# Planning Proposal

## 1 - 5 Chester Street, Annandale

## March 2020

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# Table of Contents


Executive Summary ..... 2
Background ..... 3
Site Context ..... 6
Site Description ..... 6
Current Planning Controls ..... 9
Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) ..... 11
Part 1 – Objectives or intended outcomes ..... 15
Part 2 – Explanation of the provisions ..... 16
Part 3 – Justification ..... 18
Height and Built form ..... 18
Conservation area transition ..... 20
Section A – Need for the planning proposal ..... 22
Section B – Relationship to strategic planning framework ..... 22
1. Greater Sydney Region Plan 2018 ..... 22
2. Eastern City District Plan 2018 ..... 24
3. Camperdown-Ultimo Collaboration Area Place Strategy ..... 26
4. Parramatta Road Corridor Urban Transformation Strategy ..... 28
Strategic Merit Test Assessment Criteria ..... 44
Consistency with State Environmental Planning Policies ..... 53
Consistency with Ministerial Directions ..... 55
Section C – Environmental, social and economic impact ..... 64
Part 4 – Mapping ..... 74
Part 5 – Community consultation ..... 74
Part 6 – Project timeline ..... 74

## Executive Summary

This planning proposal explains the intent of and justification for proposed amendments to *Leichhardt Local Environmental Plan* (LLEP) 2013 as it applies to 1 - 5 Chester Street, Annandale. It follows a request from the future landowner Britely Property to redevelop the site for mixed-used (employment and student housing), increase the floor space ratio of the site to 2:1 and introduce a maximum permissible height of 17m or 5 storeys. The proposed amendments would facilitate a mixed use development with a minimum of 980sqm of non-residential floorspace associated with employment/ high technology industrial uses on the ground and first floor, and student housing on the upper floor levels to support local health and educational institutions.

The planning proposal is accompanied by an amendment to *Leichhardt Development Control Plan 2013* (LDCP) 2013 which provides detailed planning guidelines for redevelopment of the site.

This planning proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* (the Act) and the Department of Planning, Industry and Environment's documents '*A guide to preparing planning proposals*' and *'A guide to preparing local environmental plans'*.

## Background

AE Design Partnership on behalf of Britely Property submitted the original planning proposal in February 2018 which sought to rezone the site from Light Industrial (IN2) to Medium Density Residential (R3) in line with the recommendations of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS), increase the Floor Space Ratio (FSR) to 2.6:1 and introduce a new height building height control of 17m to facilitate a part 5 storey and part 6 storey residential development.

On 30 October 2018, Council resolved (Resolution C1018(2) Item 10) to not support this original planning proposal following Inner West Local Planning Panel's (IWLPP) recommendation as:

*a) 'It fails the Strategic Merit Test of "A guide to preparing planning proposals" as it is inconsistent with key objectives and priorities of the Greater Sydney Region Plan 2018; Eastern City District Plan 2018; and Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) 2016. Specifically, the planning proposal is inconsistent with the following elements of PRCUTS:*

*i. Policy context and the Strategy's vision for the Corridor and especially for the Camperdown precinct which is for residential development including affordable, student and key workers accommodation to support biotechnology and employment uses;*

*ii. Implementation Tool Kit including the Implementation Plan 2016-2023, Planning and Design Guidelines, Infrastructure Schedule and Urban Amenity Improvement Plan;*

*iii. Reference Reports including the Precinct Transport Report, Fine Grain Study and Sustainability Implementation Plan;*

*iv. Exceeds the Planning and Design Guidelines recommended density by 73.3% without satisfactorily demonstrating that the proposal would achieve better built form outcomes or design excellence; and*

*v. Does not meet the requirements of the Parramatta Road Implementation Plan 2016 - 2023 'Out of Sequence Checklist' criteria.*

*b) It is inconsistent with the Ministerial Directions issued under Section 9.1 of the Environmental Planning and Assessment Act 1979 including Directions No. 1.1 - Business and Industrial Zones, 7.1 - Implementation of A Plan for Growing Sydney and 7.3 - Parramatta Road Corridor Urban Transformation Strategy;*

*c) It is inconsistent with the Inner West Council Community Strategic Plan 2018;*

*d) It is inconsistent with Leichhardt Employment and Economic Development Plan 2013 - 2023, Leichhardt Employment Lands Study 2014 and Leichhardt Industrial Precinct Planning Report 2016 and would result in loss of employment and urban services land;*

*e) It is premature in the light of the prospective outcomes of strategic planning studies and projects underway at State and Local Government levels;*

*f) It does not demonstrate that it will make an adequate contribution towards the provision of affordable housing which is inconsistent with the objectives of the Greater Sydney Region Plan 2018, Eastern City District Plan 2018 and Council's Affordable Housing Policy; and*

*g) Support of this planning proposal would result in a premature and adverse development precedent in the Camperdown Precinct and for other sites in the Parramatta Road Corridor Strategy area.'*

On 3 May 2019, File Planning Development on behalf of Britely Property submitted an amended planning proposal to address Council's concerns. This proposal sought to retain the IN2 Light Industrial Zoning on the site and introduce boarding house as an additional use to facilitate student housing, increase the overall FSR to 2.75:1 with a minimum of 0.75:1 for non-residential uses and introduce a maximum height control of 17m for a six-storey mixed-use development.

On 23 July 2019, the IWLPP in its advice to Council recommended (IWLPP740/19 Agenda Item 2) that the amended planning proposal should not be supported as:

a) *'It fails the strategic and the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) Out of Sequence Checklist tests;*

b) *It is inconsistent with the Ministerial Direction issued under Section 9.1 of the Environmental Planning and Assessment Act 1979 Direction 7.3 - Parramatta Road Corridor Urban Transformation Strategy; and*

c) *It is premature in the light of the prospective outcomes of current State and local government strategic planning studies and projects including the Inner West Local Strategic Planning Statement/ Local Environmental Plan/ Development Control Plan/Contributions Plan and PRCUTS precinct-wide traffic study.'*

Notwithstanding, the Panel agreed with Council officers' recommendation that potentially the site has strategic merit for redevelopment and supported the following principles for a further revision to the planning proposal:

- *'Rezone the site to B7 Business Park and allow boarding house as an additional permitted use;*

- *Increase the FSR of the site up to 2:1 with a minimum non-residential floor space of 980sqm (or FSR 0.75:1) dedicated to business and office premises and light industries in the technology, bio-medical, arts, production and design sectors. Refer to the alternate scheme developed by Architectus;*

- *Establish a 17m height limit which would facilitate a five-storey development on the site with minimum floor to ceiling heights for employment uses to be incorporated in the DCP;*

- *Ensure that the proposed boarding house will not have an adverse impact on the surrounding industrial uses and that the development will include the necessary design and acoustic measures to ensure that there are no significant adverse impacts on the amenity of future residents of the site;*

- *Ensure that a minimum percentage of non-residential floor space is made available as affordable space for tech start-ups, innovative creative industries, community uses and artists to align with the objectives of Camperdown Ultimo Collaboration area Place Strategy;*

- *Incorporate appropriate mechanisms to ensure that 'new gen' boarding house rents are affordable in perpetuity;*

- *Ensure that the development provides a pedestrian and cycle access through the site along Johnstons Creek to align with the objectives of the Parramatta Road Corridor Urban Amenity Improvement Plan and Camperdown Public Domain Masterplan;*

- *Ensure that the development will incorporate environmentally sustainable design principles which exceed the PRCUTS sustainability targets;*

- *Update the site - specific DCP to reflect Architectus's urban design recommendations and in particular, the re-orientation of the building form to front Chester Street and the southern boundary of the site and create open space facing Johnstons Creek;*

- *Update the proposal in response to the outcomes of the precinct-wide traffic study once completed;*

- *Update the IIDP and ensure that satisfactory arrangements are made for the provision of State and local infrastructure;*

- *Consider DCP requirements to provide infrastructure or the capacity for EV charging points, including appropriate charging outlets in each parking space*

- *Future-proof the development by incorporating for recycled water use; and*

- *Update the Out of Sequence Checklist assessment to reflect achievement of the above objectives.'*

In December 2019, the proponent submitted the revised proposal based on the above principles.

Council has amended this proposal further to align with the Panel's previous recommendations, Council's wider strategic planning policies including the Inner West Local Strategic Planning Statement (LSPS), Housing Strategy and Draft Employment and Retail Lands Strategy (EaRLS), Parramatta Road Corridor Urban Transformation Strategy and Camperdown-Ultimo Collaboration Area Place Strategy (C-U CAPS).

# Site Context

## Site Description

The site is a triangular shaped 1,307 sqm lot in the Leichhardt Development Control Plan designated Camperdown precinct (Figure 1). The site is located at the end of the Chester Street cul-de-sac, approximately 300m from Parramatta Road and 3.5 km from the Sydney CBD (Figure 2).

The site has a 44m frontage to Chester Street and 55m frontage to Johnstons Creek.

The site slopes down by approximately 1m from the southern boundary to the northern and eastern boundaries.

*Figure 1 - Location of site (shown in blue) in the context of PRCUTS Camperdown precinct (shown in red).*

*Figure 2  Aerial view of the site (shown in red) looking towards the CBD.*

*Figure 3 - Extract from the zoning map of LLEP 2013. Subject site shown in red.*

The site currently accommodates a part by one and part by two storey industrial building, which provides car repair services (Refer to Figure 4). The northern boundary of the site adjoins Johnstons Creek. There are one and two storey single residential terrace dwellings to the north and east of the site and two or three storey industrial warehouse buildings to the south and west.

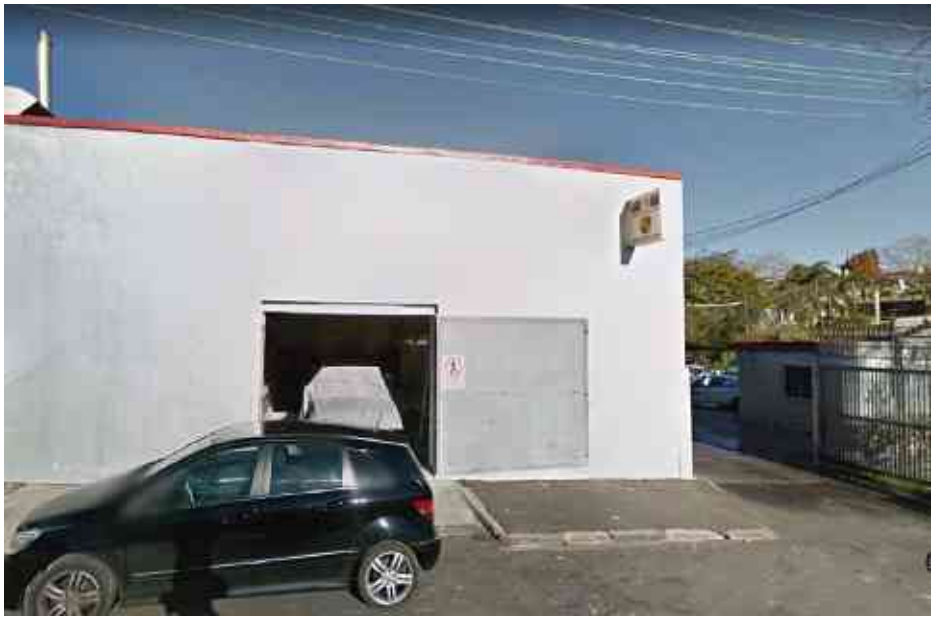

*Figure 4 - Existing warehouse when viewed from Chester Street.*

*Figure 5 - Subject site when viewed from Douglas Grant Memorial Park.*

*Figure 6 - Surrounding residential buildings to the north of Johnstons Creek.*

*Figure 7 - Kennards Storage Warehouse at 1 - 19 Booth Street opposite the subject site*

## Current Planning Controls

The site is in an IN2 Light Industrial zone under LLEP 2013 which states the following objectives for the zone:

- *To provide a wide range of light industrial, warehouse and related land uses.*
- *To encourage employment opportunities and to support the viability of centres.*
- *To minimise any adverse effect of industry on other land uses.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.*
- *To support and protect industrial land for industrial uses.*
- *To retain existing employment uses and foster a range of new industrial uses to meet the needs of the community.*
- *To ensure the provision of appropriate infrastructure that supports Leichhardt's employment opportunities.*
- *To retain and encourage waterfront industrial and maritime activities.*
- *To provide for certain business and office premises and light industries in the arts, technology, production and design sectors.*

The site has a maximum permissible FSR of 1:1 and no height control in the LLEP 2013. The public reserve to the north of the site is zoned RE1 Public Recreation.

*Figure 8 – LLEP 2013 Zoning Map (site within red boundary)*

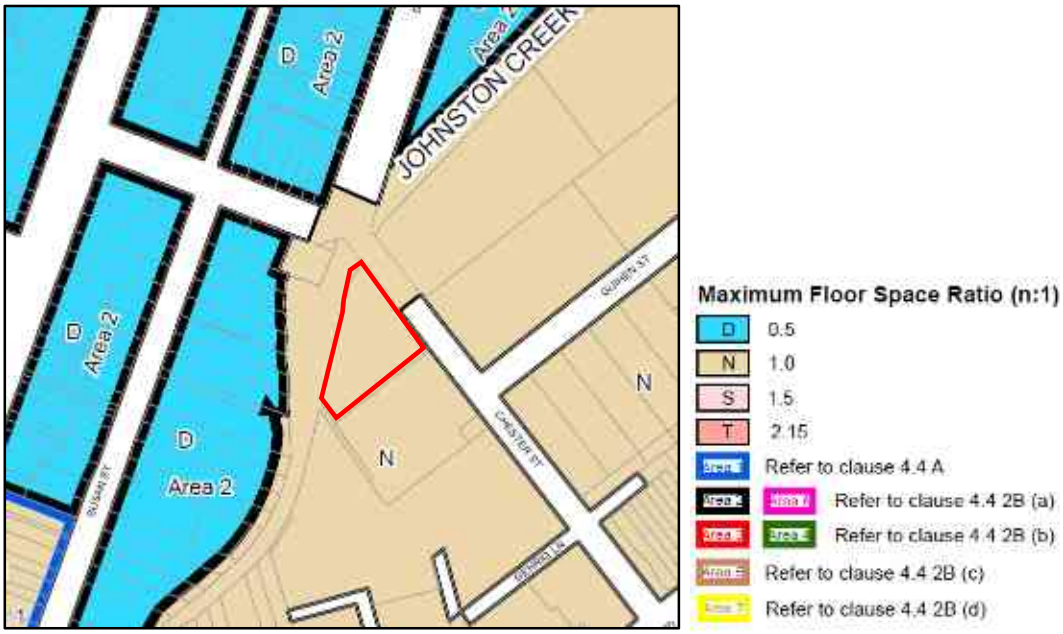


*Figure 9 - LLEP 2013 FSR Map (site within red boundary)*

*Figure 10 - LLEP 2013 Heritage Map (site within blue boundary)*

The site does not contain heritage items and is not within any conservation area but is adjacent to the Annandale Heritage Conservation Area.

The site is a Flood Planning Area and has a 100 year Flood Planning Level plus 500mm freeboard requirement, which indicates that the minimum freeboard floor level of the development including units/ dwellings should be a minimum of RL5.45.

The basement carpark needs to be protected up to the Probable Maximum Flood (PMF) level which is RL8.40. There is no minimum RL for the basement; however any part of the basement below the flood level will have to be flood proofed up to the PMF level.

## Parramatta Road Corridor Urban Transformation Strategy (PRCUTS)

The site is in the Camperdown precinct of Parramatta Road Corridor Urban Transformation Strategy which is a State Government endorsed strategy for the revitalisation of Parramatta Road corridor given statutory force via a Section 9.1 Ministerial Direction in November 2016 (Figure 11).

PRCUTS is a plan to drive and inform land use planning and development decisions as well as long term infrastructure delivery programs in the Parramatta Road Corridor. The Strategy is supported by an Implementation Tool Kit and comprises the following documents:

- Parramatta Road Urban Transformation Strategy
- Implementation Tool Kit:
  - Implementation Plan 2016 - 2023
  - Planning and Design Guidelines
  - Infrastructure Schedule
  - Urban Amenity Improvement Plan

Delivery of the Strategy relies on the implementation of the principles in PRCUTS and will occur over 30 years in the following indicative timeframes:

- Short term - 2016 - 2023
- Medium term - 2023 - 2036
- Long term - 2036 - 2050

The Strategy will be implemented through:

- State Environmental Planning Policies  for priority precincts (in the corridor to the west of the IWC local government area)
- planning proposals prepared by landowners or developers
- Comprehensive LEP reviews undertaken by councils

*Figure 11- Structure of Parramatta Road Strategy Documents.*

The key targets in the Strategy for the Camperdown area are:

- 1,400 new people by 2050
- 700 new homes by 2050
- 2,300 new jobs by 2050

Figure 12 illustrates the broad PRCUTS land use policy directions for the Precinct.

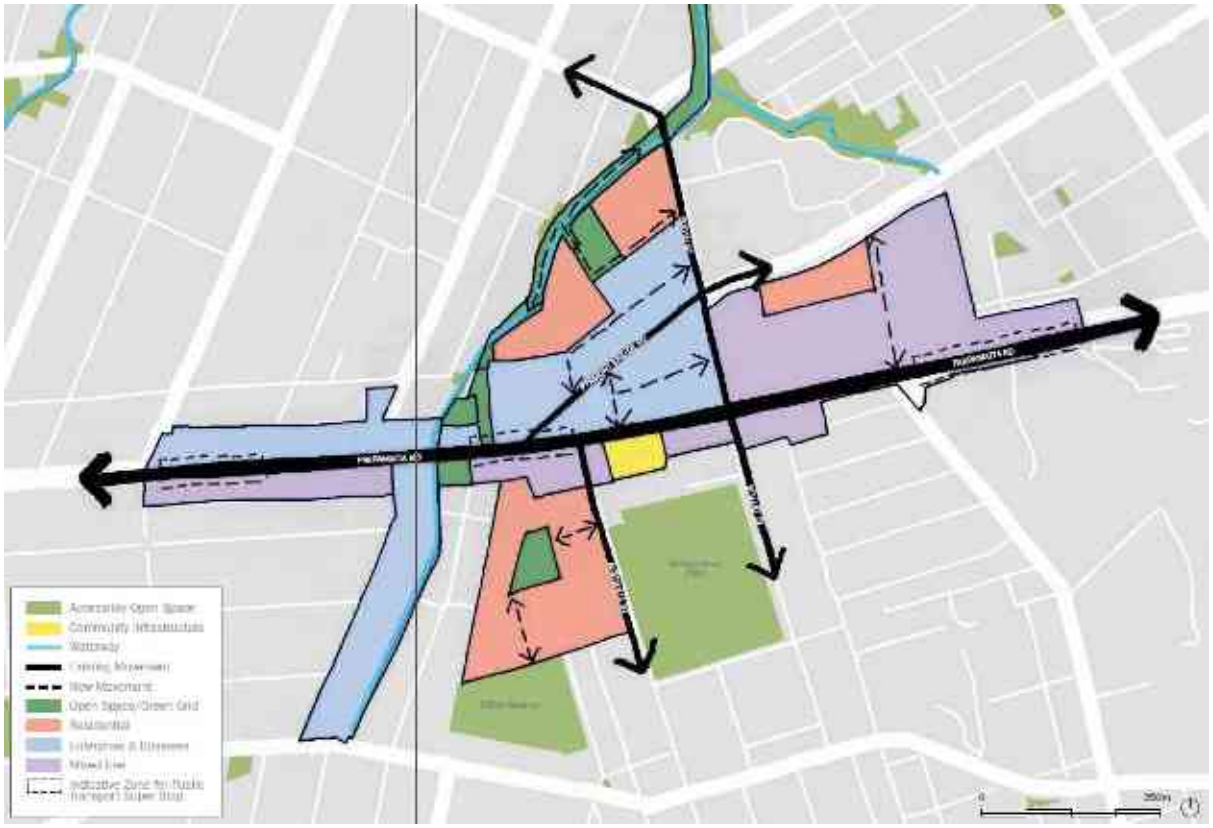

*Figure 12 - Structure plan for the redevelopment of Camperdown precinct*

PRCUTS sets out key actions associated with land uses; transport and movement; place-making; and open space, linkages and connections; and makes recommendations for future zoning, height and density controls to ensure a place-based approach for future development of the Corridor. Key actions related to the subject site and Camperdown precinct are considered in more detail later in this report.

