

Appendix L

Summary of submissions to the public exhibition of the draft Planning Propsoal, associated DCP amendment and affordable housing program

SUMMARY OF SUBMISSIONS TO THE DRAFT PLANNING PROPSAL: EMPLOYMENT LANDS AND DRAFT AMENDMENT TO SYDNEY DEVELOPMENT CONTROL PLAN 2012

List of abbreviations

B4	B4 Mixed Uses zone
B5	B5 Business Development zone
B6	B6 Enterprise Corridor zone
B7	B7 Business Park zone
IN1	IN1 General Industrial zone
CHP	Community Housing Provider
LEP	Local Environmental Plan
DCP	Development Control Plan
FSR	Floor Space Ratio
CSPC	Central Sydney Planning Committee
City	City of Sydney organisation
Council	Council of the City of Sydney (elected representatives)
DPE	Department of Environment and Planning
LGA	Local Government Area
URA	Urban Renewal Area
RMS	Roads and Maritime Services
TfNSW	Transport for NSW
Town Centre	Green Square Town Centre
GSURA	Green Square Urban Renewal Area
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
Sydney DCP	<i>Sydney Development Controls Plan 2012</i>
Sydney LEP	<i>Sydney Local Environmental Plan 2012</i>
Study	<i>Employment Lands Study, at Appendix B, Attachment A</i>
Strategy	<i>Employment Lands Strategy, at Appendix C, Attachment A</i>
AH Analysis	<i>Southern Employment Lands Affordable Housing Needs Analysis, at Appendix H, Attachment A</i>
Program	<i>Draft Employment Lands Affordable Housing Program, at Appendix J, Attachment A</i>
Guideline	<i>A Guideline to Preparing Site Specific Planning Proposals in the City of Sydney Employment Lands Investigation Areas, at Attachment D</i>
Infrastructure Plan	<i>Southern Employment Lands Infrastructure Plan at Appendix I, Attachment A</i>
Urban Design Study	<i>Southern Employment Lands Urban Design Study, at Attachment C</i>
Economic Study	<i>Employment Lands Economic Analysis and Opportunities Study, at Appendix F, Attachment A</i>
Transport Study	<i>Employment Lands Transport and Access Study, at Appendix G, Attachment A</i>

Description of subject site	Issues Raised	Response
<p>1. 33-39 Bowden Street, Alexandria</p> <p>The subject site is part of the area referred to as the 'excluded' lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O'Riordan Street, and the Sydney Water easement and are currently zoned 10(e) or 10(d). The subject site is currently zoned 10(e) and is proposed to be zoned B6.</p>	<ol style="list-style-type: none"> 1. The Study, on which the planning proposal is based, does not address the impacts of prohibiting residential development from land on which this is currently permissible. 2. Council should have approached the affected land-holders directly prior to the preparation of this report and indeed during the preparation of supporting studies. 3. There is a depreciation of land value that would result from the proposed prohibition of residential development. 4. The subject land should continue to contribute to the GSURA by providing residential activity to support the Town Centre and its infrastructure. 5. Proximity to transport makes it suitable for residential and diminishes any impacts development may have on traffic. 6. The Draft Planning Proposal does not adequately respond to the Section 117 Ministerial Directive 3.1- Residential. 	<p>This submission was made when the draft Planning Proposal was reported to Council in June 2014 (pre-public exhibition).</p> <ol style="list-style-type: none"> 1. The purpose of the Study was to determine the long-term demand for industrial and business zoned land in the City and make land use recommendations to guide the development of appropriate planning controls that support the economic needs of metropolitan Sydney and the State. 2. In developing the draft controls the City has undertaken extensive consultation with a range of stakeholders over a period of three years. Consultation milestones are detailed at the project chronology provided at Attachment G. 3. In the main, land within the employment lands is proposed for rezoning from industrial to higher order employment uses and as a result are generally likely to increase in value. <p>Notwithstanding this, while every effort has been made to not unreasonably impact on land values, the draft controls are a strategic approach to a key issue of concern for both the City and the NSW Government, being the retention of employment lands. They support the economic needs of metropolitan Sydney and the State and the local community, not the interests of individual landowners and a desire to maximise land values.</p> <ol style="list-style-type: none"> 4. While GSURA plays an important role in facilitating residential development for the City's growing population, it must also ensure that in the long term it will be a well-functioning urban environment where residents have access to services and jobs. This is the role the employment lands play in the wider context of urban renewal of the City south. 5. The location of the subject site and its proximity to the Green Square train station makes it equally attractive for employment purposes, maximising opportunities for workers and customers to utilise public transport. 6. The planning proposal is justifiably inconsistent with Section 117 Direction 3.1. The Study and Strategy identify these lands as being strategically important employment lands and the evidence indicates residential uses are likely

		<p>7. It is recommended that the sites should permit shop-top housing and seniors housing.</p>	<p>to displace employment uses. It is justified that the land zoned 10(e) and 10(d) Mixed Use be rezoned solely for employment generating purposes.</p> <p>7. This recommendation is not supported.</p> <p>It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the Strategy provides avenues for limited residential growth (both market and affordable rental) in ‘investigation areas’ where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is not within an identified ‘investigation area’ given its potential to support employment generating uses in the long term.</p>
<p>2.</p>	<p>140-148 McEvoy Street, Alexandria</p> <p>The subject site is part of the area referred to as the ‘excluded’ lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O’Riordan Street, and the Sydney Water easement and are currently zoned 10(e) or 10(d). The subject site is currently</p>	<p>1. Consistent with ‘mixed-use’ vision for Green Square, the retention of the mixed use zoning is essential to ensure a sensible mix of environmentally compatible land uses in the future.</p> <p>2. Section 117 Ministerial Direction 3.1 - Residential Zones provides that a draft LEP shall not contain provisions which will reduce the permissible residential density. The proposed rezoning would be contrary to this Direction</p>	<p>This submission was made when the draft Planning Proposal was reported to Council in June 2014 (pre-public exhibition).</p> <p>1. While GSURA plays an important role in facilitating residential development for the City’s growing population, it must also ensure that in the long term it will be a well-functioning urban environment where residents have access to services and jobs. This is the role the employment lands play in the wider context of urban renewal of the City south.</p> <p>2. The planning proposal is justifiably inconsistent with Section 117 Direction 3.1. The Study and Strategy identify these lands are strategically important and the evidence indicates residential uses are likely to displace employment uses. It is justified that the land zoned 10(e) and 10(d) Mixed Use be rezoned solely for employment</p>

