlines when a planning proposal may be inconsistent with the terms of this directions as follows:</p> <p>Consistency</p> <p><i>(5) A planning proposal may be inconsistent with the terms of this Direction only if the relevant planning authority can satisfy the Secretary of the Department of Planning & Environment (or an officer of the Department nominated by the Secretary) that the planning proposal is:</i></p> <ul style="list-style-type: none"> <i>a) consistent with the Out of Sequence Checklist in the Parramatta Road Corridor Implementation Plan 2016 – 2023 (November, 2016), or</i> <i>b) justified by a study (prepared in support of the planning proposal) that clearly demonstrates better outcomes are delivered than identified in the Parramatta Road Corridor Urban Transformation Strategy (November, 2016) and Parramatta Road Corridor Implementation Plan 2016-2023 (November, 2016)having regard to the vision and objectives, or</i> <i>c) of minor significance.</i> <p><u>Officer's comment:</u></p> <p>A detailed assessment of the Planning Proposal against the PRCUTS has been provided previously in this table under Question 3.</p> <p>The Proposal is inconsistent with the following objectives of this direction:</p> <ul style="list-style-type: none"> <i>a) facilitate development within the Parramatta Road Corridor that is consistent with the Parramatta Road Corridor Urban Transformation Strategy (November, 2016) and the Parramatta Road Corridor Implementation Tool Kit,</i> <i>b) provide a diversity of jobs and housing to meet the needs of a broad cross - section of the community, and</i> 			

3. Department of Planning and Environment's Guide to Preparing Planning Proposals Information Checklist			Satisfactory			Comments
			Y	N	N/A	
		<p>c) <i>guide the incremental transformation of the Parramatta Road Corridor in line with the delivery of necessary infrastructure.</i></p> <p>As outlined in the discussion in relation to Question 3, the PP does not adequately meet the following requirements of Clause 4:</p> <ul style="list-style-type: none"> a) <i>give effect to the objectives of this Direction,</i> b) <i>be consistent with the Strategic Actions within the Parramatta Road Corridor Urban Transformation Strategy (November, 2016),</i> c) <i>be consistent with the Parramatta Road Corridor Planning and Design Guidelines (November, 2016) and particularly the requirements set out in Section 3 Corridor-wide Guidelines and the relevant Precinct Guidelines,</i> d) <i>be consistent with the staging and other identified thresholds for land use change identified in the Parramatta Road Corridor Implementation Plan 2016 – 2023 (November, 2016),</i> e) <i>contain a requirement that development is not permitted until land is adequately serviced (or arrangements satisfactory to the relevant planning authority, or other appropriate authority, have been made to service it) consistent with the Parramatta Road Corridor Implementation Plan 2016 – 2023 (November, 2016)</i> f) <i>be consistent with the relevant District Plan.</i> <p>The Proposal also fails to meet the merit tests of the Out of Sequence Checklist in the Parramatta Road Corridor Implementation Plan 2016 – 2023 to support its rezoning ahead of the staging plan (discussed in detail in Attachment 2). There are also concerns regarding the proposed design and layout of the proposal which is inconsistent with the recommendations of the PRCUTS Planning and Design Guidelines and would potentially result in an adverse precedent for the surrounding area in terms of built form, setbacks and transitions.</p> <p>The proponent has prepared this Planning Proposal in response to the PRCUTS, but it fails to satisfactorily meet all the requirements of the Strategy. In particular, it is noted that PRCUTS requires a substantial contribution towards the Strategy's wider vision for proposals outside the 2016 - 2023 Implementation area yet the Council considers that the IIDP is unsatisfactory.</p> <p>The most appropriate way to review the development controls for the site is considered to be at the IWC comprehensive LEP/ DCP stage. Work on this has begun. This will also align with the staging sequence recommended in the PRCUTS Implementation Plan.</p> <p>The Planning Proposal is inconsistent with this direction and therefore should not be supported.</p>				
	7.4	Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	7.5	Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