The PRCUTS Implementation Plan 2016 - 2023 provides a methodological and sequential approach for growth and the alignment of infrastructure provision with that growth. The site is outside the PRCUTS '2016 - 2023 Release Area' which means that the redevelopment of the site should ideally be in the medium to long term between 2024 and 2054. (Refer to Figure 13 below)

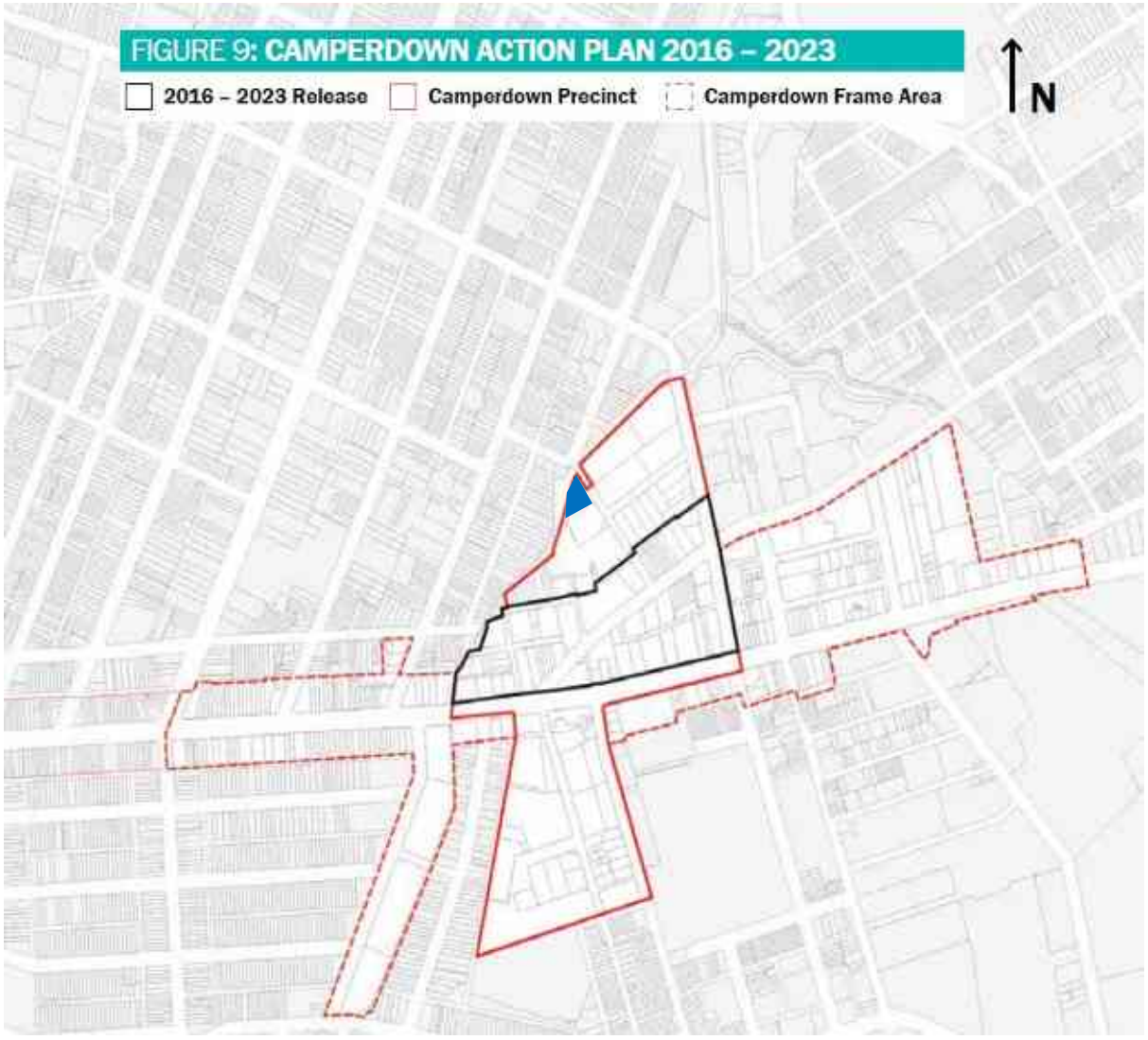


*Figure 13 - Extract from the PRCUTS Implantation Plan - Camperdown Action Plan 2016 - 2023. Subject site shown in blue is outside of the 2016 - 2023 release area shown in blue.*

Proposals that depart from this staging need to be assessed on their merit against the PRCUTS 'Out of Sequence Checklist' criteria to ensure that changes to the land use zones and development controls are timely and can be justified against the Principles and Strategic Actions of the Strategy.

PRCUTS recommendations and requirements have been taken into consideration in the assessment of this planning proposal.

## Part 1 – Objectives or intended outcomes

This Planning Proposal is to amend the Leichhardt Local Environmental Plan (LLEP) 2013 to enable redevelopment of 1-5 Chester Street, Annandale to:

- enable the redevelopment of 1-5 Chester Street, Annandale for a combination of light industrial and business floorspace with student housing above;

- ensure that the new development responds appropriately to the surrounding built form, land uses and desired future character of the area;

- provide a north-south pedestrian and cycling path and landscaping along Johnstons Creek; and

- deliver appropriate State and local infrastructure contributions.

## Part 2 – Explanation of the provisions

To achieve the intended outcomes, this Planning Proposal seeks to amend the Leichhardt Local Environmental Plan 2013 as follows:

- Rezone IN2 Light Industrial to B7 Business Park, and the proposed pedestrian and cycle path corridor 6m setback from Johnstons Creek to RE1 Public Recreation;
- Amend the Key Sites Map to identify the site;
- Amend the Floor Space Ratio Map to remove reference to the maximum permitted floor space ratio for the site;
- Include a new local provision to:
    - confirm the objective of the proposed amendments to encourage commercial, education, health and cultural sectors and associated industries in the Camperdown-Ultimo Collaboration Area;
    - allow a maximum floor space ratio of 2:1 including minimum FSR of 0.75:1 for businesses and light industries in the technology, bio-medical, arts, production and design sectors;
    - ensure that the 2:1 FSR control applied in design terms to the entire site as if the prospective RE1 zoned sections also had a permissible FSR of 2:1*;

      ***Note:** RE1 zoned land does not normally have a permissible FSR so this provision is required to prevent the 2:1 FSR control being applied to the B7 zoned section alone which would compromise the urban design intent of the planning proposal;

    - restrict the maximum building height to 17m or 5 storeys including any lift over-runs;
    - allow boarding house for student accommodation that would comply with the requirements of S*tate Environmental Planning Policy Affordable Rental Housing 2009;*
    - restrict any further bonus incentives from State Environmental Planning Policies;
    - ensure that the development will not significantly increase the amount of traffic on the adjoining street network including but not limited to Chester Street, Chester Street West, Susan Street, Taylor Street and Pyrmont Bridge Road;
    - provide a pedestrian and cycle path and landscaping along Johnstons Creek;
    - provide active frontages on Chester Street and towards Johnstons Creek;
    - ensure that the development will incorporate environmentally sustainable principles with a minimum of 4-star Green Star rating;
    - prohibit strata sub-division and the permissibility of any form of residential accommodation other than a boarding house;
    - minimise adverse amenity impacts on the surrounding residential and light industrial uses; and
    - remove the application of Clause 6.12 of the LLEP 2013 to the site.

The final clause to be inserted into Part 6 Additional Local Provisions would be subject to public exhibition, drafting and agreement by Parliamentary Counsel's Office but may be written as follows:

**Clause 6.21 Development of land at 1 - 5 Chester Street, Annandale**

1. The objective of this clause is to encourage commercial, education, health and cultural sectors and associated industries in the Camperdown-Ultimo Collaboration Area.
2. This clause applies to land 1 - 5 Chester Street, Annandale, being Lot 11 DP499846 and identified as '7 1-5 Chester Street, Annandale' on the Key sites map.
3. Notwithstanding clause 4.4, the maximum floor space ratio for development to which this a clause applies is 2:1 but only if the consent authority is satisfied that:
    a. at least 0.75:1 of the floor space ratio will be used for business premises and light industries in the technology, bio-medical, arts, production and design sectors;
    b. 1.25:1 of the FSR for a boarding house for student accommodation that would comply with the requirements of S*tate Environmental Planning Policy Affordable Rental Housing 2009*;
    c. consent for a development that relies on any other bonus floor space provisions will not be granted.
4. Notwithstanding clause 4.3, the maximum building height for development on land to which this clause applies is 17m.
5. Despite clause 6.12, development consent must not be granted under clause (3) for development that includes residential accommodation other than a boarding house.
6. Development consent must not be granted for the subdivision of this land.
7. Development consent must not be granted under clause (3) unless the consent authority is satisfied that the development will:
    a. not result in significant adverse amenity impacts on the surrounding neighbourhood;
    b. include the necessary design and acoustic measures to ensure that business and light industries within the development, as well as any existing industrial uses on land surrounding the development, do not have a significant adverse impact on the amenity of future residents of the development;
    c. provide landscaped pedestrian and cycle path through the site along Johnstons Creek;
    d. not significantly increase the amount of traffic on the adjoining street network including but not limited to Chester Street, Chester Street West, Susan Street, Taylor Street and Pyrmont Bridge Road;
    e. incorporate environmentally sustainable design principles including a requirement that the building will achieve a 4-star Green Star Rating and provisions for recycled water use; and
    f. Provide active frontages to Chester Street and Johnstons Creek.

## Part 3 – Justification

The proposed controls create an opportunity to revitalise the site in a way that responds to the surrounding built form, with a thoughtful transition to the Annandale Heritage Conservation Area/ Johnstons Creek and contributes to the creation of Camperdown-Ultimo health and education precinct.

The proposed height and floor space controls are based on a series of urban design analysis undertaken by IWC, Architectus, AE Design Partnership and DKO Architects.

### Height and Built form

The proposed height controls aim to set a street wall height along Chester Street that resonates with the existing building form, create set-backs on upper levels to provide predominantly a two storey wall generally along Johnstons Creek and manage the transition to the surrounding industrial and residential properties (Refer to Figures 14-18).

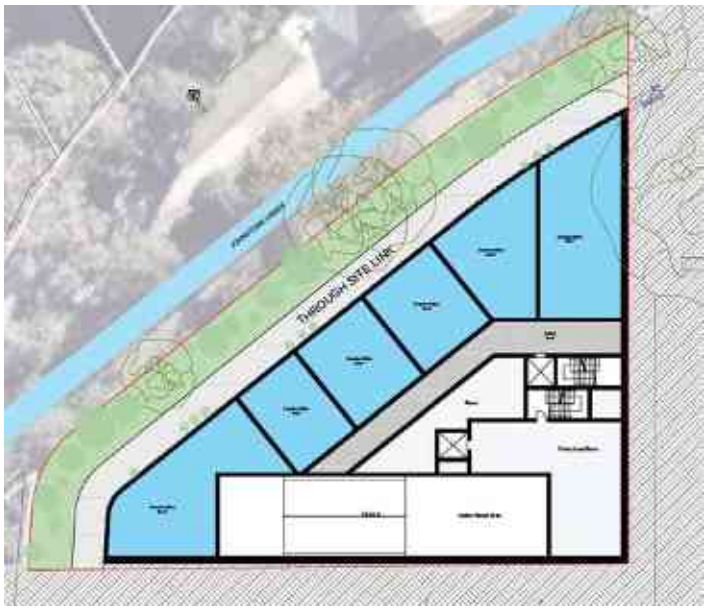


*Figure 14 - Lower ground floor with employment uses along the creek and Chester Street*

*Figure 15 - Level 1 with student housing uses*

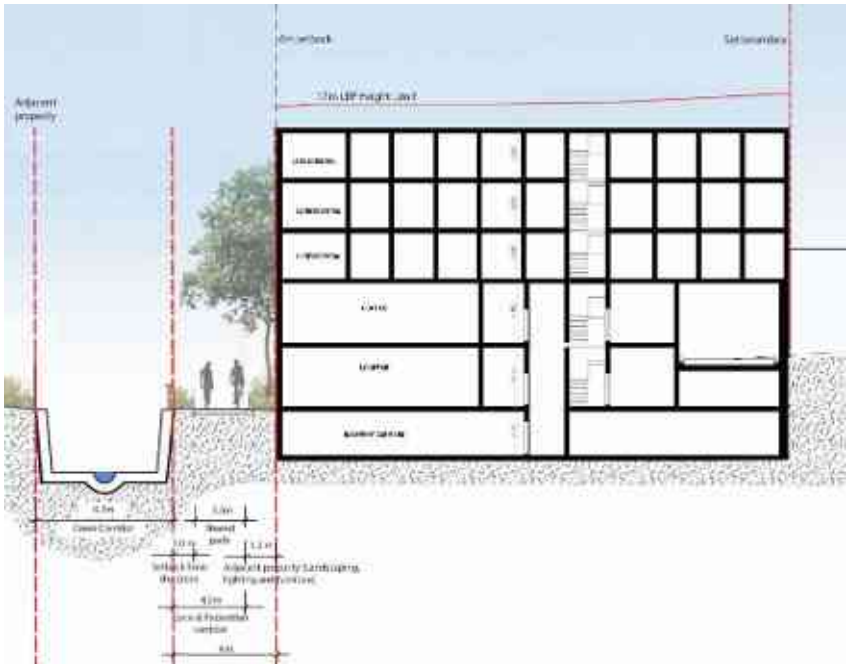

*Figure 16 - North South Section through the building indicating 6m setback from the creek and 17m (5 storey) height limit*

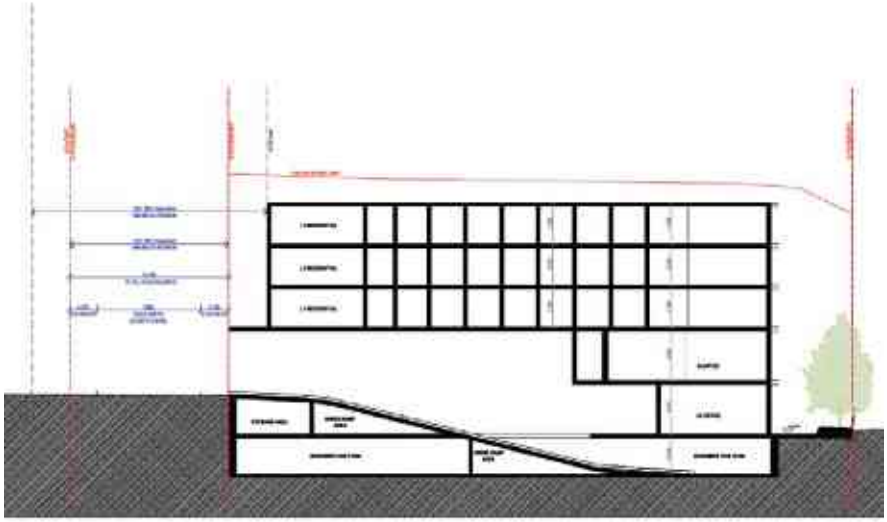

*Figure 17- East West Section through building and vehicular ramp housing 0m setback to employment sues and 3m setback to upper levels from Chester Street*

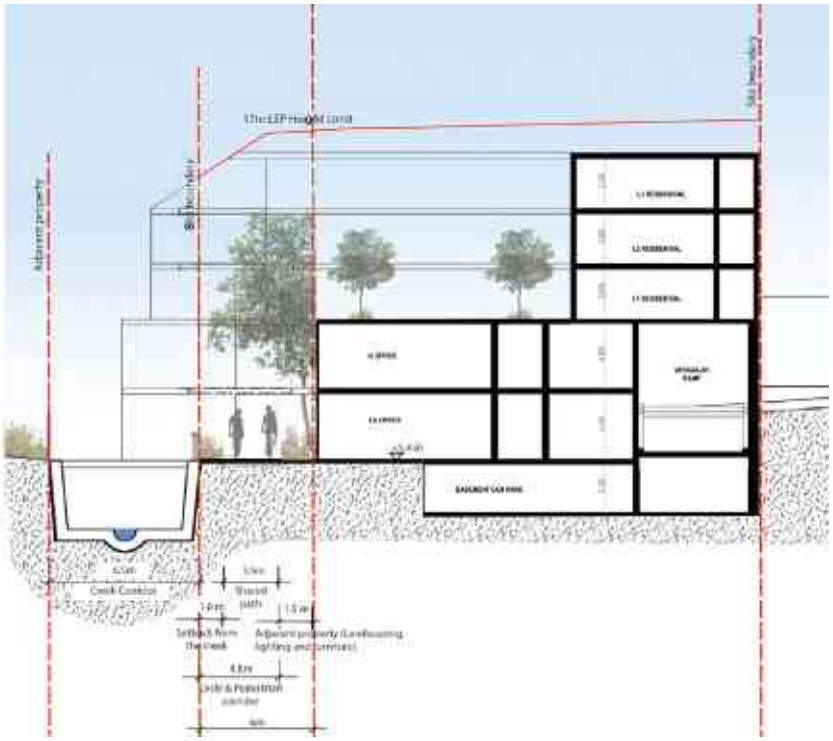

*Figure 18 - North-south section through the building and communal podium*

## Conservation area transition

The building layout has been skilfully designed to minimise visual impacts on the Annandale Heritage Conservation area by maximising the setback along Johnstons Creek and generally maintain a two storey scale towards the Creek with a 5 storey corner  to Chester Street.  The proposed heights are compatible with the recently approved development D/2019/125 at the adjacent Kennards' site at 1 - 19 Booth Street, Annandale which will create a six storey extension on the warehouse's near Chester Street.

*Figure 19- West Elevation to Chester Street (the existing 5 storey main building will have a new 6 storey extension) as approved D/2019/125 - 1-19 Booth Street, Annandale*

## Section A – Need for the planning proposal

**Q1. Is the planning proposal a result of an endorsed local strategic planning statement (LSPS), strategic study or report?**

The proposal is also consistent with IWC's LSPS which was adopted by Council on 25 February 2020. This has been discussed further in detail under Q4 of the strategic merit assessment test.

The planning proposal also reflects the intent of various PRCUTS studies. However, the proposal is only partially consistent with the PRCUTS recommendations that the site be developed for Medium Density Residential (R3) uses with an FSR of 1.5:1 and a maximum height of 17m.

The inconsistency is justified by post-PRCUTS studies and reports prepared by the Greater Sydney Commission for the Camperdown Ultimo Collaboration Place Strategy and by Council for its Housing and Employment Land Strategies.

The proposal is underpinned by the Greater Sydney Commission's vision for the growth of the Camperdown-Ultimo Health and Education Precinct for innovation, health and education uses as outlined in the *Greater Sydney Region Plan 2018*, *Eastern City District Plan 2018* and *Camperdown-Ultimo Collaboration Area Place Strategy 2018*.

**Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?**

The planning proposal is considered to be the best means to fulfil a core objective of Council’s draft Employment and Retail Land Strategy of retaining the site's employment floorspace and to provide student accommodation to support the education and health institutions in the Camperdown-Ultimo Collaboration Area. It would also contribute to PRCUTS vision of Camperdown as a future health and education precinct.

The detailed urban design studies and other technical investigations, discussed later in this section, ensure that the planning proposal demonstrates the best response to the site and its context.

## Section B – Relationship to strategic planning framework

**Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?**

The planning proposal meets the objectives of and gives effect to planning priorities in the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) 2016, Greater Sydney Region Plan (GSRP) 2018, Eastern City District Plan (ECDP) 2018 and Camperdown-Ultimo Collaboration Area Place Strategy (C-U CAPS) 2018.

### 1. Greater Sydney Region Plan 2018

The Greater Sydney Region Plan is the Greater Sydney Commission’s (GSC) vision for a Greater Sydney of three cities, where most residents live within 30 minutes of their jobs and services. It sets a 40-year vision and establishes a 20-year plan to manage growth and

change for a Greater Sydney, informing district and local plans and the assessment of planning proposals.

The GSRP contains 10 directions and 40 objectives to guide future growth, covering infrastructure, housing, economic development and sustainability. This planning proposal is consistent with the objectives of GSRP, and gives effect to the following objectives in particular:

a) *Objective 11: Housing is more diverse and affordable*

The proposal would deliver student accommodation in a new-generation boarding house to support the growth of this future health and education precinct.

b) *Objective 12: Great places that bring people together*

The proposal would encourage active transport use, car sharing and provide electric vehicle charging stations, to be consistent with the GSRP Strategy 12.2. These provisions are in the draft-DCP associated with the planning proposal.

Parking provision will reflect the proximity of this site to frequent bus services. The proposal and its parking provision will be updated if the outcomes of the current Precinct transport study due to be completed by September 2020. This update is recommended as a pre-exhibition Gateway condition.

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

The subject site is in the GSC Camperdown-Ultimo health and education precinct, with its existing major health, education and research institutions and opportunities for agglomeration and clustering benefits. The Region Plan discusses the productivity benefits that can be generated from ecosystems of businesses and research organisations that cluster around major universities and hospitals to create this type of an “innovation precinct”.

The proposed development has the potential to contribute to this innovation precinct. The proposed controls will promote the development of floor space for light industry, production, technology and creative uses. The proposed student accommodation also meets this objective’s aim of providing housing for students within the precinct.

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

The proposal would retain employment uses -to complement the 'retain and manage approach' outlined for the industrial and urban services land in the Eastern City District.

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

The proposal is consistent with this objective as it will provide a walking and cycling link along Johnstons Creek through the site and contribute to a north-south priority green link.

The full route will be delivered incrementally as the sites in the precinct redevelop and by direct Council provision of some sections.

## 2. Eastern City District Plan 2018

The Eastern City District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters along the way to achieve the 40-year vision for Greater Sydney. The District Plan has 22 planning priorities which planning authorities must give effect to in strategic planning and preparing planning proposals. This planning proposal is consistent with the District Plan and gives effect to the following planning priorities:

a) *Planning Priority E5: Providing housing supply, choice and affordability with access to jobs, services and public transport*

The planning proposal will provide student housing close to the University of Sydney (10 mins walk to Susan Wakil Building) and several other educational institutions as well as jobs, retail and services. This accommodation is specifically designed for the needs of students, with small individual bedrooms for singles, shared living facilities and common areas. This will meet the housing diversity objective.