<p>zoned 10(e) and is proposed to be zoned B6.</p>	<p>3. Restrictive zoning with a focus on employment-generating uses is of no use if that land remains dormant or under-utilised as has been the case with the Slazenger site. It can only sterilise land, particularly where there is a history or pattern of disinvestment or abandonment.</p> <p>4. The premise of the Study that some form of housing as part of a genuine, mixed-use development will somehow crowd out future commercial and industrial uses is disputed.</p>	<p>generating purposes.</p> <p>3. The zoning being proposed is not considered restrictive. While the subject site has remained deferred from the Sydney LEP 2012, it has long been recognised by the City as suitable for employment generating purposes, rather than residential uses. While speculation on the potential for residential uses on the site are likely to have played a role in its currently underutilised state, the site is located in a successful mixed business precinct and there appears no reason why the subject site could not be successfully developed for commercial, retail or light industrial purposes.</p> <p>4. The Economic Study, concludes that independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to value and developer demand. It finds that in the context of the LGA where residential uses are permitted within employment zones, the viability of non-residential uses is limited.</p> <p>Additional analysis, provided in the City's review of the NSW Government's <i>A Plan for Growing Sydney</i>, shows clear limitation on employment generation capacity where employment uses are forced to compete with residential uses for floor space. Between 2007 to 2011 in the Green Square and City South Village Area there was a 7.5% increase in jobs in the localities that permit residential development while in areas that don't permit residential it was close to 12%.</p>
<p>3. 23 Bowden Street, Alexandria</p> <p>The subject site is part of the area referred to as the 'excluded' lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O'Riordan Street, and the Sydney Water easement and are currently zoned 10(e) or 10(d). The subject site is currently</p>	<p>1. The value of property on the southern side of Bowden Street would be impacted in a severely adverse manner.</p>	<p>This submission was made when the draft Planning Proposal was reported to Council in June 2014 (pre-public exhibition).</p> <p>1. In the main, land within the employment lands is proposed for rezoning from industrial to higher order employment uses and as a result are generally likely to increase in value.</p> <p>Notwithstanding this, while every effort has been made to not unreasonably impact on land values, the draft controls are a strategic approach to a key issue of concern for both the City and the NSW Government, being the retention of employment lands. They support the economic needs of metropolitan Sydney and the State and the local community, not the interests of individual landowners and a desire to maximise land values.</p>

	<p>zoned 10(e) and is proposed to be zoned B6.</p>	<p>2. Because of the narrowness of Bowden Street, there would be conflict between any residential occupants on one side of the street with industrial occupants on the south.</p> <p>3. The mixed use zoning would more sensibly run to the south of the properties fronting the southern side of Bowden Street.</p>	<p>2. The draft controls do not generally facilitate residential development north of Bowden Street, though some affordable housing may be permitted where it does not impact on the existing employment generating uses.</p> <p>Notwithstanding this, the Strategy provides an avenue for limited residential growth (both market and affordable rental) north of Bowden Street, but only where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>3. The subject site has been identified within the B6 zone and is to be retained for employment uses. The interface between possible future residential uses to the north of Bowden Street and the employment generating uses to the south can be appropriately managed.</p>
4.	<p>23 Bowden Street, Alexandria</p> <p>The subject site is part of the area referred to as the 'excluded' lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O'Riordan Street, and the Sydney Water easement and are currently zoned 10(e) or 10(d). The subject site is currently zoned 10(e) and is proposed to be zoned B6.</p>	<p>1. The value of property on the southern side of Bowden Street would be impacted in a severely adverse manner.</p> <p>2. Because of the narrowness of Bowden Street, there would be conflict between any residential occupants on one side of the street with industrial occupants on the south.</p>	<p>This submission was made when the draft Planning Proposal was reported to Council in June 2014 (pre-public exhibition).</p> <p>1. In the main, land within the employment lands is proposed for rezoning from industrial to higher order employment uses and as a result are generally likely to increase in value.</p> <p>Notwithstanding this, while every effort has been made to not unreasonably impact on land values, the draft controls are a strategic approach to a key issue of concern for both the City and the NSW Government, being the retention of employment lands. They support the economic needs of metropolitan Sydney and the State and the local community, not the interests of individual landowners and a desire to maximise land values.</p> <p>2. The draft controls do not generally facilitate residential development north of Bowden Street, though some affordable rental housing may be permitted where it does not impact on the existing employment generating uses.</p> <p>Notwithstanding this, the Strategy and draft controls provide an avenue for limited residential growth (both market and affordable rental) north of Bowden Street, but only where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p>