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		Y	N	N/A	
Q7	Is there any likelihood that critical habitat or threatened species, populations or ecological communities or their habitats will be adversely affected as a result of the proposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>There are no critical known habitat, threatened species, populations or ecological communities or their habitats on the subject site.</p> <p>There are several trees along the eastern and southern boundaries of the site which contribute to the leafy character of the street. The GreenWay is located adjacent to the western boundary which includes large areas of vegetation, which contribute to the green corridor.</p> <p>The proponent's concept design provides a 6m setback on the ground level to the GreenWay boundary. Greater setbacks are required to provide the green corridor along the GreenWay and enhance the environmental value of this area. There are also some trees proposed to be removed at the Lords Road and Davies Lane corner of the site which should be retained. These issues are considered below.</p>
Q8	Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?				
	Urban Design, Built form & Apartment Design Guide	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Planning Proposal has been assessed against the requirements of SEPP 65 and Apartment Design Guide.
	Existing site plan (buildings vegetation, roads, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The urban design report submitted with the Planning Proposal provides sufficient information relating to the existing site plan and surrounding development.
	Building mass/block diagram study (changes in building height and FSR)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report.
	Overshadowing impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report.
	Development yield analysis (potential yield of lots,	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report. This is considered in the social impact

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			Y	N	N/A	
		houses, employment generation)				consideration.
		Traffic and Transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>See report.</p> <p>In general, prior to any rezoning commencing, the PRCUTS Implementation Plan requires the completion of a precinct-wide traffic study and supporting modelling which considers the recommended land uses and densities, as well as future Westconnex conditions, and identifies the necessary road improvements and upgrades required to be delivered as part of any proposed renewal in the Precinct.</p> <p>The above mentioned study is being undertaken in collaboration with the Department of Planning and Environment (DPE) and its completion is not anticipated until the end of March 2019. It is unlikely that a planning proposal could be supported prior to the completion of this study.</p> <p>There are concerns regarding the potential area-wide implications of a cumulative rezoning/ up zoning of sites in the Parramatta Corridor in the absence of adequate public transport infrastructure improvements.</p> <p>In addition to these greater strategic considerations, the proposal also presents numerous traffic and access concerns, including in Davies Lane, the provision of car share facility being provided off-site and the proposed vehicle access point into the site being located in close proximity to the 90 degree road bend in Lords Road. The potential for pedestrian conflicts given the narrowness of Davies Lane may require the provision of a 1.5m wide footpath along the length of Davies Lane. Further concerns include the potential for additional right turn movements at the Foster/Tebbutt Street/Kegworth Street</p>

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		Y	N	N/A	
					<p>intersection, particularly during school peak period and numerous concerns with the Traffic Report as outlined in the Assessment Report.</p> <p>While the active transport link through Lambert Park is discussed, there is no formal commitment to this from either party. This connection is unlikely to be achieved unless Lambert Park is reconfigured.</p> <p>Given these inherent traffic and transport concerns and the lack of the precinct-wide traffic study and supporting modelling for the Precinct, it is considered that the PP is unacceptable in its current form and timing and therefore cannot be supported.</p>
	Public Domain	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Public domain improvements should be considered as outlined in the Planning Proposal report.
	Heritage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The subject site is not a heritage item nor located in a heritage conservation area. However, it is located next to a heritage item located within Lambert Park and in close proximity to the listed Kegworth Primary School. Heritage Conservation Area is located to the west of the site beyond the Hawthorne Canal.</p> <p>The PP does not adequately demonstrate that there will be no adverse impacts on the heritage value of the adjoining and nearby heritage items.</p>
	Bushfire hazard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
	Acid Sulphate Soil	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See report
	Noise impact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See report
	Landscape	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report
	Soil stability, erosion, sediment, landslip assessment, and	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Can be considered in detail in future development

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		Y	N	N/A	
	subsidence				applications.
	Water quality	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A stormwater plan has been provided. It is considered that this issue can be considered at the detailed design/DA stage.
	Stormwater management and Flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report. There are several concerns with the flooding and stormwater aspects of the proposal.
	Land/site contamination (SEPP55)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See report
	Resources (including drinking water, minerals, oysters, agricultural lands, fisheries, mining) Sea level rise	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Q9	Has the planning proposal adequately addressed any social and economic effects?				
	Social Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report. In general, the PP does not demonstrate that the negative social and economic impacts are outweighed or addressed through positive impacts and is not supported on the social impact grounds. This outcome is not in the spirit of the Inner West vision of working together in a way that is creative, caring and just as required by the Council's Community Strategic Plan Our Inner West 2036.
	Economic Considerations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Economic Impact Assessment (EIA)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The EIA Is not supported given the numerous concerns with this analysis which are considered in the final Planning Proposal report.
	Employment land	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report
Q10	Is there adequate public infrastructure for the planning proposal?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report

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		Y	N	N/A	
Q11	What are the views of State and Commonwealth public authorities consulted in accordance with Gateway Determination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See report
Part 4 - Mapping (including current and proposed zones/changes etc.)		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See report
Part 5 - Recommended community consultation (including agencies to be consulted)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See report
Part 6 - Project timeline (anticipated timeframes)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See report