Redeveloping the site for student accommodation also meets the housing supply objective, while maintaining consistency with other priorities such as economic development. In addition, boarding houses are not strata subdivided, so they have a degree of potential for future adaptive re-use of the building for employment uses or non-residential redevelopment of the site.

b) *Planning Priority E6: Creating and renewing great places and local centres, and respecting the District's heritage*

The planning proposal will provide a diversity land use mix, high amenity and walkability in a good location, close to public transport. .

The building has been designed to recognise the dual function of streets as places for people and movement. The provision of employment uses along Chester Street and Johnstons Creek would assist in providing high-quality public domain outcomes through activation and passive surveillance.

c) *Planning Priority E8: Growing and investing in health and education precincts and the Innovation Corridor*

As discussed previously, the site is part of the Camperdown-Ultimo Collaboration Area Innovation Corridor which includes one of the largest and most comprehensive health and education precincts in Greater Sydney. . The innovation precinct is rapidly and continually expanding with multiplier effect on innovation, creative industries and tech start-ups. Providing accommodation for workers and students close to health and education precincts will contribute to the productivity of the precinct.

d) *Planning Priority E12: Industrial and urban services land is planning, retained and managed*

ECDP requires that all existing industrial and urban services land should be safeguarded from competing pressures, especially residential and mixed-use zones. Specifically, these industrial lands are required for economic and employment

purposes. The management of these lands should accommodate evolving business practices and changes in needs for urban services from the surrounding community and businesses.

The ECDP mentions that its ‘retain and manage approach’ to protecting industrial land does not apply to the Parramatta Road Corridor from the 'retain and manage approach'. Council’s more recent Employment and Retail Land Study however demonstrates that the whole local government area including the PRCUTS area has a short of industrial land that it is essential that industrial land in the Corridor is also retained and managed.

PRCUTS recommends rezoning this site to Medium Density Residential (R3) primarily for affordable housing, key workers and student housing. The proposal with its core employment focus is considered to be a better outcome than losing the entire site to purely residential uses as it:

- Retains the existing amount of floorspace for light industrial uses, thus overcoming the impediment of loss of industrial uses and urban services
- Will support the health, education and innovation sectors through the site-specific local provision; and
- Provides medium density residential uses for students in line with PRCUTS.

Whilst the prospective loss of the car repair business on this site would be irreversible, it is considered that the proposed employment uses on the site will align with Planning Priority E12. This is a good compromise and would result in better outcomes for the precinct than strictly applying the ECDP and PRCUTS directions. The boarding house provision could also potentially allow for future redevelopment of the site for non-residential uses as boarding houses cannot be strata-subdivided.

b) *Planning Priority E17: Increase urban tree canopy cover and delivering Green-Grid connections*

The proposal is accompanied by a draft Voluntary Planning Agreement offer to dedicate land to Council along Johnstons Creek for pedestrian and cycling link. This link has been identified as a part of a key north-south connection form Parramatta Road to Booth Street and Bicentennial Park.

Further amendments are suggested in the urban design comments to provide an increased basement setback for deep soil planting along this route. The proposed amendments will help revitalise the Johnstons Creek corridor and increase the tree canopy cover.

c) *Planning Priority E19: Reducing carbon emissions and managing energy, water and waste efficiently*

This planning priority aligns with the NSW Government’s target for net zero emissions by 2050. This planning proposal will create more efficient, low carbon buildings through a redevelopment with a minimum 4-star Green Star Rating for the student accommodation. Council's LSPS nominates Camperdown as a low-carbon high performance precinct. Whilst a holistic response is required at the precinct level

to achieve this vision, it is expected that the site-specific provisions for this site will contribute to achieving this wider vision. In addition, provisions have been suggested in the LEP amendment to ensure the development is future-proofed for recycled water use.

## 3. Camperdown-Ultimo Collaboration Area Place Strategy

The Camperdown Ultimo Collaboration Area Place Strategy (C-U CAPS) was released in February 2019 and identifies a vision, priorities and actions for future investment and growth in the Collaboration Area. The strategy identifies three activity nodes being Camperdown, Haymarket and Eveleigh. The site adjacent to the Camperdown activity node on the periphery of the innovation ecosystem (being the extent of the Collaboration Area). The site is within an area identified as a health, education and research anchor that stretches from Camperdown to Haymarket as shown in Figure 20 below.

*Figure 20- Extract from Camperdown-Ultimo Place Strategy indicating the extent of the Collaboration Area*

The vision for the precinct highlights urban challenges for the area, including the following ones of particular relevance to this site and proposal:

- the conversion of industrial and commercial building stocks to residential or mixed-use developments can limit the availability of employment land and affordable spaces for innovation, research, creative industries and artists, and collaborative projects, and
- lack of affordable housing for the community, students, key and creative workers, and limited short-medium term accommodation for academic and health visitors.

The proposal supports the strategy by retaining employment floor space on the site to support creative industries, innovation and research, whist also providing student housing. The table below provides an analysis of the proposal against C-U CAPS.

| Action | Consideration |
|---|---|
| **Priority 4: Provide housing supply, choice and affordability in great places for people** | |
| Action 14: Require the provision of affordable housing in and close to the Collaboration Area, including in mixed-use developments, consistent with government targets. | The proposal will contribute towards housing choice by providing student housing in the Collaboration Area.<br><br>There are concerns regarding the proponent's claim of a 100% contribution towards affordable housing through the provision of 'new gen' boarding house. Recent research by UNSW on behalf of the Southern Sydney Regional Organisation of Councils (SSROC) has found that this type of boarding house is not delivering affordable rental housing options for those who need them.<br><br>The Affordable Rental Housing SEPP (ARHSEPP) permits boarding houses as a form of affordable housing but does not include any provisions to require boarding house accommodation to be affordable. Council may have the power through the ARHSEPP to approve a boarding house development that proposes to create affordable housing but has no power to enforce affordable rents.<br><br>In the absence of appropriate mechanisms to ensure affordable rents for students, the proponent's offer of monetary contributions though the VPA can be applied to delivery of affordable housing by Council in other places. |
| Action 15: Explore initiatives to provide diverse housing, including affordable housing for key workers and students. | The proposal would provide student housing in the Collaboration Area. |
| **Priority 8: Support the role and function of employment lands** | |
| Action 26: Retain and manage commercial and business activities, particularly small businesses and tech start-ups, by safeguarding business zoned land from conversion that allows residential development. | The proposal will retain the existing employment floorspace on the site to create a suite of small workspaces, high technology and creative industries targeted at the innovation, health and education sectors. |
| Action 28: Advocate for and deliver a minimum percentage requirement for affordable space in developments for tech start-ups, innovation, creative industries, cultural uses, community uses and artists within and beyond the Collaboration Area. | The proposal is inconsistent with this Action as no specific provisions are being made to provide a percentage of affordable space in the development.<br><br>To do it might render an otherwise beneficial development aligned with policy objective unviable. |

| Priority 9: Enhance the network of high quality open and public space linked by the Greater Sydney Green Grid | |
|---|---|
| Action 29: Identify, prioritise and implement projects that enhance the Liveable Green Network and Greater Sydney Green Grid, increase tree canopy cover and vegetation, encourage health and activity, and optimise access to multi-use, shared green spaces, including:<br>• Broadway and Parramatta Road<br>• City Road<br>• Harris Street and the Powerhouse Precinct<br>• the Johnston's Creek Green Grid cycling and pedestrian connection to Bicentennial Park | The proposal is consistent with this vision as it will build part of the Johnstons Creek Green Grid cycling and pedestrian connection through an arrangement works-in-kind through an arrangement and dedication of the land to Council. |

## 4. Parramatta Road Corridor Urban Transformation Strategy

The PRCUTS was released in 2016 by UrbanGrowth NSW (now Landcom) and with a vision, land use and transport principles to accommodate 27,000 new homes and 50,000 new jobs in a range of industries along the Corridor over the next 30 years. The Strategy is given statutory force by way of a Ministerial direction under Section 9.1 of the Act. Its seven land use and transport planning principles and relevant strategic actions are discussed below.

The site is the Camperdown Precinct, and recommended for residential uses. PRCUTS states that the area is transitioning to a vibrant high-density locality with diverse uses and buildings of different scales which will continue to evolve into an attractive, highly urbanised neighbourhood with high quality amenities. A key action for the Camperdown Precinct is to focus residential development for students, key workers, and affordable housing.

The proposal supports the objectives and key actions for the Camperdown Precinct as it would increase the supply of student housing close to high capacity public transport connections along Parramatta Road.

PRCUTS is supported by an implementation toolkit to assist councils and other stakeholders by guiding where and when rezoning should occur, and what infrastructure is required to support land use changes. The relevant aspects of the implementation toolkit are discussed below.

**Consistency with the PRCUTS Policy Framework (Strategy Report 2016)**

The Planning Proposal is consistent with the Strategy's Principles and Strategic Actions in the following way:

| Strategic Action | Consideration |
|---|---|
| **Principle 1: Housing choice and affordability** | |
| Review, update or prepare a new Local Housing Strategy that implements the Parramatta Road Corridor Urban Transformation Strategy's Principles and | Council's Housing Strategy 2020 has reviewed PRCUTS. Consistency with Council's Housing Strategy is discussed in the sections below. |

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| Strategic Actions, taking into account changed economic and demographic characteristics, new transport opportunities and population projections. | |
| Provide 'diverse housing' for both purchase and rental markets that satisfies the objectives and Design Criteria of the Apartment Design Guide, that may include:<br>• lower cost market housing for rent or purchase, including new generation boarding houses with high quality shared spaces<br>• moderately priced housing that is affordable to purchase for households earning up to $150,000 or 80-190% of the median income<br>• rental properties with long-term tenures and optional extensions in place - housing that uses design innovations, resulting in new products such as decoupled/optional car parking, which are suited to essential service workers, young 'city makers' early in their careers looking for 'starter homes', families with children, and downsizers/seniors<br>• **student accommodation**<br>• aged-care housing<br>• housing that promotes innovation in other ways across type, tenure, construction<br>• methodology or other mechanisms to make such housing more attainable to diversity of income groups. | The proposal is consistent with this Action as it would contribute to the diversity of housing in Camperdown Precinct by providing new-gen boarding house for student accommodation.<br><br>The boarding house is not subject to the provisions of Apartment Design Guide. Although provisions have been suggested for the LLEP amendment to ensure that the proposed development has a high design standard. |
| Establish a mix of dwelling sizes, including studios, one bedroom and three bedroom dwellings to be delivered in residential, mixed use and shop-top developments that cater to the future population profile of the Precincts and Frame Areas, having regard to any recommendations of the Local Housing Strategy, the requirements of State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development, and the Apartment Design Guide. | The proposal would increase the greater mix of dwelling types and sizes by providing student housing. |
| Explore incentives such as value sharing where rezoning is necessary to achieve renewal of private sites to capture a proportion of the increased land value to fund affordable, diverse and social housing projects. | The proposal is accompanied with a valuation report and letter of offer to enable value sharing. |

| **Principle 2: Affordable Housing** | |
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| Provide a minimum of 5% of new housing as Affordable Housing, or in-line with Government policy of the day. | The proposed student housing would be delivered under the provisions of ARHSEPP 2009, however, it may not necessarily result in a genuine affordable development as there is no provision to enforce the rents.<br><br>The monetary contributions proposed in the Voluntary Planning Agreement offer letter could be potentially used to fund affordable, diverse and social housing projects. |
| Amend the underlying Local Environmental Plan(s) to insert Affordable Housing principles. | Not applicable. |
| Amend State Environmental Planning Policy No 70 – Affordable Housing (Revised Scheme) to identify that there is a need for affordable housing in all local government areas in the Corridor. | Not applicable. |
| Prepare model 'development consent' conditions for inclusion into future planning proposals/rezonings to enable the levying of monetary contributions that can be used to fund Affordable Housing. | Not applicable. |
| Investigate planning provisions and mechanisms to deliver more Affordable Housing within the Precincts. These could include density bonuses or offsets, decoupled parking, relaxation of development contributions, and mechanisms to streamline and expedite assessment and approvals processes for Affordable Housing projects. | The proposed FSR control, compared to the PRCUTS recommended FSR, has in effect facilitated a density bonus in exchange for a range of community/monetary benefits including retaining employment floorspace, providing a cycling and pedestrian link along Johnstons Creek and monetary contribution. |
| **Principle 2: Diverse and resilient economy** | |
| Update Local Environmental Plan(s) to permit a wider range of employment uses, consistent with the recommended land uses, heights and densities identified in the Parramatta Road Corridor Planning and Design Guidelines. This includes:<br>• tailoring commercial and business zones to provide greater flexibility and opportunity for the establishment of new business models particularly for small to medium business enterprises<br>• facilitating increased densities to encourage the co-location of multiple uses in one building, including industrial functions, where | Council is currently preparing its Employment and Retail Lands Strategy to inform its new LEP. The strategy identifies that there will be a severe shortfall of industrial/ employment zoned land in 2036. As a consequence, industrial land should not be rezoned/ lost to any other uses.<br><br>However, it acknowledges the significance of Camperdown in relation to the surrounding health and educational institutions and supports its transition from light industrial uses to high technology industrial and office uses related to biomedical, production, technology, creative and design sectors. |

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| appropriate. | The proposal is consistent with this Action as it requires a minimum of 980 sqm of floorspace designed to accommodate the type of employment uses outlined above for the full utilisation of the FSR. |
| Implement the built form controls identified in the Parramatta Road Corridor Planning and Design Guidelines to encourage new typologies that overcome these challenges and facilitate evolving and innovative employment uses. | The proposal implements the density and height recommendations of PRCUTS. PRCUTS recommends an FSR of 1.5:1 for the site. The proposal is for a FSR of 2:1. A FSR incentive of 0.5:1 is included in the proposal to facilitate evolving and innovative employment uses (min. 0.75:1 FSR) in the precinct.<br><br>Its proposed height of 17m matches the PRCUTS recommendation for maximum building height. |
| Actively explore and promote the use of the adaptable building design to enable a range of uses over time, and likely transitions in consumer preferences, transport options and travel patterns. | Since boarding houses are not strata subdivided, their provision is less prohibitive for future adaptive re-use of the building for employment uses or non-residential redevelopment of the site. Although no such provision applies to the creative suites proposed on the lower ground floor and ground floor levels.<br><br>The proposed amendment includes a provision to prohibit strata sub-division of the employment floorspace on the site in order to enable its re-use/ re-design in the future. |
| Develop planning controls that accommodate new models of large retail stores, in developments with multiple uses, in suitable parts of the Corridor, such as Auburn, Ashfield and Taverners Hill. | Not applicable |
| Investigate the possible elevation of employment clusters or hubs in the Corridor to be recognised as Specialised Centres in A Plan for Growing Sydney and District Plans. Possible centres for consideration include Auburn as an employment hub and Camperdown as a new strategic centre. | The proposal supports the Camperdown Ultimo Health and Education Precinct cluster by retaining employment uses on the site to support creative industries, innovation and research, and by providing student housing. |
| Promote contemporary models of retail infill development, including multi-storey supermarkets and car showrooms that can offer more appropriate development outcomes within an established urban environment. | The location of the site precludes retail infill development and will facilitate a contemporary mixed-use development with potential business/light industrial uses on lower-ground/ground floor levels with student accommodation on upper levels. |
| **Principle 3: Accessible and Connected** | |
| Implement the Sydney CBD to Parramatta Strategic Transport Plan. | This is to be implemented by Transport of NSW and has not yet been actioned. |
| Amend the State Environmental Planning | This is to be implemented by DPIE and has |

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| Policy (Infrastructure) 2007 to identify Parramatta Road between Burwood and the Sydney CBD as a strategic corridor, inserting provisions that require planning proposals and development applications along the Corridor to be referred to Transport for NSW for comment, particularly at and around future superstop locations. | not yet been actioned.<br><br>Council/DPIE are preparing a precinct-wide transport study to determine the public and active transport improvements required to support the projected growth in PRCUTS. This study should be completed by September 2020. The proposal should be updated amended post-Gateway in response to the outcomes of this study.<br><br>Pre-consultation with TfNSW has been demonstrated by the proponent. Further consultation will be undertaken following the Gateway Determination. |
| Apply the road planning framework to guide the planning, development, management and operation of the Parramatta Road Corridor road network according to 'movement–place' principles. | The PRCUTS identifies a hierarchy of streets which recognise their movement / place function. Chester Street is identified as local street. The proposal is appropriate in the context of this designation. |
| **Principle 4: Vibrant communities and places** | |
| Deliver each Precinct along the Corridor as a '15 minute neighbourhood' through land use changes that implement the following principles:<br>• improved walkability, cycling and safety to support healthier communities<br>• improved housing choice and diversity - increased usability of, and access to, safe open spaces<br>• improved local economic opportunities - adequate local services and infrastructure<br>• access to public transport. | The proposal is consistent with all these principles as discussed throughout this report. |
| Implement planning provisions to deliver active frontages in and around appropriate locations as illustrated on the Precinct Plans within the Parramatta Road Corridor Planning and Design Guidelines. | Chester Street is not identified as an area requiring active frontages. The proposal will however enhance activation through industrial and creative office uses at the ground floor which address the street and Johnstons Creek. |
| Strategically rezone parts of the Corridor (or where appropriate land outside the Corridor) for social infrastructure purposes in line with the Precinct Plans within the Parramatta Road Corridor Planning and Design Guidelines, Implementation Plan 2016 -2023 and Infrastructure Schedule. | Not applicable |
| Implement development controls that incentivise the delivery of social infrastructure, such as floor space bonuses, and discounting or excluding floor space | The proposal for FSR 2:1 includes a FSR incentive of 0.75:1 to incentivise employment uses. |

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| provided as social infrastructure. | |
| Explore new models to design, finance and deliver education and health community assets in partnership with local councils, government agencies and the private sector. | Not applicable |
| As a first preference and where appropriate, optimise or embellish existing assets through solutions such as:<br>• increasing the size, amenity and functionality of existing facilities to expand existing capacity<br>• renewing existing assets to provide contemporary spaces or installing additional features so facilities can become multi-purpose and cater to different groups<br>• upgrading features within existing facilities so they can accommodate a greater capacity<br>• developing partnerships with other community infrastructure providers, including private or other government agencies, such as the Department of Education, or Local Health Districts, to enable the shared use of facilities<br>• **incentivising the private sector to deliver community infrastructure.** | The proposal is accompanied with a letter of offer to dedicate land to Council for a section of the pedestrian and cycling path along Johnstons Creek which would contribute towards Council's assets to support the community. |
| Implement development controls that encourage the adaptive reuse of heritage items in the Corridor such as additional permitted uses, heritage incentive schemes, Section 94 exemptions, and accelerated or prioritised planning processes for development that appropriately preserves, maintains and utilises these community assets. | The site does not contain any heritage items, however urban design and heritage impact assessment reports respond to the heritage context in the surrounding area. |
| Implement transferable development rights for significant heritage conservation and development projects, where appropriate. | Not relevant |
| Review and modernise the heritage listings concurrently with rezoning proposals, with a stronger focus on proactive heritage identification and preservation. | Not relevant |
| Drawing on the Parramatta Road Corridor Planning and Design Guidelines, identify neighbourhoods and streetscapes through future rezoning processes, where existing character and amenity should be retained and should not be subject to renewal. | The proposal complements the objectives of Planning and Design Guidelines.<br><br>Former Leichhardt Council's 2016 Parramatta Road Heritage Study did not consider this part of the precinct should be retained. |
| Prepare and implement a design excellence strategy. | The proposal has been the subject of a rigorous design process by the proponent's |

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| | consultants, Council officers and external independent peer review undertaken by Architectus.<br><br>The proposed design is based on good urban design principles and would result in revitalisation of the site.<br><br>In addition the future development applications would be considered by the Inner West Council's Architectural Excellence Panel, to ensure any future development for the site demonstrates design excellence. |
| Incorporate the range of design approaches and measures identified in the Parramatta Road Corridor Design Guidelines to attenuate the effects of noise and air pollution. | An acoustic study has been prepared confirming that noise impacts can be suitably attenuated. |
| Use the development typology examples in the Parramatta Road Corridor Planning and Design Guidelines to inform future development controls. | The proposal complements the residential development typology examples in the Planning and Design Guidelines. |
| **Principle 5: Green spaces and links** | |
| Strategically rezone parts of the Corridor for open space purposes, with a view to allocating land to create a high quality interconnected network of publicly accessible open space throughout the Corridor. | The proposal will contribute public open space through land dedication and provision of part of a pedestrian and cycling link. |
| Provide a diverse range of connected, high quality open space and public domain area to each Precinct in accordance with the Precinct Plans that ensures:<br>• local parks within 400m safe walking distance of at least 95% of all dwellings<br>• additional small local parks or urban spaces within 200m of activity centres and higher density residential areas<br>• active open space within 1km of 95% of all dwellings<br>• linear parks and trails linked to waterways, vegetation corridors and road reserves within 1 km of 95% of all dwellings. | The site is considered to be in good location as it is adjacent to an existing local park on the other side of Johnstons Creek with active transport links to large public spaces to the north. There are other active recreation facilities at Camperdown Oval whichare 750m south of the site.<br><br>The development will overlook the linear park along Johnstons Creek which will be implemented more fully over the next few years. .<br><br>It is also noted that the future resident students, would also use parks and open spaces provided by Universities and other tertiary institutions. As such, the proposal would not burden on the surrounding existing open space infrastructure. |
| Implement building setbacks as identified on the Precinct Plans within the Parramatta Road Corridor Planning and Design Guidelines. | The proposed setbacks recommended in the Planning and Design Guidelines have been reviewed in the urban design reports. The P&D Guidelines for the entire precinct are |