		3. The mixed use zoning would more sensibly run to the south of the properties fronting the southern side of Bowden Street.	3. The subject site has been identified within the B6 zone and is to be retained for employment uses. The interface between possible future residential uses to the north of Bowden Street and the employment generating uses to the south can be appropriately managed.
5.	<p>Moore Park Supa Centa</p> <p>The subject site is zoned B5 and is proposed to be identified on Schedule 1 of the LEP as having an additional permissible use of 1,000sqm of 'shops'.</p>	Submission prepared for the Department of Planning and Environment and referred to the City for information. See submission 12 for submission made to the City.	This submission was made when the draft Planning Proposal was reported to Council in June 2014 (pre-public exhibition). For a further submission relating to the site see submission 12.
6.	<p>13-21 Mandible Street & 27-41 Hiles Street, Alexandria</p> <p>The subject sites are located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 1. With regard to 27-41 Hiles Street, is concerned the alignment of the proposed road through the subject land will have unreasonable burden the site. 2. With regard to 13-21 Mandible Street, is concerned with the proposed through site link along the eastern edge of the site. The location of the link is prescriptive and there may exist other alternative means or locations by which pedestrian movement is facilitated between Mandible Street and Hiles/McCauley Streets. 	<p>This submission was made when the draft Planning Proposal was reported to Council in June 2014 (pre-public exhibition). For a further submission, which also relates to the subject sites, see submission 17. It is noted Council officers have met with the land owners to discuss their submission.</p> <ol style="list-style-type: none"> 1. The draft <i>Planning Proposal: Heritage listing of industrial and warehouse buildings</i> was considered by Council and the CSPC in October 2014 and a Gateway determination issued for its public exhibition in December 2014. The Planning Proposal recommends the listing of the North Alexandria industrial conservation area. As a result of the recommended listing, the proposed street from McCauley Street to Hiles Lane has been removed from the draft DCP. 2. Improving pedestrian and cycle movement throughout the employment lands is critical to ensure that over time the transport mode shift to sustainable forms of travel, such as walking and cycling, can be achieved. <p>The employment lands generally, and the area in which the subject site is located specifically is limited in terms of east-west connections (both roads and paths), and is poorly linked with the primary transport hubs in the area, being the Green Square Train Station and the bus routes along McEvoy Street and Botany Road. Additional development, such as that which will result from the rezoning of the employment lands, cannot be supported where there is not a clear undertaking to identify and implement opportunities to improve the public domain</p>

		<p>3. Also regarding 13-21 Mandible Street, is concerned with the water channel open space link identified on the 'Green Square Structure Plan' map. It is unclear from the draft DCP as how this is to be implemented, nor its exact location, dimensions or the extent of any building setbacks from the alignment.</p> <p>4. It is also unclear whether the extent of community infrastructure identified in the draft DCP will be fully offset against any required Section 94 or other public benefit contributions.</p>	<p>through the application of planning controls.</p> <p>The through site links were established following significant urban design analysis. As it relates to this matter, the role of the DCP is to identify the best location for through site links so that landowners and the community are aware of the future plans for the area and how individual sites may need to respond to the wider needs of the area.</p> <p>If, at the time of lodging a development application the proponent can demonstrate that a better outcome can be achieved by locating the link elsewhere, an alternate approach may be considered in the context of that application. Identification of these links now is, in balance, is beneficial and allows for a coordinated approach to the development of the area over time.</p> <p>3. The 'water channel open space link' has been removed from the 'Green Square Structure Plan' map. While not in the exhibited draft DCP, the proposed controls identify the 'Liveable Green Network' along the stretch of the open channel from just south of Bowden Street to Wyndham Street. This is to reflect the water channel open space link identified in the 'Green Square Structure Plan' and to provide more clarity for landowners about how the setback is to be achieved.</p> <p>4. Because the site is within the GSURA, it is subject to the City's community infrastructure scheme which allows for additional FSR where development contributes to community infrastructure, for example where a land is dedicated for a road. Where the value of the works in kind and/or dedication of land exceed the value of the community infrastructure floor space, additional offset of Section 94 contributions may be available. This is considered in the context of a development application.</p>
7	<p>Various</p> <p>The submission relates generally to the proposed B6 zone and more specifically to the land bound by Huntley Street, Bourke Road, Wyndham Street</p>	<p>The need for housing in St Peters and Green Square means that shop top housing should be permitted in the B6 zone and/or the land bound by Huntley, Bourke, Wyndham and McEvoy.</p>	<p>While GSURA plays an important role in facilitating residential development for the City's growing population, it must also ensure that in the long term it will be a well-functioning urban environment where residents have access to services and jobs. This is the role the employment lands play in the wider context of urban renewal of the City south.</p>

	and McEvoy Street.		
8	<p>Parramatta Road precinct</p> <p>The submission relates generally to the Parramatta Road Employment Lands which are currently zoned IN2 and are proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 1. Supports affordable housing on this site as well as buildings to support a range of commercial opportunities. 2. Any new developments on the site should be consistent with the heights of recently approved buildings immediately to the west of the site – no more than 4-5 stories. 3. Development should not adversely affect the environment. Specific controls should be added for the Glebe/Forest Lodge employment lands to protect and enhance existing habitat/and/or create new areas of habitat along the Orphan School Creek corridor, as well as controls to encourage the provision of green roofs and green walls on all new commercial buildings. 	<ol style="list-style-type: none"> 1. Affordable housing is permitted in the B7 – Business Park zone where it does not undermine the objectives of the zone. Support for the approach is noted. 2. Building heights in the Parramatta Road Employment Lands are not proposed to be amended with the draft controls, with maximum building heights remaining between 12 - 15 metres (2 – 5 storeys). 3. The Orphan School Creek corridor is unlikely to be affected by the proposed draft controls. While the protection and enhancement of existing habitat, and the potential to create new habitat along the corridor is supported by the City, it is not relevant to these draft controls.
9	<p>29-33 Bowden Street, Alexandria</p> <p>The subject site is part of the area referred to as the 'excluded' lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O'Riordan Street, and the Sydney Water easement and are currently zoned 10(e) or 10(d). The subject site is currently zoned 10(e) and is proposed to be zoned B6.</p>	<ol style="list-style-type: none"> 1. The site forms part of GSURA and should continue to contribute to the mixed use vision of the area by providing residential activity to support the Town Centre and its infrastructure. It would also contribute to the improvement of Perry Park. 2. The site has immediate access to public transport and is therefore suitable for residential development. 3. The Study provides an argument in favour of some residential uses as part of a mixed use precinct but provides no clear boundary. 	<ol style="list-style-type: none"> 1. While GSURA plays an important role in facilitating residential development for the City's growing population, it must also ensure that in the long term it will be a well-functioning urban environment where residents have access to services and jobs. This is the role the employment lands play in the wider context of urban renewal of the City south. 2. The location of the subject site and its proximity to the Green Square train station makes it equally attractive for employment purposes, maximising opportunities for workers and customers to utilise public transport. 3. The Study provides the broad evidence for land use change and the principles as to what and where employment lands might be needed and accommodated in the future. It provides some evidence for residential development in some parts of the employment lands where it contributes to the objectives of these lands. <p>In preparing statutory planning controls and establishing appropriate zoning a range of matters were taken into consideration, including, but not limited to:</p> <ul style="list-style-type: none"> • the recommendations of the Study; • NSW Government directions and projects; • the Directions and targets of <i>Sustainable Sydney 2030</i>; • submissions made to the public exhibition of the Background Paper, Study and draft

	<p>4. The Study supports a vision of a 'genuine mixed use precinct' with a 50 / 50 split between commercial and residential uses. This is consistent with Florida's text on mixed use economies. However the planning proposal only refers to denser more flexible spaces and makes no reference to residential.</p> <p>5. Affordable housing in the B7 zone is subject to Guidelines and a Program that was not available at the time Council considered the Planning Proposal.</p>	<p>Strategy;</p> <ul style="list-style-type: none">• the particular characteristics of sites, blocks and precincts;• subdivision patterns;• environmental constraints;• existing uses and built form; and• the findings and recommendations of the various technical studies. <p>The statutory controls also needed to respond to the limitations of the Standard Instrument (LEP) in achieving the City's objectives and vision for the employment lands, a vision which cannot be achieved by generally permitting residential uses in the employment lands.</p> <p>In reviewing all material, the B6 zone is the most appropriate zones for the subject site.</p> <p>4. The Study does not recommend high value, high density residential accommodation. It supports a vision of a 'genuine mixed use precinct' in some areas of the employment lands. However, further analysis shows that residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the Strategy provides avenues for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is not within an identified 'investigation area' given its potential to support employment generating uses in the long term.</p> <p>5. Permitting affordable housing in the B7 zone is consistent with the Study in that it promotes opportunities for affordable housing to locate in the employment lands. Alongside the draft controls, Council endorsed the principles</p>
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		<p>6. The Draft Planning Proposal does not adequately respond to the Section 117 Ministerial Directive 3.1- Residential.</p> <p>7. It is recommended that the B7 zone be converted to a legitimate mixed uses zone and the boundary be extended to include the subject property or that shop top and senior housing be permitted on the subject site.</p>	<p>underpinning the draft Program. The Program was publicly exhibited together with the draft controls and is being considered by Council with this report. The guideline, which has no direct bearing on the current proposal before Council to change the planning controls, is also being considered by Council with this report.</p> <p>6. The planning proposal is justifiably inconsistent with Section 117 Direction 3.1. The Study and Strategy identify these lands are strategically important and the evidence indicates residential uses are likely to displace employment uses. It is justified that the land zoned 10(e) and 10(d) Mixed Use be rezoned solely for employment generating purposes.</p> <p>7. The recommendation of the submission is not supported for the above reasons.</p>
10	<p>Alexandra Canal</p> <p>The submission relates generally to the area within the catchment of the Alexandra Canal.</p>	<p>1. Supports the restoration of vegetation around waterways as part of the proposed Liveable Green Network and open space network outlined in the draft DCP.</p> <p>2. Given the history of the project area, there is a reasonable possibility that underlying groundwater resources may be contaminated. The Office of Water should be consulted if groundwater is likely to be intercepted or extracted at any stage during development and construction in the employment lands.</p>	<p>1. Noted.</p> <p>2. Noted. Development that would result in the interception and/or extraction of groundwater is generally considered integrated development under the EP&A Act and would be referred to the Office of Water for approval under the <i>Water Management Act 2000</i>.</p>
11	<p>49-59 O’Riordan Street, Alexandria</p> <p>The subject site is located in the proposed B6 zone and within the area identified on Schedule 1 of the LEP which permits bulky goods and vehicle sales and hire premises as additional permissible uses. It is currently zoned IN1.</p>	<p>1. The land use table should be reviewed to ensure transparency in relation to shops. The draft planning proposal includes ‘retail premises’ as not-permitted while permitting ‘shops’ – so it would both permit shops and prohibit them. A similar issue has occurred in relation to hotel or motel accommodation.</p> <p>2. The 15% FSR bonus for new roads is not consistently referred to in the exhibition</p>	<p>1. The land use table is prepared in accordance with the Standard Instrument (LEP) and Department of Planning and Environment guidelines. Guideline PN 11-003 provides for:</p> <ul style="list-style-type: none"> • ‘group terms’, such as commercial premises’; • ‘sub-sets’ of a group term, such as ‘retail premises’; and • a defined land use term which falls under a group term, such as a ‘shop’. <p>In preparing a land use table a council may prohibit a group or subset term, but permit by exception a defined land use that falls under the group/subset term. The guideline identifies the intent of the group terms approach being to minimise the length of the land use table.</p> <p>2. Following further consideration of the proposed</p>