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| | broad-brush and high-level as these for the entire precinct. These require to be revisited on a site-by-site basis to achieve the desired design objectives.<br><br>The proposed design demonstrates that it is complementary to the objectives of the P&D Guidelines and would result in better outcomes. |
| **Principle 6: Sustainability and resilience** | |
| Commence the amendment of State Environmental Planning Policy (Sustainability Building Index: BASIX) 2004 to increase the water and energy targets as identified within the Parramatta Road Corridor Planning and Design Guidelines. | The proposed 4-Star green Star rating would exceed the sustainability targets of PRCUTS. This could be implemented through inclusion of appropriate controls in the LEP and DCP. |
| Implement comprehensive built form strategies for building efficiency, renewable energy, strategic parking, public domain and sustainable infrastructure to target the long-term achievement of:<br>• 20% reduction in greenhouse gas emissions<br>• renewable energy installation<br>• 30% reduction in peak electricity demand<br>• 30% reduction in water consumption<br>• >15% of water delivered by non-potable sources, including rainwater<br>• or recycled water<br>• 30% reduction in car use - 10-15% car share take-up rate. | The proposed LEP /DCP provisions in relation to 4-Star Green Star rating, recycled water use and reduced parking rates/ provision of car-sharing will help achieve these targets. |
| **Principle 7: Delivery** | |
| Implement the Implementation Plan 2016 - 2023. | The proposal is accompanied by the Out of Sequence Checklist to justify its 'bring forward' approach. |
| Establish a robust funding mechanism to apply to new rezoning/development proposals that will fund the local and regional infrastructure demands required to service the future population growth in the renewed Corridor. | The proposal is supported by an Integrated Infrastructure Delivery Plan as required by the Out of Sequence Checklist. This IIDP has been independently peer reviewed as satisfactory. |
| Advise and assist councils in the revision of local contributions plans to address funding of local infrastructure and services in the Corridor. | This work has been commenced by Council. However, in the absence of an Inner West local contributions plan, the proposal's infrastructure impacts and needs that could arise from it have been assessed and addressed in the Integrated Infrastructure Delivery Plan. |

## Consistency with relevant Camperdown Precinct Key Actions

| Key Action | Consideration |
|---|---|
| **Land uses** | |
| Prioritise Camperdown Precinct for **biotechnology and employment uses** that support the growth of the nearby institutions | Consistent |
| Focus residential development on **students**, key workers, and affordable housing | Consistent |
| **Transport and movement** | |
| Capitalise on the improved, high-capacity public transport connections along Parramatta Road to the Sydney CBD | The proposal will be updated post-Gateway following the outcomes of DPIE/IWC precinct-wide transport study |
| Reinforce active transport, with low-priority given to additional private vehicle movements. | Consistent |
| **Place-making** | |
| Adapt, retain and celebrate the existing industrial heritage | Consistent |
| Create streets that connect residents and workers to small, diverse, local and regional open spaces | Consistent |
| **Open space, linkages and connections** | |
| Prioritise works to complete the Johnstons Creek green corridor, connecting the Precinct to the Bicentennial Parklands and the harbour foreshore walks | Consistent |
| Provide new cycle routes along Johnston's Creek, Mathieson Street, Chester Street and Guihen Street to improve connections with other cycleways | Consistent |

## PRCUTS Implementation Tool Kit

PRCUTS Implementation Toolkit has been given statutory force through the associated s9.1 Ministerial Direction and must be considered by Councils and stakeholders when making land use decisions. The toolkit includes:

1. Planning and Design Guidelines
2. Implementation Plan 2016-2023
3. Urban Amenity Improvement Plan
4. Infrastructure Schedule

### Consistency with PRCUTS Planning and Design Guidelines

The Planning and Design Guidelines have been developed to inform future controls in local environment plans and development control plans and should be considered when the Strategy is being implemented through rezoning proposals.

The PRCUTS Planning and Design Guidelines recommends the following zoning and built form controls for the site:

- Zone: R3 Medium Density Housing
- FSR: 1.5:1
- Height of buildings: 17 metres

The PRCUTS – Planning and Design Guidelines establish the following vision for the Camperdown precinct:

*'Camperdown Precinct will be home to high-quality housing and workplaces right on the edge of the CBD, well connected to the surrounding city, parklands, health and education facilities and focused on a busy and active local centre.'*

It also sets out a series of principles to achieve the vision. The proposal's consistency with these principles is demonstrated in below.

| Considerations | Comments |
|---|---|
| **Section 12.4: Future Character and Identity (Vision)** | |
| Future proofing the Precinct and parts of the Frame Area for long term strategic land uses. | The proposal is consistent with the proposed strategic land-uses and vision for the Camperdown precinct.<br><br>The proposed LEP provision to prohibit strata sub-division will help future-proof the site so that other uses could occupy the building in response to changing population needs. |
| Increasing the potential for student housing | Consistent |
| Reinforcing the significant elements of the eight (8) local character areas recognised in the Parramatta Road Corridor Fine Grain Study, September 2016 | The key elements relevant to the site identified in the PRCUTS Fine Grain Study are the site's relationship to surrounding open space and local heritage items including the Chester Street kerb and gutter and the warehouse at 52-54 Pyrmont Bridge Road (corner Guihen and Chester St).<br><br>The proposal responds to the objectives and guidelines of the fine grain study as discussed below. |
| For each character area, implementing the objectives and key guidelines set out in the Parramatta Road Corridor Fine Grain Study, September 2016 | The proposal would be consistent with the following objectives for character area 3 which apply to the site:<br>• preserve the eclectic mix of large industrial warehouses, scattered with terrace houses and low scale apartment buildings<br>• preserve the green pocket park at the termination of Johnstons Creek.<br><br>The fine grain study also includes an objective to preserve the predominant zero lot setbacks to reflect the existing warehouse character. The attached urban design report demonstrates the achievement of these |

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| | setbacks to maintain the industrial character and street-wall height.<br><br>The proposed design also meets the relevant key guidelines, by responding to :<br>• surrounding heritage items and heritage conservation areas<br>• the surrounding industrial character through built form, building articulation, and appropriate use of materials, and further refined through the site specific DCP. |
| Providing green and active streets that connect residents and workers to small, diverse, and highly connected local and regional open spaces | Consistent |
| Encouraging residential redevelopment in the Hordern Place industrial estate that addresses and enlivens O'Dea Reserve, and also delivers a new open space area for the Precinct's residents and workers | Not relevant |
| Capitalising on the improved, high-capacity public transport connections along Parramatta Road to the CBD | As discussed before. |
| Addressing the constraints of the north-south street blocks and limited east-west connections by requiring new development to deliver connections to the surrounding streets, work places and neighbourhoods | Consistent |
| Rehabilitating and greening the Johnston's Creek corridor to connect the Precinct to the Bicentennial Parklands and the harbour foreshore walks along the line of Johnston's Creek and its tributaries | Consistent |
| Providing activated streetscapes and improved public domain particularly on north-south streets to create new 'green fingers' | Consistent |
| Enhancing links to Petersham Station by focussing on north-south connectivity across Parramatta Road and along Railway Street | Not applicable |
| Reducing parking rates across the Precinct to capitalise on the strong public transport along Parramatta Road | Consistent |
| Incorporating car parking into future development to unlock existing car parks and repurposing them for open space. | Consistent |
| **Section 12.5: Open Space, Linkages and Connections and Public Domain** | |
| Green and embellish the currently underutilised land along Johnston's Creek to create a significant new regional green link | Consistent |

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| accommodating cycling and pedestrian links. | |
| Provide new public open space areas on larger sites to increase the overall quantum of local open space in the Precinct. | Not applicable |
| Break up long blocks and design new lanes and high quality pedestrian prioritised links that will form a fine grained network of connected urban spaces | Not applicable |
| Provide new and improved pedestrian links to improve permeability and provide additional north-south and east-west connections at Chester Street | This is being considered by Council through the Parramatta Road Urban Amenity Improvement Plan. |
| Provide new or upgraded cycling links to provide and improve connectivity and close missing gaps in the network, including along Johnston's Creek between Mathieson Street (Parramatta Road) and Booth Street | Consistent |
| Where possible, provide links that can accommodate both pedestrians and cyclists. | Consistent |
| Public Domain Requirement s as per the Corridor wide Guidelines | Consistent |
| **Section 12.6: Street Function and Precinct Transport** | |
| Any new streets are to be designed as Local Streets under the Street Function Hierarchy. | Consistent |
| Implement the specific objectives and recommendations of the Parramatta Road Corridor Precinct Transport Report, September 2016. | This has been discussed in the below tables. |
| Corridor wide Guidelines | Consistent |
| **Section 12.7: Fine Grain** | |
| Demonstrate consistency with the objectives and key guidelines for the relevant character area as set out in the Parramatta Road Corridor Fine Grain Study, September 2016. Character areas. | Consistent as discussed above |
| **Section 12.8 Green Edge Setbacks, Transitions and Activity and Commercial Zones** | |
| Maintain and reinforce zero lot setbacks to Parramatta Road and Pyrmont Bridge Road. A zero lot setback is not required where an Indicative Zone for Rapid Transit is identified. | Not applicable |
| Demonstrate consistency with the typical section for Parramatta Road illustrated in Figure 12.11. | Not applicable |
| Preserve the zero lot setbacks in the northern parts of the Precinct consistent with the Parramatta Road Corridor Fine Grain Study, September 2016. | Consistent |
| Upper level setbacks could be provided in the northern part of the Precinct and south of Parramatta Road in the Hordern Place | Consistent |

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| industrial estate so long as the predominant scale and street wall is preserved at the ground and first floors | |
| Provide setbacks consistent with Section 4 of the Guidelines in all other areas of the Precinct and Frame Area. | Consistent |
| Provide built form transitions to heritage items and heritage conservation areas consistent with Figure 12.9. | Consistent |
| Provide a built form transition consistent with Figure 12.10 to any new open space to ensure that at least 50% of the open space will receive a minimum of 3 hour direct solar access between 11am and 3pm on 21 June. | Not applicable |
| Provide appropriate built form transitions for all other new development consistent with consistent with the Parramatta Road Corridor Fine Grain Study, September 2016 to existing built form | Consistent |
| Active and Commercial Frontages are to be provided in the locations illustrated in Figure 12.8. | Not applicable. |
| New Through Site Links and Prioritised Pedestrian Links should be lined with Active Frontages. Adjacent to proposed open space areas, Active Frontages should reflect the function and purpose of the proposed open space. Sympathetic uses such as community facilities, child care centres and small kiosks/cafes should be explored. | Consistent |
| An Active Frontage can be replaced with a Commercial Frontage adjacent to a new Through Site Links, Prioritised Pedestrian Link or new open space area if Council forms the view that an appropriate use will be provided. | Consistent |
| The ground level of development along the full length of Parramatta Road must be a non-residential use. | Not applicable |
| Active and Commercial Frontages must also consider the objectives and key guidelines set out in the Parramatta Road Corridor Fine Grain Study, September 2016. | Consistent |
| The ground floor level of Active and Commercial Frontages is to match the street level. | Consistent |
| Provide consistent paving, street furniture, signage, planting and lighting along Active Frontages. | Consistent |
| **Section 12.9: Recommended Planning Controls** | |

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| Land use: Recommended land use for the site is R3 Medium Density Residential. | The proposed land use zoning is B7 Business Park with student housing as additional permitted use. The proposed student housing meets the wider land use objectives of the precinct. |
| Building Height: 17m or 4 storeys | Due to the topography of the site, the proposed 17m height control can accommodate up to 5 storeys (including a lower ground level). This is acceptable as the urban design report demonstrates through the visual impact assessment and view corridor lines that the proposal would not have adverse amenity impacts on the surrounding neighbourhood. |
| Density: Recommended maximum FSR for the site is 1.5:1 | The supporting urban design scheme demonstrates that the site has potential to accommodate additional density without resulting in adverse amenity impacts.<br><br>The additional density is considered necessary to incentivise the retention of employment uses on the site and support the visions of the Camperdown-Ultimo Collaboration Area Place Strategy and PRCUTS for the precinct. |

**Consistency with Implementation Plan 2016 - 2023**

The Implementation Plan establishes a sequencing strategy identifying areas of the Parramatta Road corridor to be redeveloped to prior to or after 2023. The site is the area for post 2023 development.

The Implementation Plan supports delivery of a maximum 105,000sqm of employment GFA within the areas identified for release by 2023, predominantly within a business development zone comprising light industrial, enterprise and business, commercial and community uses.

The Implementation Plan does not propose any residential floor space within the 2016-2023 timeframe. However, it is noted that page 256 of the PRCUTS Planning and Design Guideline forecasts 389 new dwellings by 2023 and 700 new dwellings by 2050. This appears to be an inconsistency within the PRCUTS Implementation Toolkit.

The Implementation Plan states that Proposals that depart from the identified staging and sequencing will need to be considered against its Out of Sequence Checklist. The Checklist is a merit assessment process of proposals that are not aligned with the Implementation Plan 2016 – 2023 stage should be allowed to proceed.

The requirements of the Out of Sequence Checklist have been addressed in detail in Appendix-A.

Rezoning of the site prior to 2023 is also considered appropriate on the basis that:

- the nature of the development means that it would not have significant infrastructure impacts;
- it has the potential to make a substantial contribution towards achieving the vision of PRCUTS, GSRP, ECDP and C-U CAPS for the precinct;
- the proposal has dealt with the challenge of loss of employment-zoned land by retaining the existing employment floor space and expanding employment opportunities for health and education uses to support the vision of Camperdown-Ultimo Collaboration Area;
- the proposed land dedication and active transport path that form part of the proposal will assist Council in the incremental delivery of a strategic green link (part of the Green-grid) as identified in Council's Integrated Transport plan, Camperdown Public domain masterplan and Parramatta Road UAIP; and
- the proposal has gone through a rigorous iterative design process with Inner West Council and the Inner West Local Planning Panel since 2017 to reach the stage where it now complies with the criteria of the Out of Sequence Checklist.

The PRCUTS Implementation Plan requires that rezoning does not proceed until a Precinct-wide traffic study has been prepared. This study should be completed by September 2020. The proposal demonstrates that it would not result in any increased traffic generation compared to the existing controls which apply to the site.

The proposal therefore has sufficient merit to proceed to Gateway with a recommendation that a Gateway condition be imposed to update the proposal based on the outcomes of Precinct-wide traffic and transport study prior to public exhibition.

**Consistency with Parramatta Road Corridor – Urban Amenity Improvement Program**

The Urban Amenity Improvement Program (UAIP) is a $198 million initiative to stimulate the transformation of the Parramatta Road Corridor. For the Camperdown Precinct the UAIP will fund the following infrastructure upgrades which will benefit the site:

- new north-south pedestrian and cycle connection along Johnstons Creek from Booth Street to Parramatta Road
- public domain improvements and cycle connection to Pyrmont Bridge Road between Parramatta Road and Mallet Street.

The identified works in the first point above are directly relevant works to this proposal as the site adjoins Johnstons Creek. The projectalso includes a:

- *Concrete shared path between Badu Park and Chester Street playground*
- *Lightweight cantilevered walkway over the existing channel between Chester Street playground and Mathieson Street.*

The proposed conceptual diagram as shown in the above figure envisages a landscaped edge along both sides of the stormwater channel. The proposed setback of 6m from the Johnstons Creek stormwater channel and works-in-kind will help Council deliver this vision.

The proposed setback of 3.5m I the proponent's latest design to the basement is insufficient to provide deep-soil landscape planting along the proposed through site-link as envisaged in the UAIP and Council's Camperdown Public domain masterplan. This has been discussed in detail in the urban design comments and an increased setback of 5m to the basement is now proposed to provide adequate landscaping along the pedestrian and cycling route. This will be a good contribution to the implementation of UAIP.

**Consistency with Infrastructure Schedule**

A prioritised and costed list of future infrastructure including open space, transport, traffic community, health and education facilities is required to support the long-term growth in the Corridor. PRCUTS Infrastructure schedule outlines the infrastructure required to support Camperdown precinct.

The proposal is supported by an Integrated Infrastructure Delivery Plan which considers the infrastructure requirements for meeting Criteria 2 of the Out of Sequence Checklist. This discussion can be found in Appendix - A.

**Consistency with PRCUTS Reference Reports**

- **Precinct Transport Report -** The proposal will be updated post-Gateway to ensure its consistency with the outcomes of DPIE/IWC precinct-wide traffic and transport study. This is unlikely to require any material change as the proposal has minimal infrastructure impacts.

- **Fine Grain Study –** The relevant principles have been discussed in the Planning and Design Guidelines section.
- **Social Infrastructure Analysis Report -** The additional social infrastructure required for the Camperdown Precinct as identified in the Social Infrastructure Analysis Report forms part of the PRCUTS Infrastructure Schedule. This report does not directly affect the subject site.
- **Sustainability Implementation Plan -** The proposal includes sustainability provisions which would exceed PRCUTS requirements.
- **Economic Analysis Report -** This report does not directly affect the subject site. This report forms basis of the land uses and development controls recommended in PRCUTS. Generally, the report emphasises making Camperdown a specialist precinct for health and education related uses because of its proximity to major institutional assets including RPA and USYD. The proposal is consistent with this vision.

### Strategic Merit Test Assessment Criteria

| Criteria | Assessment |
|---|---|
| **Does the proposal have strategic merit? Is it:** | |
| 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. | As outlined above, the Planning Proposal is consistent with the visions of GSRP 2018 and ECDP 2018.<br><br>The proposal is not entirely consistent with planning priority regarding industrial land management as it recognises that PRCUTS may be implemented with its recommended rezonings to be pursued despite the potential loss of industrial land in the corridor. PRCUTS recommends an R3 residential zoning (as shown on the PRCUTS zoning map) for the site and a maximum FSR of 1.5:1. The proposal also departs from the staging identified under the PRCUTS Implementation Plan 2016 – 2023.<br><br>These inconsistencies have been justified in the above section. Notwithstanding it is considered that the planning proposal would result in better outcomes than it would if it strictly complied with ECDP and PRCUTS. |
| Consistent with relevant local council strategy that has been endorsed by the Department | IWC LSPS and Housing Strategy were adopted in February 2020 but are yet to be endorsed by GSC/DPIE.<br><br>Nevertheless the proposal is consistent with these strategies and Council's Draft Employment and Retail Lands Strategy as discussed elsewhere in this report. |
| Responding to a change in circumstances, such as the investment in new infrastructure | This Planning Proposal is underpinned by PRCUTS, GSRP, ECDP and CU-CAPS |

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| or changing demographic trends that have not been recognised by existing planning controls | which identify the need to support and accommodate the growth of related health and education uses in this area.<br><br>The proposal is inconsistent with the delivery sequencing identified in PRCUTS as the site is 'Out of Sequence'. The proposal is accompanied by an Out of Sequence checklist to demonstrate that it can be delivered in advance of the expected timeline. This has been discussed in detail in the previous section that demonstrates consistency with PRCUTS.<br><br>It is acknowledged that PRCUTS is based on future infrastructure investments in the corridor and these infrastructure investments have not yet been committed by the State Government. However, the supporting documentation and external independent peer review undertaken by Council (as discussed throughout this proposal) establish that this type of development would result in negligible impact on the infrastructure due to the nature of its uses. |
| **Does the proposal have site-specific merit, having regard to the following:** | |
| The natural environment (including known significant values, resources or hazards) | The site is affected by a significant flood risk along the Johnstons Creek boundary. Supporting flood studies have been provided to establish the flood planning level. The proposed design addresses flooding and will also enhance the environmental value of Johnstons Creek. |
| The existing uses, approved uses, and likely future uses of land in the vicinity of the proposal | As discussed elsewhere in the report, the proposed land uses have merit based on the current strategic policy framework at local and State government level.<br><br>The building envelope controls as proposed in the supporting draft LDCP would ensure that the proposed built form has minimal adverse impacts on the adjoining properties. |
| 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. | It is not anticipated that the proposed density increase will create substantial additional demand for infrastructure and services at the site. An Integrated Infrastructure Delivery Plan has been prepared to support the planning proposal as required by the PRCUTS Out of Sequence Checklist. The proposal is accompanied by a Voluntary Planning Agreement offer letter to provide active transport infrastructure and monetary |

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| | contributions. Any other infrastructure and utility services requirements will be met at cost by the developer at the Development Application stage. |

**Q4. Will the planning proposal give effect to a council's endorsed local strategic planning statement, or another endorsed local strategy or strategic plan?**