	<p>documents (the planning proposal refers to 15% while the drafting instructions refers to 10%). In addition the 15% incentive may not be enough to deliver the roads i.e. an additional 15% in height would only allow 1.8 additional height. A better incentive would allow for an additional storey. This would help deliver the east-west street that would link O’Riordan and Bourke.</p> <p>3. The planned north-south street running between the existing alignment of O’Riordan and Bourke is not achievable and should not be retained on the DCP Street Hierarchy map.</p>	<p>Clause 6.22, changes are proposed to better achieve the stated objective of the clause, which is to encourage the timely delivery of infrastructure to support growth in the employment lands. Proposed changes include:</p> <ul style="list-style-type: none"> • broadening the application of the Clause to apply to all sites where land may be dedicated for public domain, not only public roads. This is following consideration of a number of submissions that identified concerns about the impact that the range of requirements for public domain may have on development potential of certain sites; • where design excellence applies, reduce the incentive to up to 5% additional height or additional floor space, but allow the addition to be achieved together with additional height or floor space under the Sydney LEP Clause 6.21 - Design Excellence. The design excellence clause allows up to 10% additional height or floor space to be achieved where a development achieves design excellence. • Where design excellence does not apply, provide up to 15% additional height or additional floor space incentive; • exclude areas in GSURA, where the provision of community infrastructure is incentivised by Clause 6.14. <p>An additional up to 15% of height on top of a maximum height of 18 metres would allow for an additional 2.7 metres to be achieved which in most cases would facilitate an additional storey.</p> <p>3. Improving movement throughout the employment lands is critical to ensure that over time denser forms of development can be supported. Additional development, such as that which will result from the rezoning of the employment lands, cannot be supported where there is not a clear undertaking to identify and implement opportunities to improve access through the planning controls.</p> <p>The proposed roads were established following significant input from the City’s traffic and transport specialists as well as urban design analysis. As it relates to this matter, the role of the DCP is to coordinate how development responds and works towards an identified future vision for the employment lands. By identifying the best location for future roads, it ensures that as development occurs over time the infrastructure needed to support the</p>
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			<p>strategic vision is delivered.</p> <p>Sites can be bought and sold and redeveloped for a range of different purposes multiple times over a long period of time. The City therefore does not agree that the improved road network is 'not achievable' now or in the future. This is evidenced by the successful outcomes of the approach in the GSURA where the planning controls identified a future road network when the area was rezoned from industrial to mixed uses. This approach has resulted in considerable improvement to a road network that needed to respond to a new predominant use.</p>
<p>12</p>	<p>Moore Park Supa-Centa</p> <p>The subject site is zoned B5 and is proposed to be identified on Schedule 1 of the LEP as having an additional permissible use of 1,000sqm of 'shops'.</p>	<p>1. Objects to the proposal to permit up to only 1,000sqm total GFA of 'shops' on the subject site while all other sites within the southern employment area will be able to have up to 1,000sqm GFA per tenancy. The draft controls should be amendment so that they are the same for the subject site as they are for the employment lands. If the proposal is amended as above the owners would support a concurrent amendment of the Sydney DCP which would provide Council with a level of comfort the proposed change will not have adverse impacts on the Town Centre.</p>	<p>1. A 'cap' of 1000sqm for 'shops' applies to land within the Restricted Retail Development area identified in the Sydney LEP. DCP controls also apply and provide additional guidance about the interpretation of the LEP clause. The controls are to ensure that major retail locates in centres, where there is adequate infrastructure planned. The controls are informed by significant research being the <i>Green Square and Southern Areas Retail Study 2008</i> and the <i>Minor Retail Development in Green Square and the Southern Areas 2010</i>.</p> <p>The Supa-Centa is located outside of the Green Square Trading Area. Current controls do not allow for any 'shops', with 'bulky goods' being the only type of retail development allowed in the zone.</p> <p>The City is currently reviewing its retail strategies to consider recent development applications and a higher growth rate than expected in the GSURA. In addition, the Supa-Centa is to be included in the study boundary. The result of the review would potentially lead to amendments to the existing controls and may also expand the provisions to the Supa-Centa.</p> <p>The City is generally not supportive of amendment to retail provisions ahead of a comprehensive review. However in meeting with the landowner prior to reporting the draft controls to Council in June 2014, the City considered that allowing a small amount of 'shops' (up to 1000sqm) on the site would have only negligible impact on centres and would allow a level of consistency with adjoining areas.</p> <p>The City does not support more than 1000sqm of retail on the subject site ahead of the review of retail strategies, however, will continue to consult with the landowner as the review of</p>