- **Inner West Local Strategic Planning Statement**

IWC Local Strategic Planning Statement (LSPS) guides land use planning and development in the area to 2036 and provides the link between the Eastern City District Plan and priorities of Council's Community Strategic Plan. The LSPS was adopted by Council on 25 February 2020 and has been submitted to the GSC for consideration and endorsement. The planning proposal is consistent with the objectives and actions in the LSPS as discussed below:

| Planning Priority | Consistency |
|---|---|
| **Planning Priority 2 - Inner West is a zero emissions community**<br><br>Action 2.3 Update planning controls to improve the overall environmental performance of new buildings and precincts. This will include:<br><br>• Working with relevant stakeholders to develop planning controls to establish low-carbon, high performance precincts in the following locations:<br><br>• Camperdown-Ultimo Collaboration area<br><br>• Parramatta Road Corridor | **Consistent**<br><br>The planning proposal is committed to an innovative model of achieving a 4-star Green Building Council rating which exceeds the energy and water targets in PRCUTS. |
| **Planning Priority 3 - A diverse and increasing urban forest that connects habitats of flora and fauna**<br><br>Action 3.1 Maintain and increase the tree canopy and urban forest of Inner West and enhance biodiversity corridors | **Consistent**<br><br>The planning proposal provides opportunities to enhance the interface to and connectivity along Johnstons Creek through the provision of a 6m setback.<br><br>The proposed site-specific DCP includes design measures for a minimum deep-soil area to incorporate tree planting and landscaping along the Johnstons Creek corridor. |
| **Planning Priority 6 - Plan for high quality, accessible and sustainable housing growth in appropriate locations integrated with infrastructure provision and with respect for place, local character and heritage** | **Consistent**<br><br>The proposed site-specific DCP includes design measures to ensure that the proposal would provide appropriate |

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| **significance**<br><br>Action 6.1 Implement the Local Housing Strategy including protecting the heritage and character values of the Inner West | transitions to the adjoining heritage items and Annandale Heritage Conservation Area. |
| **Planning Priority 7 - Provide for a rich diversity of functional, safe and enjoyable urban spaces connected with and enhanced by their surroundings**<br><br>Action 7.1 Develop DCP controls that provide for a rich diversity of functional, safe and connected urban spaces | **Consistent**<br><br>The proposal would contribute towards the delivery of safe and connected place through the construction and dedication of a through-site link for pedestrians and cycling along Johnstons Creek corridor. |
| **Planning Priority 8 - Provide improved and accessible sustainable transport Infrastructure**<br><br>Action 8.1 Implement the Integrated Transport Strategy | **Consistent**<br><br>The proposal includes reduced car parking rates consistent with PRCUTS and sufficient bike parking to encourage use of active and public transport.<br><br>The prospered site-specific DCP includes controls to require the development to provide EV charging points to support future electric vehicle use. |
| **Planning Priority 9 - A thriving local economy**<br><br>Action 9.1 Implement the Employment and Retail Lands Strategy. This will include:<br><br>• Maintaining employment and productivity opportunities at Taverners Hill, Kings Bay and Camperdown | **Consistent**<br><br>The planning proposal includes a minimum of 980 sqm of non-residential floorspace for business, office and light industrial premises for the technology, bio-medical, arts, production and design sectors.<br><br>The proposal maintains employment opportunities on the site that would support the transition of Camperdown Precinct to a health and education precinct.<br><br>Further assessment of the proposal against the Employment and Retail Lands Strategy is provided in the section below. |
| **Planning Priority 13 - Develop diverse and strong stakeholder relationships to deliver positive planning outcomes**<br><br>Actions:<br><br><u>Camperdown-Ultimo Collaboration Area</u><br>c) Ensure place based planning guides the development of the Camperdown-Ultimo Collaboration area by undertaking the necessary studies to inform a master plan supporting | **Consistent**<br><br>The proposal is consistent with the visions for Camperdown Precinct in PRCUTS and the Camperdown-Ultimo Place Strategy, both of which support the transition of Camperdown to a world class health and education precinct.<br><br>The proposal achieves this vision because it: |

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| employment uses as the major focus, enabling the entire precinct to be a Low Carbon-High Performance precinct and establishing a biotechnology hub in Camperdown. This should include provision of public mass transit on dedicated lanes on Parramatta Road.<br><br>d) Prepare Inner West LEP and DCP provisions to enable affordable spaces for medical innovation and research, as well as health services and other supporting uses, and safeguard these activities from unrelated commercial uses<br><br><u>Parramatta Road Corridor</u><br>e) Finalise the housing, employment and transport strategies, and the Parramatta Road Corridor Transport Study, and prepare urban design / place based / open space studies to inform planning proposals to implement the Parramatta Road Corridor Urban Transformation Strategy: Implementation Plan 2016-2023 and Urban Amenity Improvement Plan, subject to the provision of public mass transit being provided on dedicated lanes on Parramatta Road | • Increases student accommodation;<br>• Maintains employment floor space that is complementary to the future Camperdown health and education precinct;<br>• Provides part of a pedestrian and cycling path along Johnstons Creek'<br>• Increases and the greening of the Johnstons Creek corridor;<br>• Reduces car parking rates to encourage active transport; and<br>• Delivers a 4 star Green Building Council rated development.<br><br>The proposed site-specific DCP includes design measures to help deliver residential uses above a large floorplate podium with a minimum of 4m floor to floor height in the employment floorspace to create an appropriate building typology for light industrial uses.<br><br>Council's Draft Employment and Retail Land Strategy (EaRLs) has recommended that innovative models for delivering affordable employment spaces to be explored. , This work has not commenced but given the long history of this proposal, it is considered unreasonable to wait for Council to develop an 'Affordable Employment Space' policy prior to deciding its position on this particular site<br><br>Nevertheless, the proposal creates new employment floor space that would support businesses and industries that correspond with the needs of the future health and education precinct. |

- **Inner West Housing Strategy**

Council's Housing Strategy was adopted in February 2020. It is a high-level strategy providing direction for the provision of housing for the area's growing communities and an evidence-base to inform Inner West LEP and DCP. Consistency against the relevant strategy actions is discussed below:

| **Planning Priority** | **Consistency** |
|---|---|
| Key relevant actions | **Consistent** |

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| • Continue to liaise with relevant stakeholders for the Camperdown Precinct and rezone accordingly to protect commercial functions and economic agglomeration opportunities<br><br>• Include the key dependency of improved mass transit on Parramatta Road (committed under Future Transport 2056 in the 0-10 year timeframe)<br><br>• Include in the implementation plan to prepare a place-based investigation to optimise the outcomes for the Camperdown Precinct<br><br>• Using the Eastern City District Plan Collaboration Plan framework, prepare supplementary studies including traffic and transport and a social infrastructure assessment<br><br>• Develop a local contributions framework. | The Local Housing Strategy identifies Camperdown precinct as one of the largest and most comprehensive health and education precincts in Greater Sydney.<br><br>It is understood that land in the northern part of the precinct is likely to accommodate biotech and similar industries to encourage collaboration and economic agglomeration.<br><br>From a housing perspective, there is a need to deliver housing options to attract the main users of the precinct, such as students, health workers and scientists to the wider area.<br><br>The proposal delivers student accommodation and employment uses in proximity to the future mass improved transit infrastructure along Parramatta Road, and provide opportunities to improve connectivity along Johnstons Creek. This supports the transition of Camperdown Precinct into a health and education precinct. |

- **Inner West Draft Employment and Retail Lands Strategy**

IWC's Draft Inner West Employment and Retail Lands Strategy (EaRLS) provides an evidence based approach to managing employment lands and commercial centres in the LGA. The strategy was exhibited between 23 September 2019 and 27 October 2019. Consistency with the objectives and actions of EaRLS is discussed below:

| **Table 1: Assessment of proposal against Council's draft EaRLS** | |
|---|---|
| **Strategy and Actions** | **Council Officer Comments** |
| ***Strategy 1.2:*** *Build on the existing and evolving roles and functions of employment precincts to strengthen the local economy* | **Consistent**<br><br>The proposed B7 Business Park zone continues to permit employment uses, including office and light industrial uses in the arts, technology, production and design sector, which responds to the evolving function of this existing industrial precinct.<br><br>The proposed student accommodation would provide potential housing opportunities for the key users of the Camperdown Precinct associated with university and health organisations. |

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| ***Strategy 1.5:*** *Support and encourage the establishment of new enterprises in the Inner West:*<br><br>***Action 1.5.4:*** *Support the growth of targeted industry sectors as outlined in the Eastern City District Plan, including: urban services, specialised food manufacturing ,logistics and other uses associated with the airport and Port Botany, the cultural and arts sector, night-time economies in appropriate centres, council depot/s and the establishment of an organic recycling centre, biotechnology and innovation industries in Camperdown.* | **Consistent**<br><br>Although the proposal rezones existing industrial and urban services land, the proposed B7 zoning will facilitate evolving employment uses and student accommodation which will support biotechnology and innovation industries in Camperdown. |
| ***Strategy 3.1:*** *Retain a diversity of industrial land, urban services land and employment generating uses* | **Consistent**<br><br>EaRLS demonstrates that there is a projected shortfall of employment floorspace in the Inner West. The proposal provides a minimum 980sqm of employment floor space for creative, technology, art, biomedical and production uses which are complementary to the vision of Camperdown as an innovation precinct.<br><br>The proposal retains the same amount of employment floorspace as currently exists on the site but the new floorspace will be able to accommodate a greater diversity of uses. |
| **Strategy 5.2**: Manage land use conflicts between employment land and residential uses<br><br>***Action 5.2.1:*** *Uses that are sensitive to impacts generated from noise, odour, dust, vibration, heavy vehicle traffic and/or 24 hours operation should not be permissible in industrial zones.*<br><br>***Action 5.2.3:*** *Investigate incorporating an additional local provision that would require new development to demonstrate compatibility with nearby industrial uses (see agent of change principle - Action 1.4.6).* | The proposed site specific DCP introduces controls that provide adequate separation between the proposed residential and non-resident uses to prevent future compatibility conflicts within the site or with neighbouring industrial sites. |

**Camperdown Precinct Public Domain Masterplan**

On 8 October 2019 Council adopted this Masterplan to start the implementation of the Parramatta Road Urban Amenity Improvement Plan for Camperdown. The Master Plan

seeks the creation of a shared path for pedestrians and cyclists, linking Badu Park and Booth Street to the north, with Parramatta Road to the south along the Johnstons Creek. The shared path is to be designed to maximise amenity and accessibility and will be planted with indigenous understorey species to maximise the ecology value of the corridor.

The site is in the Camperdown Precinct and Zone 1 for the proposed staging of works (See Figure 20).

The path will  be located in a linear reserve on the east bank of Johnstons Creek, provided as a setback to future developments or acquired by Council. The final alignment of this section of the route is yet to be determined and will be addressed in detail planning studies for the wider area.

Key elements include:

- A shared path for improved pedestrian and cyclist amenity
- Integration with Chester Street footbridge
- Utilisation of pedestrian access as part of the future development at 1-13 Parramatta Road
- Integration of a setback to the future building line on the east bank of the Creek to facilitate continuous connection
- Future detailed design to resolve issues of visibility, access and flooding

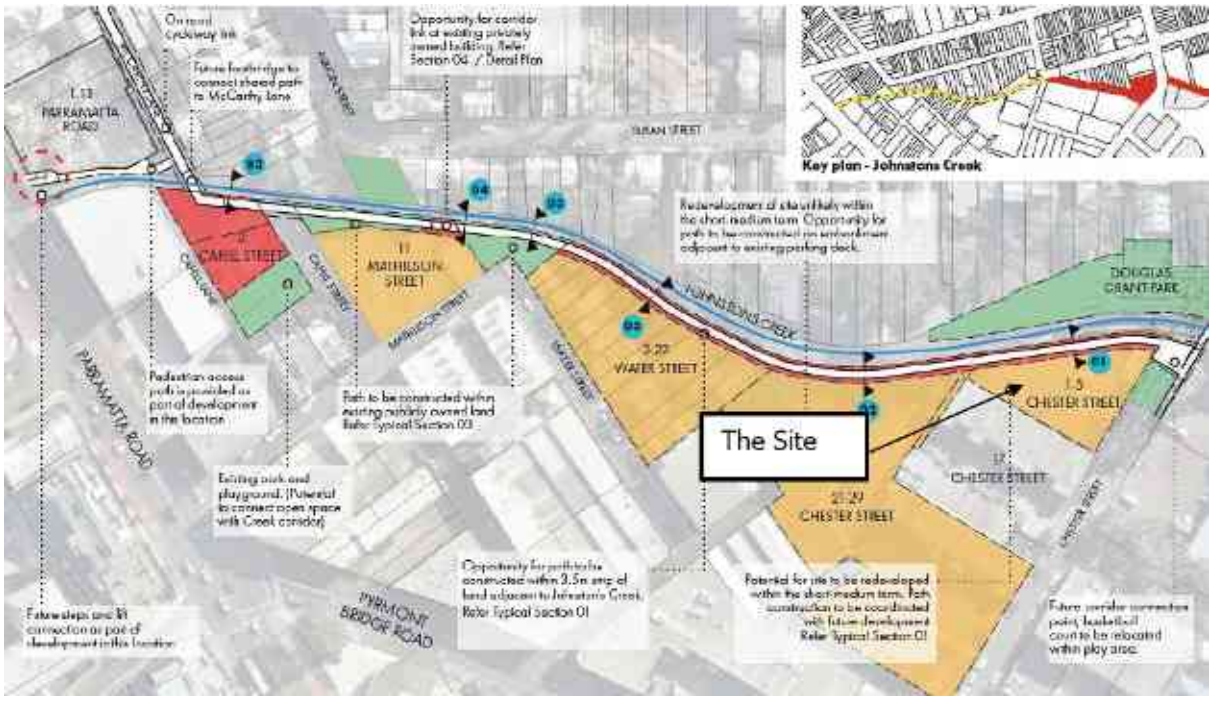


*Figure 21 - Extract from the Camperdown Public Domain masterplan indicating the proposed Johnstons creek pedestrian and cycling link*

The proposed path in this planning proposal to be delivered as a Works-in-Kind contribution is consistent with the Master Plan.

The planning proposal amends to make the path closer to the creek and be more consistent with this Masterplan. Themended plan and section are provided below:

*Figure 22: Proposed site plan showing the location of the through site link*

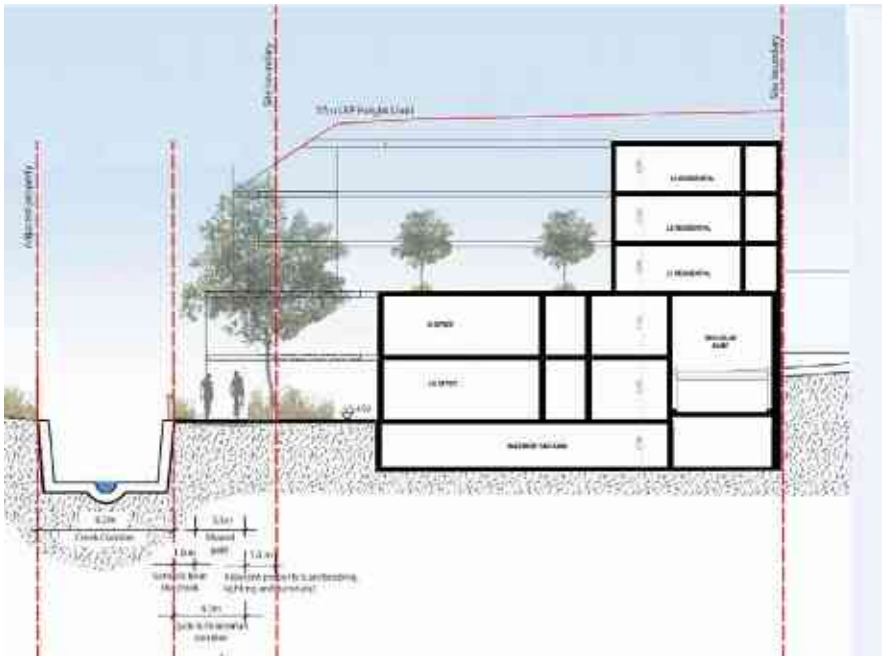

*Figure 23: Proposed section plan showing the location of the through site link*

It is recommended that the Gateway Determination has a condition that the urban design report be amended prior to public-exhibition to incorporate the above plan and section in detail.

**Q5. Is the planning proposal consistent with applicable State Environmental Planning Policies?**

The planning proposal is consistent with all relevant SEPPs and Regional Environmental Plans. Comments on relevant SEPPs are provided in the table below.

## Consistency with State Environmental Planning Policies

| State Environmental Planning Policy (SEPP) | Consistency/Comment |
|---|---|
| State Environmental Planning Policy No 55 – Remediation of Land | Consistent<br><br>The proponent has provided a Remediation Action Plan prepared by EI Australia dated July 2017 which concludes that the site can be made suitable for the proposed use including residential.<br><br>Should the proposal proceed to the Development Application stage, it is recommended that a detailed contamination report, site management plan, hazardous building survey be provided prior to any demolition or redevelopment.<br><br>The Planning Proposal does not contain any provisions that contravene the application of this SEPP. |
| State Environmental Planning Policy No 64 – Advertising and Signage | Consistent<br><br>The Planning Proposal does not contain any provisions that contravene the application of this SEPP. |
| State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development | Not applicable<br><br>SEPP 65 seeks to promote good design of apartments through the establishment of the Apartment Design Guide.<br><br>SEPP 65 does not apply to boarding houses. |
| State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes) | The Planning Proposal does not contain any provisions that contravene the application of this SEPP.<br><br>The proposal is for boarding house under the Affordable Rental Housing SEPP 2009 and is accompanied with letter of offer to make monetary contributions which can be used by Council for affordable housing. |
| State Environmental Planning Policy (Affordable Rental Housing) 2009 | Consistent<br><br>The Affordable Rental Housing SEPP aims to increase the supply and diversity of affordable rental and social housing in the state. |

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| | For boarding houses, it provides an FSR bonus of 0.5:1 where the existing maximum FSR is 2.5:1 or less.<br><br>The provisions in the SEPP for boarding houses do not apply to the proposed B7 zone. The proposed FSR control accommodates the de-facto potential for a bonus under the SEPP.<br><br>The Affordable Rental Housing SEPP (ARHSEPP) permits boarding houses as a form of affordable housing but does not include any provisions to require boarding house accommodation to be affordable. Council may have the power through the ARHSEPP to approve a boarding house development that proposes to create affordable housing but has no power to enforce affordable rents.<br><br>In the absence of appropriate mechanisms to ensure affordable rents for students, the proponent's offered monetary contributions though the VPA can be applied to delivery of affordable housing by Council in other places. |
| State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 | SEPP BASIX requires all future dwellings to achieve mandated levels of energy and water efficiency, as well as thermal comfort.<br><br>BASIX Certificates are included as part of future development applications to demonstrate compliance with SEPP BASIX requirements.<br><br>The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP. |
| SEPP (Exempt and Complying Development Codes) 2008 | The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP. |
| SEPP (Infrastructure) 2007 | The Planning Proposal does not contain provisions that contradict or hinder the application of this SEPP.<br><br>Should the Planning Proposal proceed, any future development must comply with the requirements of this SEPP. |
| State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 | The Planning Proposal does not contain provisions that contradict or hinder the |

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| | application of this SEPP. |

**Q6. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?**

Consistency with Ministerial Directions is discussed in the table below:

## Consistency with Ministerial Directions

| Direction | Consistency/Comment |
|---|---|
| 1. Employment and Resources | |
| 1.1 Business and Industrial Zones<br><br>**Objectives:**<br>The objectives of this direction are to:<br>a) Encourage employment growth in suitable locations;<br>b) Protect employment land in business and industrial zones; and<br>c) Support the viability of identified centres.<br><br>Clause (4) of Direction 1.1 includes what a relevant planning authority must do if this direction applies.<br><br>**What a relevant planning authority must do if this direction applies?**<br><br>(4) A planning proposal must:<br>a) Give effect to the objectives of this Direction;<br>b) Retain the areas and locations of existing businesses and industrial zones;<br>c) Not reduce the total potential floor space area for industrial uses in industrial zones; and<br>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.<br><br>Clause (5) of Direction 1.1 outlines when a planning proposal may be inconsistent with the terms of this directions as follows:<br><br>**Consistency**<br><br>(5) A planning proposal may be inconsistent with the terms of this direction only if the | The proposal is consistent with the objectives of this Direction as it intends to retain the existing employment floorspace on the site whilst permitting student accommodation.<br><br>Rezoning this IN2 Light Industrial zoned site to B7 will change but not reduce the supply employment servicing land in the LGA and sub-region.<br><br>The B7 Business Park has a site-specific provision for a minimum of 980 sqm of employment floorspace for light industries/ high technology industries and business uses associated with technology, bio-medical, arts, production and design sectors.<br><br>The proposal is technically inconsistent with 4(b) as it would reduce the potential industrial floor space. This is considered acceptable in the light of inconsistencies between this Direction and Ministerial Direction 7.3 in relation to implementation of Parramatta Road Corridor Urban Transformation Strategy which recommends rezoning of the site for purely residential uses.<br><br>As such, the proposal achieves an pragmatic solution to the inconsistencies between the two contradictory Directions by retaining its employment focus and allowing residential accommodation for students.<br><br>This proposal is supported by suite of studies including Economic Impact Assessment, Social Impact assessment, Urban Design report and Integrated |