		<ol style="list-style-type: none"> 2. The Draft Planning Proposal in its current form has anti-competitive consequences and runs contrary to the ACCC's Report of the <i>ACCC inquiry into the competitiveness of retail prices for standard groceries</i> in 2008 which shows a growing recognition to address the ways in which planning systems affect competition. A number of reports by the Productivity Commission and other bodies have all recognised the need to relax planning and zoning controls that limit competition and restrict retail space and its utilisation. 3. Allowing shops up to 1,000sqm GFA per tenancy on the site is unlikely to have adverse traffic impacts on the surrounding road network. 	<p>retail strategies is progressed.</p> <ol style="list-style-type: none"> 2. The City's controls provide a hierarchy of centres. The retail provisions are to ensure that not only the retail needs of the future population can be met, but that the GSTC will emerge as a vibrant and viable centre over time. 3. The traffic and access implications of a large number of 'shops', particularly in locations that are outside of strategic centres and largely reliant on private modes of transportation, is of concern to the City. Making amendment to the draft controls that would facilitate significant increase in 'shops' ahead of any assessment on the possible traffic and transport implications is not supported.
<p>13</p>	<p>Various</p> <p>The submission relates to the proposed affordable housing mechanisms within the employment lands.</p>	<ol style="list-style-type: none"> 1. Support those parts of the planning proposal for the City's employment lands that deal with affordable housing. The proposal recognises a need for affordable housing associated with proposed flexible land-use zonings and seeks to contribute some solutions, in the form of facilitating rental-housing dwellings 2. The third affordable housing principle which requires an income-based rent charging approach should be amended so that it is clearer. This could be done by adding words along the lines 'that seeks to avoid the household being in household stress'. 3. The defined term 'affordable rental housing' incorporates an understanding of providers, being CHPs, and target groups but leaves out the core factor in a meaningful definition, which is housing affordability. CHPs are not the sole providers of affordable housing elsewhere in the State and the critical factor is whether housing stress is avoided. 	<ol style="list-style-type: none"> 1. Noted. 2. The principle is consistent with the principles of the <i>State Environment Planning Policy No 70 – Affordable Housing (Revised Schemes)</i> and is suitably clear as drafted. Amendment is not required. 3. The City agrees that the definition of 'affordable housing' in the EP&A Act does not entirely capture the concept of 'affordability'. CHPs are not the sole providers of affordable housing across the State. However, in the context of the City of Sydney, the private residential market does not generally provide a product that is 'affordable' for very low to moderate income earners. The term 'affordable rental housing' is to guide an understanding of the meaning of affordable housing in the context of the Program, which is a dwelling managed by a CHP for the specific housing of very low to moderate income earners. The strict definition ensures the funds resulting from the scheme are allocated to providers who can ensure the resulting housing is consistent with the Principles.

		<p>4. The scheme document indicates it would be preferable for affordable rental dwellings to be incorporated into a proposed development, but if this is not possible an equivalent monetary contribution may be made. We agree with the general preference, on social mix grounds, but note that in a flat building where a community-housing provider does not own all or the majority or significant minority of the units it has no control over some of its costs [e.g. owner corporation fees], a situation that will affect its business model.</p> <p>5. The first condition for meeting the affordable-housing principles is that all dwellings are owned and/or managed by an eligible CHP. Contributions should be dedicated and the asset not held by a private firm and simply managed by a CHP.</p> <p>6. A provider who charges rents below 25% of household income is still meeting the criterion of affordable housing. The third condition for meeting the affordable-housing principles should be amended to reflect this.</p>	<p>4. Noted.</p> <p>5. Some amendment has been made to the requirement to limit dwellings to be owned by government or a CHP.</p> <p>6. Agreed. Amendment is supported.</p>
14	<p>15-17 O’Riordan & 7 Bourke Streets, Alexandria</p> <p>The subject site is part of the area referred to as the ‘excluded’ lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O’Riordan Street, and the Sydney Water easement and are currently zoned 10(e) or 10(d). The subject site is currently zoned 10(d) and is proposed to be zoned B7.</p>	<p>1. The Sydney LEP 2012 should identify ‘public utility undertaking’ as a permissible land use on the site which is consistent with the proposed operations on the site.</p> <p>2. Ausgrid objects to any proposals which would have the effect of prohibiting a proposed works depot at Nos. 15 - 17 O’Riordan Street, Alexandria and recommends that if ‘public utility undertaking’ is not included in the land-use table, then a ‘depot’ use should be added to Schedule 1 – Additional Permissible Uses of the Sydney LEP on the subject site.</p>	<p>Council officers have met with the landowner, Ausgrid, to discuss the matters raised in the submission. Ausgrid also met with DPE who verbally advised that</p> <p>1. The Standard Instrument Land Use Table – Direction 5 establishes the types of development that may be included in a Land Use Table. ‘Public utility undertaking’ is not identified in this table and therefore cannot be identified as a permissible use.</p> <p>2. Given the separation of the subject site from immediate residential uses and the need to provide for emergency utility service in the inner-City, a change to the exhibited planning controls to add an additional use of ‘depot’ to Schedule 1 is proposed.</p>
15	<p>61-71 Mentmore & 85-113 Dunning, Rosebery</p>	<p>Supports the proposed B7 zone and the proposed amendments to the DCP which strike an appropriate balance between promoting commercial activity in areas undergoing transition, and ensuring that impacts associated with</p>	<p>Noted.</p>