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| 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:<br>a) justified by a strategy which:<br>i. gives consideration to the objective of this direction, and<br>ii. identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and<br>iii. is approved by the Secretary of the Department of Planning and Environment, or<br>b) justified by a study (prepared in support of the planning proposal) which gives consideration to the objective of this direction, or<br>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<br>d) of minor significance | Infrastructure Delivery Plan which demonstrate that the proposed uses have merit. The proposal is, therefore, consistent with 5(b) and has sufficient strategic merit to proceed to Gateway. |
| 1.2 Rural Zones | N/A |
| 1.3 Mining, Petroleum Production and Extractive Industries | N/A |
| 1.4 Oyster Aquaculture | N/A |
| 1.5 Rural Lands | N/A |
| 2. Environment and Heritage | |
| 2.1 Environmental Protection Zones | N/A |
| 2.2 Coastal Protection | N/A |
| 2.3 Heritage Conservation | Consistent<br><br>This direction requires a planning proposal to contain provisions which facilitate the protection of heritage items.<br><br>No heritage items are located within the site and the PRCUTS fine grain study does not identify any potential heritage items within the site.<br><br>The planning proposal sets height controls to respect heritage items and the transition to the adjoining conservation area.<br><br>A heritage study dated September 2017 The study concludes that the proposal is |

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| | appropriate in the context of the surrounding heritage values. The proposed design scheme has been further revised to improve the transition to the adjoining Heritage Conservation area and Chester Street.<br><br>View corridor lines have also been provided in the urban design report to assess the potential visual impact on the adjoining Annandale Heritage Conservation area. As such, the proposal is considered to be consistent with the objectives of this Direction. |
| 2.4 Recreational Vehicle Area | N/A |
| 2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs | N/A |
| 3. Housing, Infrastructure and Urban Development | |
| 3.1 Residential Zones | Consistent<br><br>The direction requires that a planning proposal relating to residential land must include provisions to:<br>• broaden the choice of building types and locations available in the housing market, and<br>• make more efficient use of existing infrastructure and services, and<br>• reduce the consumption of land for housing and associated urban development on the urban fringe, and<br>• be of good design.<br><br>The proposal will increase the choice of housing types in this area by providing student housing close to health and educational institutions.<br><br>There are concerns that the proposal would not result in genuine affordable housing outcomes as the boarding house use, even though delivered under the ARH2009 has no mechanism to enforce affordable rents for residents.<br><br>The proposal has been subject to a rigorous urban design process by proponent's designers, Council officers and external independent urban design peer review. If the proposal is supported, it |

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| | would go through further design review at the DA stage. |
| 3.2 Caravan Parks and Manufactured Home Estates | N/A |
| 3.3 Home Occupations | The Proposal does not contravene this direction. |
| 3.4 Integrating Land Use and Transport | Consistent<br><br>The direction requires the consideration of the principles of Integrating Land Use and Transport as outlined in key polies and guidelines.<br><br>The proposal would meet these principles because its future residents/employees would be in an area with good pedestrian and cycle connectivity close to a range of public transport services and key roads. |
| 3.5 Development Near Licensed Aerodromes | The site is partially within the 20 - 25 ANEF contour.<br><br>The Planning Proposal does not contravene this direction. |
| 3.6 Shooting Ranges | N/A |
| 3.7 Reduction in non-hosted short-term rental accommodation period | N/A |
| 4. Hazard and Risk | |
| 4.1 Acid Sulfate Soil | Consistent<br><br>The direction requires preparation of an acid sulfate soils study where it proposes an intensification of land uses on land identified as having a probability of containing acid sulfate soils.<br><br>LLEP 2013 identifies the site as having a probability of containing class 3 Acid Sulfate soils. The planning proposal is supported by a Phase 1 Remediation Action Plan which concludes that the site can be made suitable for residential purposes.<br><br>Accordingly, an acid sulphate soil study will be required to support the planning proposal following a Gateway decision.<br><br>Should the Planning Proposal be supported, it is recommended that a Gateway condition be imposed that requires the proposal to demonstrate consistency with this Direction. |

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| 4.2 Mine Subsidence and Unstable Land | N/A |
| 4.3 Flood Prone Land | Consistent<br><br>The direction applies when a planning proposal alters a zone or include a provision that affects flood prone land.<br><br>The site is in a flood prone area next to Johnstons Creek and has significant flooding issues.<br><br>Any proposed development must not increase the risk of flooding on the site or to other properties along the Creek line. It should also be designed to improve flood conveyance. A flood study has been prepared which demonstrates that this flood hazard can be managed through the adoption of appropriate flood mitigation measures as follows:<br><br>The proposed design is set back from the channel by 6 metres to retain the overbank flood flow capacity.<br>All floor levels for the new development must be at or above the Flood Planning Level (100 year ARI flood level plus 500mm freeboard) or RL 5.45. The proposed basement carpark must be designed to ensure all entries/accesses are located above the Probable Maximum Flood level.<br><br>A detailed Stormwater assessment is to be provided at the development application stage to ensure that the proposed design meets the requirements of the DCP relating to stormwater design and environmental initiatives. |
| 4.4 Planning for Bushfire Protection | N/A |
| 5. Regional Planning | |
| 5.1 Implementation of Regional Strategies | N/A |
| 5.2 Sydney Drinking Water Catchments | N/A |
| 5.3 Farmland of State and Regional Significance on the NSW Far North Coast | N/A |
| 5.4 Commercial and Retail Development along the Pacific Highway, North Coast | N/A |
| 5.5 Development in the vicinity of Ellalong, Paxton and Millfield (Cessnock LGA) (Revoked 18 June 2010) | N/A |
| 5.6 Sydney to Canberra Corridor (Revoked 10 July 2008. See amended Direction 5.1) | N/A |

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| 5.7 Central Coast (Revoked 10 July 2008. See amended Direction 5.1) | N/A |
| 5.8 Second Sydney Airport: Badgerys Creek (Revoked 20 August 2018) | N/A |
| 5.9 North West Rail Link Corridor Strategy | N/A |
| 5.10 Implementation of Regional Plans | |
| 5.11 Development of Aboriginal Land Council land | N/A |
| 6. Local Plan Making | |
| 6.1 Approval and Referral Requirements | N/A |
| 6.2 Reserving Land for Public Purposes | N/A |
| 6.3 Site Specific Provisions | Consistent<br><br>The objective of Ministerial Direction 6.3 "is to discourage unnecessarily restrictive site specific planning controls".<br><br>The planning proposal includes site-specific provision to facilitate a development that is consistent with the following objectives of the B7 Business Park zone:<br><br>• *To provide a range of office and light industrial uses.*<br>• *To encourage employment opportunities.*<br>• *To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.*<br>• *To provide for limited residential development in conjunction with permissible active ground floor uses.*<br>• *To provide for certain business and office premises and light industries in the arts, technology, production and design sectors.* |
| 7. Metropolitan Planning | |
| 7.1 Implementation of the Metropolitan Plan | This direction requires planning proposals to be consistent with A Plan for Growing Sydney. A Plan for Growing Sydney has been superseded by the Greater Sydney Region Plan in March 2018.<br><br>The proposal is consistent with The Region Plan as outlined in Section B. |
| 7.2 Implementation of Greater Macarthur Land Release Investigation | N/A |
| 7.3 Parramatta Road Corridor Urban Transformation Strategy<br><br>**Objectives** | Compliance with PRCUTS has been discussed in the previous section on this Strategy. |

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| (1) The objectives of this Direction are to:<br>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,<br>b) provide a diversity of jobs and housing to meet the needs of a broad cross - section of the community, and<br>c) guide the incremental transformation of the Parramatta Road Corridor in line with the delivery of necessary infrastructure.<br><br>Clause (4) of Direction includes what a relevant planning authority must do if this direction applies.<br><br>**What a relevant planning authority must do if this Direction applies**<br>(4) A planning proposal that applies to land within the Parramatta Road Corridor must:<br>a) give effect to the objectives of this Direction,<br>b) be consistent with the Strategic Actions within the Parramatta Road Corridor Urban Transformation Strategy (November, 2016),<br>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,<br>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),<br>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)<br>f) be consistent with the relevant District Plan. | Superficially, the proposal is inconsistent with the PRCUTS recommended zoning control, maximum floor space ratio and the Implementation Plan's staging sequence.<br><br>The proposal is however consistent with the objectives of this Direction (Clause 4a of the Direction) as it would:<br>• facilitate development within the Camperdown precinct in the Parramatta Road Corridor and achieve better outcomes than envisaged in the Strategy<br>• provide a diversity of jobs and housing to meet the needs of changing demographics. Provision for employment uses and student housing is a better outcome than rezoning the site to purely residential uses.<br>• contribute towards the provision of active transport infrastructure along Johnstons Creek<br>• set a precedent for beginning the transformation in the Corridor as it would be the first planning proposal to proceed since the Strategy was endorsed in 2016.<br><br>The proposal comes in advance of delivery of necessary State infrastructure in the corridor to improve public transport. The proposal will however make a local active infrastructure contribution along Johnstons Creek which will be a substantial environmental benefit.<br><br>The proposal is consistent with the Strategic Actions in PRCUTS required by 4(b) as it would prioritise the Camperdown Precinct for biotechnology and employment uses that support the growth of the nearby institutions and provide student accommodation.<br><br>The proposal is inconsistent with 4(c) as it exceeds the maximum floor space ratio recommended in PRCUTS. This inconsistency has been justified using the urban design report prepared by the urban design consultants and independent urban design peer review commissioned by |

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| Clause (5) of Direction outlines when a planning proposal may be inconsistent with the terms of this directions as follows:<br><br>**Consistency**<br>(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:<br>a) consistent with the Out of Sequence Checklist in the Parramatta Road Corridor Implementation Plan 2016 – 2023 (November, 2016), or<br>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<br>c) of minor significance. | Council.<br><br>The proposal is inconsistent with the thresholds for land use change identified in the Parramatta Road Corridor Implementation Plan 2016 – 2023 under 4(d). An Out of Sequence checklist (as required by 5(a)) accompanies the proposal to demonstrate that the proposal has sufficient merit to proceed to Gateway and come forward as an out of sequence development<br><br>The site is adequately serviced in the current context as required by 4(e). Notwithstanding this, it is recommended that the proposal be updated Post-Gateway after the completion of DPIE/Council Precinct Transport study in September 2020.<br><br>The proposal is consistent with the District Plan as required by 4(f) as discussed previously.<br><br>It is acknowledged that components of the proposal are inconsistent with some recommendations of PRCUTS, but overall achieves a better outcome that still achieves PRCUTS objectives for the precinct.<br><br>The proposal is accompanied with urban design reports, Out of sequence checklist, traffic report, Integrated Infrastructure Delivery Plan to justify these inconsistencies and establish that the proposal has merit to proceed to Gateway. |
| 7.4 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan | N/A |
| 7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan | N/A |
| 7.6 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan | N/A |
| 7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor | N/A |
| 7.8 Implementation of Western Sydney Aerotropolis Interim Land Use and Infrastructure Implementation Plan | N/A |

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| 7.9 Implementation of Bayside West Precincts 2036 Plan | N/A |
| 7.10 Implementation of Planning Principles for the Cooks Cove Precinct | N/A |

## Section C – Environmental, social and economic impact

**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?**

The site has no vegetation and is used for industrial purposes, so is unlikely to affect critical habitat or threatened species.

There are several trees and other vegetation on the boundary of the subject property with Johnstons Creek which contribute to the green corridor. The proponent's concept design provides a 6m setback for landscaping at ground level on the creek boundary.

**Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?**

The planning proposal has been developed to ensure urban design, massing, heritage and overshadowing issues are both addressed and any adverse effects mitigated. This follows a rigorous urban design process involving the proponent's urban designers - DKO Architecture, Council officers and Architectus, who were Council's commissioned independent urban designers. The supporting urban design report and peer review are attached to this planning proposal.

The potential environmental effects of this proposal are discussed below:

Visual and privacy impact

As discussed in the urban design section, the proposed development with an FSR 2:1 and a building height of 5 storeys is a good design response to the surrounding area. The proposed L-shaped building layout, would present as a predominantly 2 storey street wall frontage to Johnstons Creek corridor, with those sections of the building up to 5 storeys set further away from the Creek within the 17m height limit recommended in PRCUTS.

The proposed building separation of 33 - 45 m (including 6m site setback from Johnstons creek boundary) to the residential dwellings to the north is appropriate and exceeds the minimum separation distances required by the Apartment Design Guide (ADG). Overall, the scheme has been sensitively designed to minimise visual impact on the dwellings to the north of the site.

The proponent has proposed a podium communal open space overlooking Johnstons Creek and Douglas Grant Memorial Park. This proposed space is appropriately separated from the residential dwellings to the north although there may be some minor overlooking impacts, on the private open space of these dwellings. These can be managed through appropriate fence/ material finishes at the DA stage.

A zero metre setback has been proposed for the southern boundary of the site adjoining 17 Chester Street. It is assumed that no windows/opening would be provided on this boundary wall to ensure the redevelopment potential of the adjoining site is retained.

The proposed zero metre setback to the ground and first floor and 3m setback to the upper storeys along Chester Street is sufficient and would not result in adverse visual privacy impacts on the proposed rear extension of Kennards Storage.

Overshadowing

There are no significant overshadowing impacts from the proposed redevelopment. The urban design peer reviewers, Architectus, undertook a preliminary overshadowing analysis of the proposed building layout to its neighbour on the south at 17 Chester Street, Annandale. The indicative design for the potential redevelopment of the neighbouring site shows that both the sites would be able to redevelop and achieve ADG requirements if necessary.

It is recommended that DKO Architecture's design report be amended Post-Gateway and pre-exhibition to provide a detailed solar and shadowing analysis.

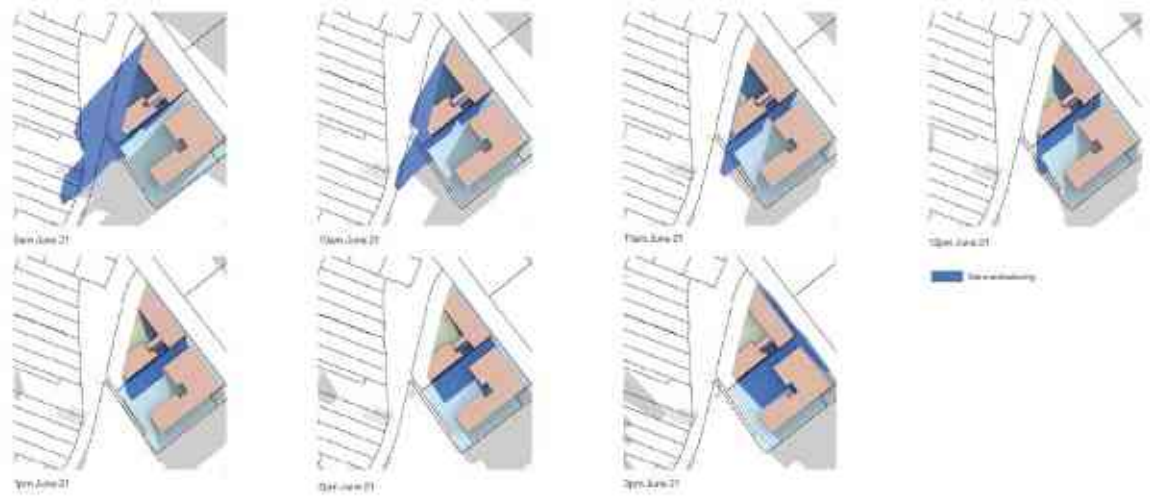

*Figure 24: Solar and shadowing analysis – DKO Architecture*

Acoustic impacts

An acoustic assessment has been carried out by West and Associates (September 2017). It considers the potential noise impacts associated with nearby traffic, surrounding existing commercial use, potential industrial uses and aircrafts.

The assessment determines that with the existing usage of the surrounding area the monitored district noise levels requirements are well within typical acceptable residential development levels. The assessment concludes that any potential adverse noise impacts can be mitigated through suitable construction and window attenuation measures at Development Application stage.

The site-specific DCP contains also measures to mitigate any acoustic transmission by insulating residential use from employment uses on site and from neighbouring industrial sites.

Flooding and Stormwater Management

The site is identified as a flood control lot on the Flood Control map in Leichhardt DCP 2013.

A Flooding and Stormwater Management Report has been prepared for the planning proposal by Sparks and Partners Consulting Engineers (July 2017). The report identified the

site is subject to a Flood Planning Level of RL5.450 AHD (100 year ARI flood level plus 500mm freeboard) and a Probable Maximum Flood Level of RL8.400 AHD.

The Leichhardt DCP outlines the relevant controls with respect to flood control lots and flood prone land. The assessment of the site's capacity to achieve these controls is summarised below.

| **Leichhardt DCP control (multi-unit residential)** | **Consideration** |
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| All floor levels to be at or above the Flood Planning Level (FPL) | The FPL for the site based on the Draft Leichhardt Flood Study (November 2014 prepared by Cardno) is RL5.450 AHD (100yr flood level plus 500mm freeboard).<br><br>The current site levels indicate the site has an average level of RL7.800 AHD. Therefore, any future development application would have to achieve this requirement, within its final design. |
| Basement (below natural ground level) car parking must have all access and potential water entry points above the Probable Maximum Flood Level or Flood Planning Level whichever is the higher, and a clearly signposted flood free pedestrian evacuation route from the basement area separate to the vehicular access ramps. | The Probable Maximum Flood Level for the site based on the Draft Leichhardt Flood Study (November 2014 prepared by Cardno) is RL8.400 AHD. Current site levels indicate that this can be achieved with the south-eastern corner of the site being at RL8.500 AHD. Therefore, any future development application will be able to achieve this requirement, subject to development of a final design. |

The Flooding and Stormwater Management Report highlighted that proposed amendments to the Leichhardt LEP would not change the applicable controls within the Leichhardt DCP relating to stormwater quantity and stormwater quality. It notes that:

- on site detention will need to be provided to meet both Council and Sydney Water requirements, and
- stormwater filtration/treatment measures would be required to meet the relevant Council water quality criteria and may include a filtration basket or similar device to complete the treatment train system.

The site-specific draft LDCP includes controls to require that car entry to the site be above the flood planning level. In addition, the proposed 6m setback to Johnstons Creek channel will create sufficient overbank flood flow capacity.

A detailed stormwater assessment would be provided at the development application stage to ensure that the proposed design meets DCP requirements for stormwater design and environmental initiatives.

Heritage Impact Statement

An updated Heritage Impact Statement has been prepared by Architectural Projects (September 2017) to support the planning proposal.

The Statement identifies that the site itself is not subject to a heritage listing or heritage conservation area (see Figure 25), but is located in the vicinity of the following:

- sandstone kerb and guttering, Chester Street, listed as a local heritage item
- warehouse including interiors at 52-54 Pyrmont Bridge Road (corner Guihen and Chester St), listed as a local heritage item
- Johnstons Creek stormwater channel which is in part listed as a local heritage item, although not adjacent to the site, and
- Annandale Heritage Conservation Area

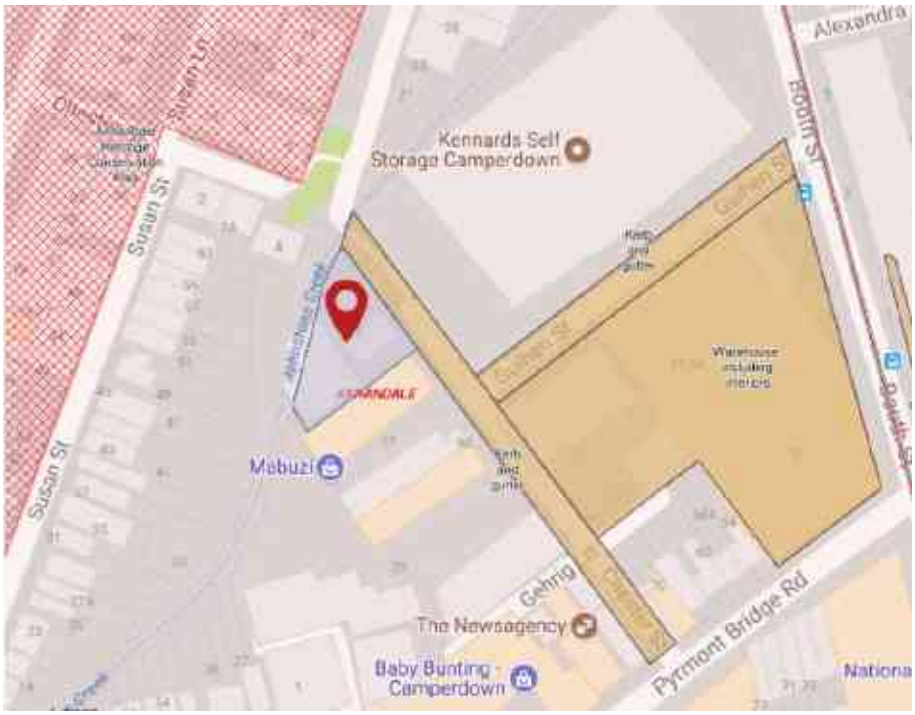


*Figure 25: Map of surrounding heritage items and heritage conservation area*

The PRCUTS – Fine Grain Study establishes the following objectives relevant to heritage conservation:

- ensure that development in the vicinity of heritage items is designed and sited to protect the heritage significance of the item
- new development of sites in the vicinity of a heritage item are to be designed to respect and complement the heritage item in terms of the building envelope, proportions, materials, colours and finishes, and building and street alignment
- development in the vicinity of a heritage item is to minimise the impact on the setting of the item, and
- preserve the eclectic mix of large industrial warehouses, scattered with terrace houses and low scale apartment buildings.

The Heritage Impact Statement concludes that the planning proposal is an appropriate response to the character of the immediate industrial area and the heritage significance of Johnstons Creek and the Annandale Conservation Area.

In particular it noted that the proposal responds to the surrounding heritage context by:

- retention of the kerbing and guttering of Chester Street

- street alignment consistent with existing industrial buildings
- masonry wall character
- compliance with the 17m height limit as recommended in PRCUTS
- proposed articulation of facades and use of repetitive window treatment
- setbacks to the upper storeys along Chester Street, and
- a 6m setback to Johnstons Creek boundary

This Heritage Impact statement was prepared for the original planning proposal design and has been improved to reflect Architectus's recommendations. If the proposal proceeds to Gateway, it is recommended that the Heritage Impact Statement be updated.

The final design scheme provides a better transition to the Annandale Heritage Conservation Area as it alters the building layout to reduce the bulk and scale along Johnstons Creek.

These aspects of the proposal are also reflected in the built form objectives and controls in the draft site specific DCP to ensure their implementation at the detailed design stage.

Contamination

A Remedial Action Plan has been prepared by Corvas Pty Ltd (July 2017) to guide remediation works to make the site suitable for the proposed residential land use. The Plan followed on from a Preliminary Site Investigation (Aargus 2017) which identified a number of areas of potential environmental concern at the site, including the presence of an underground storage tank, potential hydrocarbon impact on groundwater, and asbestos in soils.

The Remedial Action Plan outlines a methodology for remediation of the site to make it suitable for the proposed uses including the following remediation options:

- decommissioning and removal of the underground storage tank
- remedial excavation of hydrocarbon contaminated soils and asbestos impacted soils
- waste classification and off-site disposal of spoils from remedial excavation and from bulk excavations, and
- use of on-site bioremediation, in-situ treatment, cap and containment and / or monitored natural attenuation as contingency measures for residual contamination, if required.

Should the proposal proceed to the Development Application stage, it is recommended that detailed contamination report, site management plan, hazardous building survey be provided prior to any demolition or redevelopment.

Traffic and car parking

Traffic and Parking Assessment has been prepared by Varga Traffic Planning to inform the planning proposal.

The traffic study estimates that the proposal would generate 12 vehicle trips per hour during the commuter peak periods. The study also estimates that the existing controls for the site could allow a development of 1,000sqm of industrial / creative office floor space which would generate 13 vehicle trips hour during the AM and PM commuter peak periods. Accordingly, the proposal would result in a slight net reduction of one vehicle trip per hour in the traffic generating potential of the site. On this basis, the proposal would not result in any impact on the road network capacity, and no road infrastructure upgrades would be required.

Notwithstanding these findings, a SIDRA modelling analysis was used to determine the traffic impacts of the proposal which assumed that all project traffic flows from the development would be additional to existing flows. This is based on the existing situation and does not take into account the projected cumulative level of growth in PRCUTS to determine future flows. This is to be updated following the completion of DPIE/Council precinct-wide traffic and transport study by September 2020.

Varga Traffic Planning's traffic modelling found that the level of service of the surrounding intersections at Pyrmont Bridge Road / Chester Street and Booth Street / Guihen Street would not be reduced as result of the proposal and would continue to operate at a level of service A. The proposal would result an increase in average vehicle delays of less than 1 second per vehicle at the Pyrmont Bridge Road/ Chester Street intersection, and a zero increase in average vehicle delay at Booth Street/ Guihen Street. The traffic study concludes that the proposal would not have any unacceptable traffic implications on the local road network.

The traffic study considered the car parking requirements of a number the LDCP, PRCUTS and the ARHSEPP. These rates are identified in the table below.

| Regulation | Land use | Car parking rates | |
|---|---|---|---|
| **Leichhardt DCP** | Studio | Minimum 0 per dwelling | Maximum 0.5 per dwelling |
| | Visitors | Minimum 1 space per 11 dwellings | Maximum 0.125 spaces per dwelling |
| | Industry | Minimum 1 space per 250sqm | Maximum 1 space per 150sqm |
| | Warehouse | Minimum 1 space per 300sqm | Maximum 1 space per 250sqm |
| | Office | Minimum 1 space per 100sqm | Maximum 1 space per 80sqm |
| | Boarding house | 1 space per resident employee and 0.5 space per boarding room | |
| **PRCUTS** | Studio | Nil per dwelling maximum | |
| | Visitors | Nil | |
| | Commercial/Industrial | Maximum 1 per 150sqm | |
| **ARH SEPP** | Boarding house room | 0.5 per boarding room | |
| | | Not more than 1 per person employed in connection of the development who is a resident on the site | |

The traffic study also includes an analysis of existing student accommodation developments close to tertiary education establishments, which identified nine developments with a zero car parking rate. Advice was also sought from student housing provider UniLodge which confirmed that it would not anticipate any demand for car and motorbike parking with the proposal given its proximity to universities and public transport. UniLodge also highlighted a number of student housing development across its portfolio which do not provide car parking for students. This advice is included in an annexure to the traffic study.

Based on the above the traffic study Council officers have recommended that a zero car parking rate be adopted for the student housing, and that a maximum of 1 space per 150

sqm be adopted for the non-residential uses consistent with PRCUTS. 1 car parking space has been proposed for the student housing caretaker. Additional car-sharing spots are recommended in the DCP to support car share and reduce reliance on private car usage.

It is also recommended that PRCUTS bike parking and end of trip facilities rates be stipulated for students and employees in the draft site-specific LDCP to promote active transport. The draft site-specific LDCP also stipulates the provision of electric vehicle charging for the employee car parking to support Council's and PRCUTS sustainability initiatives

Council's transport officers have confirmed that the proposed development by virtue of its use (student housing) does not warrant any significant traffic concerns. 0 car parking spaces for student housing are proposed which will encourage the use of active and public transport.

PRCUTS requires that prior to any rezoning commencing, a precinct-wide traffic and transport study be completed. This should  be completed by September 2020. It's not anticipated that the proposal itself would result in unacceptable traffic impacts by virtue of its use and size, however, there are concerns regarding cumulative impacts along the corridor if more extensive redevelopment were to proceed on an ad-hoc basis without completion of transport study and necessary infrastructure being provided to support the growth.

The planning proposal process and traffic study can proceed concurrently giving the expected completion date for  the transport study. It is requested that a Gateway condition be imposed to update the planning proposal based on the outputs of the Precinct Transport report to ensure alignment with the implementation of PRCUTS.

Overall, the planning proposal aims to minimise private car dependency and encourages use of active and public transport.

**Q9. Has the planning proposal adequately addressed any social and economic effects?**

This planning proposal is likely to have positive economic effects by encouraging the revitalisation of the site and supporting key industry sectors including education, health and cultural uses.

**Social Impact Assessment**

Cred Consulting have prepared a revised Social Impact and Affordable Housing Assessment (April 2019) which considered the implications of the proposal to redevelop the site for approximately 83 boarding house rooms and 1,000 sqm of creative office / industrial development. The proposal has been amended since April 2019 to reduced density and the number of boarding house rooms.

The assessment highlighted that the boarding house component would accommodate university students, and would be managed by a specialist student housing operator, governed by a management plan.

The assessment highlighted that the site is close to Sydney University with 21 other community facilities and services (within 800 metres). The proposal will not generate the need for new community facilities or services, or additional open space. However, as it is part of the PRCUTS area it will contribute to the cumulative future demand for additional

social infrastructure and open space. The proposal will also generate demand for new open space and will require improved connectivity from the site to existing local parks and green spaces along the Johnstons Creek.

The assessment concluded that these impacts can be managed through the provision of contributions toward social infrastructure provision as outlined in the Integrated Infrastructure Delivery Plan for Kennard's site.

The assessment also identified a number of positive social impacts associated with the proposal including:

- provision of the entire residential component as a form of affordable housing,
- replacement of the four existing jobs on site and the potential for 65-98 jobs in creative industries, health and education, and
- improved passive surveillance and safety through increased street activation and an improved interface with Johnstons Creek.

The Assessment highlighted that, in addition to these positive social impacts, the following key public benefits would be achieved:

- beautification of the public domain, in particular, at the interface with Johnstons Creek
- improved lighting around the site for enhanced safety at night
- local and regional infrastructure contributions toward social infrastructure upgrades including open space as per the Leichhardt local infrastructure contributions plan.

There are concerns regarding Cred's claims that the proposal contributes towards 100% affordable housing as discussed previously. Notwithstanding the proposed student housing is considered to have a positive social impact by supporting the surrounding health and educational institutions. The monetary contributions proposed as part of the Voluntary Planning Agreement offer letter can be used by Council for the provision of affordable housing elsewhere.

**Economic Impact Assessment**

A revised Economic Impact Assessment of the proposal was prepared by AEC (April 2019). The assessment considered the economic impact of a base case being the retention of the existing Leichhardt LEP controls within the Camperdown Precinct against implementation of the planning controls recommended by PRCUTS for the whole Precinct.

The implementation case is projected to result in an additional contribution to the Inner West LGA economy of $51.4 million in gross regional product (GRP) and 360 full time equivalent jobs (FTE) in 2023 compared to what is expected under the base case. This represents the projected net increase in economic activity achieved by amending the planning controls for the precinct by 2023.

Projections to 2050 indicate amendment of the planning controls as per the implementation case could result in a net increase of $405.8 million in GRP and 2,875 FTE jobs by 2050 compared to the base case.

The modelling conducted indicates the implementation of the PRCUTS will result in a significant contribution through the ongoing activities of employment and businesses in the

Camperdown Precinct. The study also highlighted that the proposed non-residential uses on the site will respond to market demand for more intensive employment uses.

Council has identified that the PRCUTS employment projections are substantially overestimated. There are doubts that the proposed PRCUTS employment growth could be achieved. These projections are currently being reviewed by Council through the Employment and Retail Lands Strategy and Camperdown Innovative Precinct Land USE and Strategic Employment Study.

Notwithstanding this, the proposal would make a positive contribution towards achieving the vision of the Camperdown-Ultimo Collaboration Area by supporting key industry sectors including biotechnology, education, health and cultural uses. The site's proximity to Sydney CBD and Camperdown-Ultimo education and health facilities makes it an important location for employment growth supported by appropriate forms of residential development.

On balance, the economic impact of the proposal should be a net positive.

**Q10. Is there adequate public infrastructure for the planning proposal?**

NSW Government's PRCUTS and Future Transport 2056 outline initiatives for high frequency public transport investment in the form of rapid bus transit along Parramatta Road from Burwood to the Sydney CBD. The proposal is close to the future indicative superstop as indicated in PRCUTS Planning and Design Guidelines.

The existing public infrastructure servicing the site is adequate. Student housing is expected to have a significantly lower demand for open space and community facilities compared with a mainstream residential option as it provides on-site communal facilities for recreation, dining and study. Students also tend to access the extensive open space, recreation and facilities provided on campus.

The proposal will provide part of a strategic  walking and cycling path as a significant contribution towards open space and recreation for wider community.

Negotiations with the proponent regarding satisfactory infrastructure contributions will be completed to respond to any satisfactory arrangement condition in a Gateway Determination.

**Q11. What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?**

The proponent consulted the following key State Government agencies prior to the preparation of this planning proposal:

- NSW Department of Planning, Industry and Environment (DPIE);
- Transport for NSW (TfNSW) / Roads and Maritime Services (RMS);
- Sydney Local Health District;
- NSW Department of Industry ;
- NSW Department of Education;
  Sydney Water.

Sydney Local Health District, TfNSW, Department of Primary Industries, Department of Education did not raise any specific concerns.

The resultant correspondence from public authorities is attached with the stakeholder consultation report prepared by File Planning and Ethos Urban. The public authority consultation was primarily undertaken for the original planning proposal which involved residential development. The proponent has updated his stakeholder engagement report to provide feedback from the community. The current design scheme/proposed land uses have not yet been commented upon by the above-listed public authorities.

Sydney Local Health District, TfNSW, Department of Primary Industries, Department of Education have not raised any specific concerns.

DPIE/RMS objected to the original proposal on the basis that a precinct-wide traffic study had not been completed. The minimal infrastructure impacts that would arise from this proposal means it should proceed to Gateway with the premise that a condition be imposed in a Gateway Determination that the proposal be updated prior to any public exhibition.

The Gateway Determination will advise which public authorities should be consulted as part of the planning proposal exhibition process. Any issues raised will be incorporated into this planning proposal following consultation in the public exhibition period.

## Part 4 – Mapping

Mapping of the proposed changes to the LLEP 2013 will be prepared to support the exhibition of the proposal following a Gateway decision.

## Part 5 – Community consultation

Pre-consultation has been undertaken by the proponent as required by the PRCUTS Out of Sequence checklist. This has been discussed in the Council report, Out of Sequence checklist assessment and the submissions report prepared by Council officers.

If the proposal is supported, formal stakeholder and community consultation will be undertaken by Council in accordance with the legislative requirements and any additional conditions as imposed in a Gateway Determination.

## Part 6 – Project timeline

In accordance with the requirements set out in 'A guide to preparing planning proposals', the table below outlines the anticipated project timeline of the planning proposal progress through the LEP plan making process.

| Planning Proposal Stage | Date |
|---|---|
| Inner West Local Planning Panel considers the Planning Proposal | March 2020 |
| Inner West Council considers the Planning Proposal | April 2020 |
| Inner West Council submits the Planning Proposal to Department of Planning, Industry and Environment subject to any amendments required by Council Resolution. | May 2020 |
| DPIE assesses the Planning Proposal and issues Gateway Determination | May – September 2020 |
| Public exhibition of the Planning proposal | October 2020 |
| Consideration of submissions and preparation of updates to Planning Proposal. | October – December 2020 |
| Report to Council on post-exhibition outcomes and seek resolution to submit Planning Proposal to DPIE for finalisation. | February 2021 |
| Final review by DPIE, Parliamentary Counsel drafts LEP, and notification of the LEP by DPIE. | February – April 2021 |

## APPENDIX A - PRCUTS IMPLEMENTATION PLAN OUT OF SEQUENCE COMPLIANCE TABLE

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

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

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

The below table provides a detailed assessment how the planning proposal fares against the Checklist criteria.

| | **Out of Sequence Checklist analysis** |
|---|---|
| **Criteria 1 - Strategic objectives land use and development** | *1. The planning proposal can demonstrate significant delivery or contribution towards the Strategy's Corridor wide and Precinct specific vision.* |
| | The proposal is inconsistent with the PRCUTS recommended R3 Medium density residential zoning and instead, seeks a B7 Business Park zone for the site. As discussed in the Planning Proposal, the proposed creative employment uses and student accommodation are supported as these would contribute to the Camperdown precinct's desired future character, future proof the precinct for long term strategic bio-hub related land uses and provide student housing.<br><br>A 6m wide setback to Johnstons Creek is proposed to be dedicated to Council to provide pedestrian and cycleway delivered as works-in-kind by the proponent. The through site-link is a critical part of the recreational corridor along Johnstons Creek. As such, the proposal demonstrates that it can significantly contribute towards not just PRCUTS vision but also Greater Sydney Commission's Greater Sydney Region Plan, Eastern City District Plan and Camperdown-Ultimo Collaboration Area Place Strategy. |
| | ***2.*** *The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfils the relevant Strategic Actions for each Principle.* |
| | The planning proposal includes discussion to demonstrate consistency against all the PRCUTS corridor wide and precinct specific visions:<br><br>• *Housing choice and affordability*<br>• *Diverse and resilient economy*<br>• *Accessible and connected*<br>• *Vibrant Communities and Places*<br>• *Green spaces and links*<br>• *Sustainability and resilience* |
| | *3. The planning proposal can demonstrate significant net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located.* |
| | The proposal can demonstrate significant 'net community, economic and environmental benefits' as it would:<br><br>• contribute towards economic productivity by supporting creative, technology, art, biomedical and production sectors;<br>• provide accommodation for students in close proximity to health and educational institutions; and |

**Criteria 1 - Strategic objectives land use and development**

- provide significant environmental benefits as by delivering a part of the pedestrian and cycling link along Johnstons creek corridor

The Voluntary letter of offer accompanied with the planning proposal is informed by the Integrated Infrastructure Delivery Plan and feasibility analysis (Land valuation report).

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

As discussed in the planning proposal, it is inconsistent with the proposed density and land-uses. However, the proposed uses and increased density would achieve better outcomes than those envisaged in the Strategy. A through assessment against the PRCUTS Planning and Design Guidelines is provided in the planning proposal.

*5. The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy.*

PRCUTS has projections of 700 new homes by 2050 and 2300 new jobs by 2050 in the Camperdown precinct. The following table in the PRCUTS Planning and Design Guidelines provides a more detailed breakdown of proposed growth projections and indicative land use mix. The relevant frame area projections are incorporated.

| CAMPERDOWN | | Additional Residential | | Additional Employment/ Jobs | |
|---|---|---|---|---|---|
| | | BY 2023 | BY 2050* | BY 2023 | BY 2050* |
| PRCUTS AS ENDORSED | ADDITIONAL GFA (SQM) | 0 | 72500 | 105000 | 241000 |
| | NO. OF DWELLINGS/ JOBS | 389 | 700 | 1400 | 2285 |
| Corresponding approximate average apartment size or work space ratio (sqm)** | | 0 | 104 | 75 | 105 |

It is noted that no residential GFA is expected in the Camperdown precinct before 2023, which contradicts the corresponding dwelling projections i.e. 389 new dwellings by 2023. The PRCUTS Implementation Plan 2016-2023 suggests that the first phase of implementation for the precinct only includes rezoning to B5 Business Development/ B7 Business Park, which would be primarily focused on employment uses and prohibit residential uses. Therefore, as no rezoning to accommodate residential development is suggested prior to 2023, the proposed increase in residential GFA appears correct while the projected dwelling growth by 2023 appears mistaken.

Additionally, PRCUTS work-space ratios (jobs/sqm) are overly large with an estimate of as much as 105 sqm per employee, which does not resonate with the type of business/health and education uses envisaged in Camperdown.

The anomalies with these projections suggest that the PRCUTS levels of growth would not be achieved. These projections are currently being reviewed by Council through the Employment and Retail Lands Strategy and Camperdown Innovation Precinct Land-use and Strategic Employment study. Council also has concerns regarding the loss of industrial land and conversion of industrial sites to any mixed-use type of development as the draft EaRLS identifies a critical shortage of industrial land in the LGA to meet the demands for future.

The proposal is inconsistent with the proposed 2023 dwelling projections. The proposal could potentially contribute towards the long term dwelling projections of the precinct,

| | |
|---|---|
| **Criteria 1 - Strategic objectives land use** | however, currently in the NSW planning system, boarding houses are not counted as dwelling numbers and therefore, it's questionable whether the proposed development would contribute towards any residential projections.<br><br>This creates further concerns for Council - if the boarding house units are not counted as dwellings, these are not being accurately accounted for in any local/ state infrastructure forecasts and therefore, would continue to be an unplanned for burden on current/future infrastructure. This issue is beyond the proposal's scope but the proposal is acceptable on the basis that provision of student housing uses is generally aligned with the vision of PRCUTS.<br><br>The proposal would also support employment uses on the site related health, education, biotechnology sectors and contribute towards Camperdown precinct's 2023/2050 employment projections by providing 980sqm of employment floor space with the capacity to accommodate approximately 25 jobs. |
| | 6. The planning proposal demonstrates design excellence can be achieved, consistent with Council's adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines. |
| | The proposal has been subject of a rigorous design process by proponent's consultants, Council officers and external independent peer review undertaken by Architectus. Consistency with the Parramatta Road Corridor Planning and Design Guidelines has been discussed in the Planning Proposal. The proposed design is based on good urban design principles which would assist in revitalisation of the site.<br><br>In addition the future development applications would be considered by the Inner West Council's Architectural Excellence Panel, to ensure any future development for the site demonstrates design excellence. |
| | **Criteria 2 – Integrated Infrastructure Delivery Plan** |
| **Criteria 2 - Integrated Infrastructure Delivery Plan** | *An Integrated Infrastructure Delivery Plan, which identifies advanced infrastructure provision and cost recovery for the local and regional infrastructure identified in the Infrastructure Schedule, must support the planning proposal. The Integrated Infrastructure Delivery Plan must demonstrate a cost offset to council and agency costs for a set period that aligns with the anticipated timing for land development identified in the Implementation Plan 2016 - 2023. Infrastructure to be considered includes:*<br><br>• *Public transport*<br>• *Active transport*<br>• *Road upgrades and intersection improvements*<br>• *Open space and public domain improvements*<br>• *Community infrastructure, utilities and services.* |
| | **Comments:** The Planning Proposal is accompanied by a revised Integrated Infrastructure Delivery Plan (IIDP) which provides a methodology for calculating local and state infrastructure contributions. The proponent has offered to make contributions towards infrastructure as part of the Planning Proposal/ VPA which are benchmarked against the Leichhardt Section 7.11 Contributions plan and offered in lieu of the local infrastructure contributions.<br><br>Council commissioned Elton Consulting to undertake an independent external review of the proponent's Integrated Infrastructure Delivery Plan.<br>The peer review conforms that due to the nature of the development (student housing) there will not be a significant impact on the local and state infrastructure. IT is concluded that:<br><br>• The proposed site is located within walking and cycling distance of key destinations, and is close to existing, high frequency buses which will encourage public transport usage for intermediate or regional trips.<br>• The proposal would not generate demand for childcare services, primary or secondary schools, aged care facilities and minimal demand from other community facilities. Many of the needs of occupants can be met by their respective tertiary institutions. |

**Criteria 2 - Integrated Infrastructure Delivery Plan**

- The proposed minimum parking, with zero provision for student housing, would encourage active transport or public transport and would alleviate traffic congestion in the area and limit its impact.
- The proposal would not trigger recreational benchmarks or provisions, and the small demand generated from the proposed development can be absorbed by the local area;
- The proposal is accompanied with a Voluntary Planning Agreement offer of $1.025m to deliver through site link works in kind valued up to $350,000, land (stratum) dedication up to $580,000 and monetary contributions of $95,000. These contributions are offered in lieu of any local or state infrastructure contributions payable to Council or the Department of Planning.