	<p>The subject site is located in the south 'investigation area' which is generally bound by Birminham Street, Ralph Street, Queen Street, Mentmore Avenue, Hayes Road, Rothschild Avenue, Harcourt Parade, Durdans Avenue and Gardeners Road. The sites are currently zoned IN2 and are proposed to be zoned B7.</p>	<p>commercial activities that are located near more sensitive land uses are appropriately managed.</p>	
16	<p>East-West Relief Route – residual lands, Alexandria</p> <p>The submission relates to the proposed affordable housing mechanisms within the employment lands.</p>	<ol style="list-style-type: none"> 1. As a major landowner, the City of Sydney supports the Planning Proposal which may provide opportunities for affordable housing in the proposed B7 zone and affects Council land on Botany Road, O’Riordan Street and Bourke Road Alexandria. 2. The proposed clause 7.25 should particularly restrictive and reduces the optimum yield potential for affordable housing within the B7 zone. The control should allow affordable housing at ground level where a good level of residential amenity is provided whilst still ensuring, where required, an active non-residential frontage to a street in the B7 zone. This may involve both residential and retail/commercial uses on ground floor and contribute to security and passive surveillance of the public domain. 	<ol style="list-style-type: none"> 1. Noted. 2. Agreed. The clause is to be amended to allow for affordable housing at the ground floor with commercial required where facing an existing or planned street.
17	<p>8-22 & 30-32 Bowden & 13-21 & 33-39 & 30 & 7-11 Mandible & 27-41 Hiles, Alexandria</p> <p>The subject sites are located in the northern 'investigation area' which is generally bound by McEvoy Street,</p>	<ol style="list-style-type: none"> 1. The proposed rezoning of the precinct to B7 Business Park prohibits a range of land uses including residential that would be appropriately located in this precinct being highly accessible to Green Square. The sites are suitable for residential development and should be zoned for it. The sites should be zoned B4 mixed uses. 	<ol style="list-style-type: none"> 1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating</p>

<p>Wyndam Street, Mandible Street and Bowden Street. They are currently zoned IN1 and are proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 2. There is a lack of detailed justification for the affordable housing requirements. 3. The proposed B7 zoning approach contradicts the recommendations of Council’s 2013 Study prepared by SGS Economics and Council’s draft Strategy which both recommended these lands be zoned for mixed-use purposes B4. The later Economic Study does not appear to contradict the SGS Study or make recommendations about the approach in the Draft Strategy as being incorrect. As such this is not evidence based policy. 	<p>uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognises some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in ‘investigation areas’ where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an ‘investigation area’ and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <ol style="list-style-type: none"> 2. The Program details a clear justification for the provision of affordable housing in the employment lands. 3. The draft Planning Proposal and draft DCP implement the recommendations of the Study. While recognising the potential for a B4 zoning to permit residential development in limited areas of the employment lands, the Study articulates a clear vision for the zone as a ‘genuine mixed use precinct’ and makes a number of recommendations about what the zone should include and what should be achieved in developing new planning controls for it. Notably these recommendations include: <ul style="list-style-type: none"> • <i>Ensure that as the rezoning of these precincts creates increased land values, a portion of the value uplift is directed towards works or services aimed at achieving the objectives of Sustainable Sydney 2030.</i> • <i>Ensure the objectives of the zone achieve the vision for the zone by actively encouraging a genuine mix of affordable residential and non-residential uses.</i> • <i>Ensure the zone provides flexibility to support both employment and appropriate residential uses.</i> • <i>Undertake a character, heritage and urban design assessment of the proposed mixed use precincts, recognising that appropriate controls will need to be developed...</i> <p>While the Study provides the broader evidence</p>
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for land use change and the principles as to what and where employment lands might be needed and accommodated in the future, in preparing statutory planning controls and establishing appropriate zonings a range of matters were taken into consideration, including, but not limited to:

- the recommendations of the Study;
- NSW Government directions and projects;
- the Directions and targets of *Sustainable Sydney 2030*;
- submissions made to the public exhibition of the Background Paper, Study and draft Strategy;
- the particular characteristics of sites, blocks and precincts;
- subdivision patterns;
- environmental constraints;
- existing uses and built form; and
- the findings and recommendations of the various technical studies as attached to the Planning Proposal.

The statutory controls also needed to respond to the restrictions of the Standard Instrument (LEP) in achieving the City's objectives and vision for the employment lands, a vision which cannot be achieved by generally permitting residential uses in the employment lands.

Upon review of all relevant material it is clear the B7 zone, not the B4 zone, is the most appropriate to achieve these recommendations because:

- residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone;
- market residential uses are also economically incompatible with the long term vision for the employment lands. The Economic Study, concludes that independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to value and developer demand. It finds that in the context of the LGA where residential uses are permitted within employment zones, the viability of non-residential uses is limited. A B4 zone would therefore undermine the goal of a 'genuine mixed use precinct';