It is noted that Leichhardt Developer Contributions Plan No. 3 does not provide an exemption for Boarding House developments, therefore contributions for transport and access would apply to the proposed development. The IIDP would have to be revised to reflect the s7.11 contributions applicable under this Plan, albeit then sought to be offset by the VPA offer.

There are some minor gaps in the proponent's IIDP such as consideration of utility infrastructure contributions which are required to support the power and gas infrastructure. These are generally paid by the developer at the DA stage and this is not a Planning Proposal matter. This would be indicated in the VPA which is being negotiated by Council's Strategic Investment Manager based on Council's Voluntary Planning Agreement Policy.

Elton also recommended that the proponent investigate protection treatments to the Ausgrid overhead wires. Electrical overheads, safe working and structural clearances are to be taken into consideration as part of the IIDP, to identify cost implication. Where electrical standards cannot be meet, modification of the existing overheads can be achieved by means of permanently insulating power line, relocation and/or undergrounding. Undergrounding overhead assets in the Camperdown precinct is not a requirement set out by PRCUTS (Planning and Design Guidelines). Although these items can be addressed post-Gateway through the Gateway Determination conditions.

The IIDP is found to generally satisfy this criterion, where it will have negligible impacts on surrounding infrastructure, including public and active transport, roads, open space and community facilities and services. This is by virtue of the site's location, with good access to transport, services and facilities, as well as the proposed use for affordable housing in the form of boarding housing (targeted as student accommodation).

The infrastructure contributions set out in the IIDP and proposed land uses generally align with the strategic planning framework where it contributes to housing affordability, provides employment generating land uses and Works in Kind to deliver a critical component of the Johnstons Creek recreational corridor. The proposal is recommended to proceed to Gateway subject to gaps identified by Elton to be revised post-Gateway.

**Criteria 3 - Stakeholder engagement**

**Criteria 3 Stakeholder Engagement**

*Consultation and engagement with relevant stakeholders (council, government agencies, business, community, adjoining properties and user or interest groups, where relevant) have been undertaken, including any relevant pre-planning proposal engagement processes required by local council.*

The proponent has submitted a Stakeholder Engagement report dated March 2020 which is a follow-up to the Stakeholder Engagement Report prepared by Ethos Urban in January 2018 lodged with a previous version of the planning proposal.

The Ethos Urban Stakeholder Engagement report was prepared in support of the previous Planning Proposal for the site which sought a rezoning from IN2 Light Industrial to R3 Medium Density Residential to allow an apartment building of up to 17m in height (six storeys) with a maximum floor space ratio of 2.6:1. The application sought to progress the objectives of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) released by the NSW Government in 2016.

On 30 October 2018, Council determined not to support the proposal, following advice from the Inner West Local Planning Panel on the 11 September 2018. This decision was on the basis of excessive bulk and scale and inconsistency with State and local government policy particularly relating to loss of employment lands.

The proponent subsequently requested Council to consider amendments to the planning proposal in May 2019 and December 2019. Council advised the proponent to update the stakeholder engagement report in January 2020 based on the current design scheme. The Stakeholder engagement report March 2020 outlines the follow-up

process undertaken by the proponent in January and February 2020 to meet the requirements of this criterion.

The follow-up process involved circulation of an information letter by the proponent to 310 local residents and businesses in a notification area agreed with Council (see the extent of area below). The letter provided updated details of the proposal and contact details for neighbours to ask questions and discuss the development with the proponent.

The proponent's stakeholder engagement report summarises three submissions received and responses to these submissions. In addition, 6 submissions were made directly to Council, one of which duplicates a submission to the proponent. So in total there have been 8 submissions to Council and the proponent in respect of the current proposal which represents 2.6% of the 310 properties notified. The concerns raised by these submissions include:

- community consultation
- bulk and scale
- character
- noise
- traffic and parking
- student housing (boarding house)

**Criteria 3 - Stakeholder engagement**

| | |
|---|---|
| | • heritage<br>• separation distance to 2B Chester Street West<br>• over use of Douglas Grant Park<br><br>Council officer responses to these issues are detailed in Appendix B. In addition, the proponent consulted 6 State Government agencies in respect of the original planning proposal. This has been detailed in the Planning Proposal. The proponent has also demonstrated extensive consultation with Council since 2017 as the proposal has been revised numerous times to meet Council's vision for the precinct.<br><br>The proponent has, therefore, demonstrated compliance with the pre-consultation required as part of this Checklist. Although 9 objections including one from RMS have been raised which have been addressed by Council officers as part of the planning proposal and Appendix - B summary of submissions. If the proposal is supported, the Gateway Determination will require consultation with community and public authorities to be undertaken by Council. Any issues raised will be incorporated into the Planning Proposal following consultation in the public exhibition period.<br><br>As such, the provisions have been suggested in the LEP that the draft instrument attached to the planning proposal is for exhibition purposes only and is subject to change as part of drafting the final LEP is supported. |
| **Criteria 3 - Stakeholder engagement** | *An appropriate level of support or agreement is documented.* |
| | As discussed above, the proposal is supported with sufficient level of information to demonstrate compliance with this criteria. |
| | *Provision of documentary evidence outlining the level of planning or project readiness in terms of the extent of planning or business case development for key infrastructure projects.* |
| | The proposal will not result in significant impacts on infrastructure demand, including public and active transport, roads, open space and community facilities and services. This is by virtue of the site's location with good access to transport, services and facilities as well as the proposed student housing use.<br><br>The proponent's offer for local infrastructure including delivering works in kind for Johnstons creek pedestrian and cycling link, land dedication to Council is a significant contribution with community and environmental benefits. This offer is informed by the proponent's IIIDP and land valuation report, also peer reviewed by Elton as discussed above.<br><br>Further consultation would be undertaken post-gateway with public authorities (inc. RMS/TfNSW/DPIE) to inform the proposal's state infrastructure contributions towards key infrastructure projects. State infrastructure contributions are also to be informed by the outputs of upcoming DPIE/IWC precinct-wide traffic and transport study. This can be imposed as a condition in the Gateway Determination. |
| **Criteria 4 - Sustainability** | **Criteria 4 Sustainability** |
| | *The planning proposal achieves or exceeds the sustainability targets identified in this Strategy.* |
| | The proposal makes provisions for site-specific LEP/DCP controls to achieve a 4-Star Green Star Building along with other sustainability provisions (ie. recycled water use, deep soil landscaping, reduced parking rates, car-sharing, electric vehicle charging etc). Assessment against PRCUTS sustainability and resilience requirements is provided below:<br><br>• *Future development should demonstrate consistency with the smart parking strategies and design principles outlined in Section 3.8 – Car Parking and Bicycle Parking:*<br><br>Comments: The proposal seeks to apply a zero car parking rate for the student housing, and PRCUTS car parking rates for employment uses resulting in minimal |

**Criteria 4 - Sustainability**

parking on site. Bike and motorcycle parking will also be provided with rates for student housing outlined in the draft site specific development controls and for other uses in accordance with PRCUTS.

- *Public domain and buildings shall be designed to reduce localised heat created by the urban heat island affect by:*
  - *maximising canopy cover on all streets that are designated as being Local, Places for People, or Vibrant on the Street Function Plans*
  - *targeting canopy cover of at least 60% over all pedestrian spaces (footpaths, trafficable pedestrian areas), and*
  - *maximising the use of vegetation on buildings, including above ground parking facilities. 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. Western and northern building facades should be particular areas of focus.*

  Comments: Site-specific provisions have been proposed in the LDCP to maximise canopy cover and vegetation on the site through inclusion of green roofs, and significantly increased landscaping across the site, including a deep soil zone along Johnstons Creek.

- *Flow rates from the site should not be more than pre-development site discharge. Stormwater run-off quality should seek to reduce annual loads of:*
  - *total Nitrogen by 45%*
  - *total Phosphorus by 65%, and*
  - *total suspended solids by 85%.*

  Comments: Stormwater management will be designed in accordance with Inner West Council requirements. The stormwater targets identified in PRCUTS are consistent with those in the Part E – Water of the Leichhardt DCP which will apply to the site.

- *Dwellings greater than 6 storeys without access to recycled water should achieve BASIX Energy 40 and BASIX Water 50.*

  Comments: The proposal is for 5 storeys. Further water and energy reduction will be addressed as part of the Green-Star Building rating requirements which would potentially exceed PRCUTS requirements. This has been covered in the proposed site-specific LEP/DCP provisions.

**Criteria 5 - Feasibility**

**Criteria 5 : Feasibility**

*The planning proposal presents a land use and development scenario that demonstrates economic feasibility with regard to the likely cost of infrastructure and the proposed funding arrangements available for the Precinct or Frame Area.*

Independent review of the IIDP has established that the proposal is generally consistent with this criterion except some gaps in the proponent's IIDP calculations relating to utilities and infrastructure costs. However, these are considerations for the development application and would be usually standard connection fees borne by the developer.

Further consultation can be undertaken with Ausgrid and other relevant utilities provider following the issue of Gateway Determination. The peer review has generally established that the proposed type of development will have negligible impacts on the surrounding infrastructure, including public and active transport, roads, open space and community facilities and services.

The proposal exceeds the FSR recommended by PRCUTS to allow a feasible development option where the retention and expansion of the employment uses on site is supported by the student housing proposal. The proposed local infrastructure contributions are considered reasonable and further negotiation with the proponent can be undertaken following the Gateway subject to condition regarding satisfactory local/state infrastructure contributions being imposed in the Gateway Determination.

**Criteria 6: Market Viability**

*The planning proposal demonstrates a land use and development scenario that aligns with and responds to market conditions for the delivery of housing and employment for 2016 to 2023. Viability should not be used as a justification for poor planning or built form outcomes.*

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| **Criteria 6 - Market Viability** | The Economic Impact Assessment prepared by AEC included with the Planning Proposal report (May 2019) includes market demand analysis which demonstrates strong demand for student housing and higher density employment space. The study highlights that there is a current transition towards a broader range of employment uses within the Camperdown Precinct, and buildings that allow for greater densities of employment floor space will respond to market demand. It also highlights that the site's proximity to Sydney CBD and Camperdown-Ultimo education and health facilities makes it an important location for employment growth supported by appropriate scaled residential development.<br><br>Consideration was also given to market demand for student housing by AEC, identifying that there is significant undersupply of 74,763 purpose built student accommodation beds in Sydney, and that there is significant demand within the Camperdown Precinct given its proximity to three major universities.<br><br>Additionally a letter from University of Technology Sydney was included with the Planning Proposal report (May 2019) which confirms that there is demand for purpose built student accommodation and employment space in the area to service the education sector. The proposed variation to the recommended PRCUTS FSR is justified as it would achieve better planning outcomes without adversely affecting the values of the surrounding area. The proposal would set a good precedent for the future redevelopments in the Camperdown precinct, supporting its transition to a biotechnology, health and education precinct. |

**APPENDIX - B – SUMMARY OF SUBMISSIONS REPORT**

8 submissions were received in total which do not support the proposal (2.6% of 310 properties notified).

| Issues | Officer's comment |
|---|---|
| **Bulk and scale**<br><br>The proposed height and FSR is excessive.<br><br>Proposed built form is out of context and is incompatible with the surrounding local character, in particular the existing residential area that is located across Johnstons Creek.<br><br>Incompatibility with the desired future character of Annandale. | The proposed built form is acceptable as it has been amended in response to design recommendations by an external independent peer review. Previous design schemes included a 6 storey height with no breaks in the street wall frontage to Johnsons Creek and with a FSR of 2.75:1.<br><br>The revised L-shaped building would result in an FSR of 2:1. A two storey frontage along Johnstons Creek and a 5 storey corner at Chester Street and the eastern boundary minimises the amenity impacts.<br><br>The proposed building separation of 35m – 60m to the residential dwellings on the north is acceptable as it significantly exceeds the 18m minimum separation distance required by the Apartment Design Guide. The proposed development is to the south of the submitters' residential properties. This large separation distance and the nature of the existing large industrial buildings south of the creek mean that any impacts on views or privacy would be minimal.<br><br>The adopted Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) and Camperdown-Ultimo Collaboration Area Place Strategy have envisioned this industrial precinct to become a future high density, urbanised health and education precinct.<br><br>The adjacent Kennard's site that faces on to Chester Street has been approved for construction of a 6 storey development of self-storage units and a ground floor retail unit. High density residential development, such as the Sterling Circuit (11-15 storey complex) opposite Kennard's Booth Street frontage already sets a precedent for the area. |
| **Heritage matters**<br><br>Incompatibility with adjacent Annandale Heritage Conservation Area.<br><br>Refers to the Fine Grain Study of PRCUTS of the need to ensure development in the vicinity of heritage items is designed and sited to protect heritage items.<br><br>Concerns regarding heritage | Submitters are concerned that the proposed development could detract from the character of the nearby Annandale Conservation Area. This matter has been given serious consideration by Council officers, the proponent's architects and heritage consultants and Council's appointed urban design peer reviewers. The site itself is not immediately adjacent to the Conservation Area as it is separated by a buffer zone made up of Johnstons Creek and the Douglas Grant Memorial Park.<br><br>The site is not a heritage item or in a Conservation Area. It is adjacent to the Chester Street kerb and gutter heritage item, which would be protected through a development consent condition. |

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| treatment of an old wall at the south west corner of site. | The existing modern building has a mixture of stone and brick remanent of a previous building foundation in the under croft next to the creek. Neither the Architectural Projects Heritage Assessment for the original Planning Proposal nor Leichhardt Council's own 2016 Parramatta Road Corridor Heritage Assessment by NBRS identified this as having any heritage significance.<br><br>The building design has been carefully and sequentially revised and calibrated to ensure that it will be a sympathetic contemporary infill development. The DCP and development application process will require the use of appropriate finishes to ensure that the significance of the neighbouring Conservation Area is not reduced.<br><br>The sections in the Urban Design Report also show that the topography rises on both sides of the Creek. The proposed built form is stepped back and up from the Creek. This complements a similar stepping up of the residential buildings on Chester Street and to the houses on Susan Street.<br><br>Consequently although the proposed building is large, it will not dominate the nearest buildings in the Conservation Area. |
| **Setback to Johnstons Creek**<br><br>How was the 6m setback determined?<br><br>Concerns regarding Council's plan for a cycling link along the creek. | Council adopted 'Leichhardt and Camperdown Precincts Public Domain Master Plan' in October 2019 under the Parramatta Road Urban Amenity Improvement Program (PRUAIP) that will be fully funded by the NSW Government.<br><br>The Masterplan proposes a new shared pedestrian and cycle link along Johnstons Creek to improve connectivity to Rozelle Bay, Bicentennial Park, Glebe from areas south of Parramatta Road in Camperdown and Stanmore. The link will be landscaped to enhance biodiversity and integrate habitat corridor to existing open spaces.<br><br>During the public exhibition of Council's Masterplan, several objections were received in relation to the possibility that small sections of private land might be required to build the pedestrian and cycle link. Individual consultation with each property that may be affected by this corridor was undertaken by Council.<br><br>These concluded that as the section of the path to the south of the planning proposal site is not for immediate implementation, further investigations will determine its final alignment and whether other private land will be needed.<br><br>The 6m setback for this site is however considered to be the minimum size to incorporate a 3.5m shared path, landscaping, tree planting, lighting and safety barriers at |

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| | this point as well as responding to flooding and safety issues. |
| **Building Separation**<br><br>Gaps in the urban design report in relation to the separation from 2B Chester Street West, Annandale. | The proposed building separation of 35m - 60m to the residential dwellings on the north is acceptable as it significantly exceeds 18m minimum separation distance required by the Apartment Design Guide. |
| **Noise and privacy impacts**<br><br>Adverse noise and overlooking impacts to residential properties to the west of the site and to Douglas Grant Park.<br><br>Specific concerns about sound reverberation in relation to the topography of the stormwater channel and park. | The large separation distance will also reduce potential noise impacts. The existing car repair use of the site has noise impacts. The changed impacts would be addressed by a detailed acoustic and noise impact assessment at the DA stage. |
| **Impacts to public open space**<br><br>Concerns regarding 'boarding house' impacts on Douglas Grant Memorial Park. This includes potential anti-social behaviour, loud noise and impacts on safety of users. | Council upgraded the Douglas Grant Park between the site, Creek and the nearest dwellings in recent years to introduce play equipment and barbecue facilities. Some of the submitters suggested that the planning proposal development would lead to overuse of the park and nuisance type behaviour. These submitters stated that such behaviour was already a cause of concern, however, Council's Parks Department has not received any such complaints and considers the park is currently underused.<br><br>The proposed built form would enhance passive surveillance of the park, especially at night which can in-turn, reduce crime and inappropriate behaviour. |
| **Traffic, parking and access**<br><br>Existing area does not have adequate on-street parking issues for residents.<br><br>Concerns regarding likelihood of future occupants of the development to park on local streets located over Johnstons Creek.<br><br>Potential increase of traffic on existing narrow local streets. | Traffic and parking posed concerns for several submitters as the proposal does not include sufficient parking spaces for future residents/users. This approach is designed to encourage students to use active transport because of the proximity of the site to Universities, Parramatta Road and Booth Street bus routes. No parking permits will be issued for off-site parking at the DA stage.<br><br>Council can investigate extending on-street parking restriction hours on the north-side of the Creek to discourage people without resident permits from parking in that area. The proponent's proposed 18 car parking spaces associated with employment uses would be over the minimum parking rates required by PRCUTS and Council's DCP policy. The proponent's traffic report has demonstrated that traffic generation associated with the future development will be less than the levels that that could be generated by uses permitted under existing controls. The prospective traffic and parking impacts are, therefore, minimal. |
| **Rezoning of industrial land** | The proposal will provide 980sqm of modern light industrial and business floorspace with a minimum FSR of 0.75:1 for |

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|---|---|
| The proposed rezoning will relocate the existing vehicle repair business.<br><br>The proposal would facilitate a development that would not offer similar services as the existing vehicle repair that currently occupies the site. | employment uses within the overall floorspace of 2:1. This will be targeted for use by tech start-ups, innovation, creative industries, cultural/community activities and artists. This approach is consistent with Council's Draft Employment and Retail Lands Strategy which identifies a projected shortfall of employment floorspace in the Inner West.<br><br>The proposal is also consistent with the PRCUTS and the Camperdown-Ultimo Place Strategy shared vision of the area as a high density, health and education, urbanised neighbourhood. |
| **Boarding house supply**<br><br>Inner West Council already has an adequate supply of high density boarding houses.<br><br>The use would potentially change local character and reduce the safety of the residential community. | The proponent's Social Impact and Housing Affordability Assessment (April 2019), prepared by Cred Consulting, identifies that the Inner West LGA has a lower provision rate of private rental stock for both low and very low income households. The assessment also identified that Camperdown has no dwellings that are affordable based on 30% of the median income for the suburb.<br><br>The proposal would provide a 'new gen' boarding house to accommodate students as envisioned by the Parramatta Road Corridor Urban Transformation Strategy and the Camperdown-Ultimo Collaboration Area Place Strategy.<br><br>Consequently, this accommodation will be student housing rather than a conventional boarding house and as such its provision will mean its student residents will not be competing for other forms of housing in the vicinity.<br><br>The issues of impacts on local character and public safety have been fully addressed above. In summary, the Council's parks departments considers the Douglas Grant Memorial Park is underused. The proposed building will increase use of the park and enhance passive surveillance of the area, thereby, imposing safety rather than reducing it. |
| **Community Consultation issues**<br><br>Proponent has not undertaken adequate community consultation. | It is important to note that the stakeholder engagement undertaken so far is proponent-led as required by the PRCUTS Out of Sequence Checklist. Council as well as other State government agencies and community were all consulted as stakeholders in this process. Formal community consultation will be undertaken by Council in accordance with the legislative requirements and the requirements of a Gateway Determination if the planning proposal is supported by Council and DPIE. |