	<p>4. The prerequisites for private residential development in the area are onerous and unreasonable, including that it occur by way of a site specific Planning Proposal and 50% of any new development be made available for affordable rental housing.</p> <p>5. The approach where a future planning proposal would need to be supported by the Director of Planning is unfair and unreasonable.</p> <p>6. By permitting only affordable housing in the B7 zone it is apparent that Council is intending to adopt an exclusionary zoning strategy. However Council has provided no evidence of instances where an exclusive zoning strategy has resulted in the provision of affordable rental housing as a consequence of community housing providers being able to purchase land at lower prices.</p>	<ul style="list-style-type: none"> • the B7 zone will allow some residential to locate in the zone, specifically affordable housing; • market housing can be considered on a site by site basis with specific controls being developed to respond to the unique and often complex context of a site. The Strategy, which sits outside of the proposed statutory controls, recognises some potential for market residential in ‘investigation areas’ in the long term. The Guideline provides a framework for the consideration of site specific planning proposals planning where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands. <p>4. The subject site is proposed to be rezoned B7. This zone does not permit market residential development. As above, the Strategy recognises some potential for residential uses in the area in the long term and provides an avenue for limited residential growth (both market and affordable rental) in ‘investigation areas’ where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands, in particular those objectives that seek to provide affordable housing to a growing workforce.</p> <p>5. Where planning proposals requests are lodged by landowners and developers they are assessed by the City. Where a planning proposal request has merit a report and draft planning proposal would be prepared for consideration on Council and the CSPC. If the planning proposal is supported it is then referred to the Department of Planning and Environment for consideration for a Gateway Determination.</p> <p>6. Permitting affordable housing in the B7 zone has not been tried before and there is no empirical data about how successful the approach may or may not be. Notwithstanding this, the approach has the support of the Centre for Affordable Housing, multiple community housing providers and peak community housing bodies, who have stated an understanding of the dire under provision of affordable housing in the inner-city and the need for new and fresh approaches to be attempted. The success or the failure of the approach is unlikely to impact on the subject site.</p>
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		<p>7. The zoning strategy including the proposed densities appear to be a significant disincentive to redevelopment and if implemented would represent an opportunity lost for what is a strategically important area within walking distance (<800m) of the Town Centre and associated railway station/bus interchange.</p> <p>8. The subject sites should be expressly excluded (deferred) from the Planning Proposal and any related amendments to the Sydney LEP should be separately considered by Council.</p>	<p>7. It does not follow that a zone that does not permit residential development is one where there is a 'disincentive' for redevelopment. The location of the subject site and its proximity to the Green Square train station makes the land equally attractive for commercial purposes, maximising opportunities for workers and customers to utilise public transport.</p> <p>8. It is unclear the intent of deferral of the sites from the draft controls. There is no undertaking from the City that a B4 zoning would be supported at a future time and deferring the sites would result in the retention of a IN1 zone in the middle of a 'higher order' zone, being the proposed B7. The B7 zone is significantly more flexible, in terms of the uses that are able to locate in the zone, than the IN1 zone.</p> <p>Furthermore, the identification of the sites in the Strategy as within the 'investigation areas' presents an opportunity for a B4 zone provided the rezoning would contribute to the objectives of the southern employment lands. A planning pathway therefore exists to potentially achieve the residential outcomes proposed by the submission.</p>
18	<p>Various</p> <p>The submission relates to the proposed affordable housing mechanisms within the employment lands.</p>	<p>City West Housing is a registered Class 1 CHP who since 1994 has developed 547 properties in the LGA. City West Housing supports the draft controls, particularly where they enable affordable housing, either through a levy or rezoning.</p>	<p>Noted.</p>
19	<p>Various</p> <p>The submission relates to the proposed affordable housing mechanisms within the employment lands.</p>	<p>States there is an urgent need for affordable housing, not only for families but for independent people who are the sole payers of mortgages, bills, rates, rent, etc. for these are not shared with the income from a partner. States that if the City of Sydney is sincere about making the city everyone's city, the submitter would be one of many who would value and appreciate access to living in Sydney.</p>	<p>Noted.</p>
20	<p>634 Botany Road & 45-51 Ralph Street, Alexandria</p>	<p>The proposed planning controls are accepted, understanding that the permitted uses won't be diminished. The preparation of a Planning Proposal for the Southern Employment Lands which includes</p>	<p>Noted.</p>

	<p>The subject sites are located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. They are currently zoned B6 and are proposed to be zoned B7. The sites are within the area proposed to be identified on Schedule 1 of the LEP which permits 'shop-top' housing as and additional permissible use.</p>	<p>the subject site demonstrates Council's willingness to introduce more permissible uses to these areas to reflect their changing nature and overcome the restrictions associated with the Standard Instrument LEP zones.</p>	
<p>21</p>	<p>1-3 Mandible & 151-163 Wyndham Street, Alexandria</p> <p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. The subject is currently zoned IN1 and is proposed to be zoned B7.</p>	<p>1. The proposed re-zoning of the precinct to B7 prohibits a range of land uses including residential that would be appropriately located in this precinct being highly accessible to Green Square. The sites are suitable for residential development and should be zoned accordingly to B4.</p>	<p>1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the he draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an</p>

	<p>2. There is a lack of detailed justification for the affordable housing requirements.</p> <p>3. The proposed B7 zoning approach contradicts the recommendations of Council’s 2013 Study prepared by SGS Economics and Council’s draft Strategy which both recommended these lands be zoned for mixed-use purposes B4. The later Economic Study does not appear to contradict the SGS Study or make recommendations about the approach in the Draft Strategy as being incorrect. As such this is not evidence based policy.</p>	<p>‘investigation area’ and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <p>2. The Program details a clear justification for the provision of affordable housing in the areas.</p> <p>3. The draft Planning Proposal and draft DCP implement the recommendations of the Study. While recognising the potential for a B4 zoning to permit residential development in limited areas of the employment lands, the Study articulates a clear vision for the zone as a ‘genuine mixed use precinct’ and makes a number of recommendations about what the zone should include and what should be achieved in developing new planning controls for it. Notably these recommendations include</p> <ul style="list-style-type: none"> • <i>Ensure that as the rezoning of these precincts creates increased land values, a portion of the value uplift is directed towards works or services aimed at achieving the objectives of Sustainable Sydney 2030.</i> • <i>Ensure the objectives of the zone achieve the vision for the zone by actively encouraging a genuine mix of affordable residential and non-residential uses.</i> • <i>Ensure the zone provides flexibility to support both employment and appropriate residential uses.</i> • <i>Undertake a character, heritage and urban design assessment of the proposed mixed use precincts, recognising that appropriate controls will need to be developed...</i> <p>While the Study provides the broader evidence for land use change and the principles as to what and where employment lands might be needed and accommodated in the future, in preparing statutory planning controls and establishing appropriate zonings a range of matters were taken into consideration, including, but not limited to:</p> <ul style="list-style-type: none"> • the recommendations of the Study; • NSW Government directions and projects; • the Directions and targets of <i>Sustainable Sydney 2030</i>; • submissions made to the public exhibition of the Background Paper, Study and draft Strategy; • the particular characteristics of sites, blocks
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			<p>and precincts;</p> <ul style="list-style-type: none"> • subdivision patterns; • environmental constraints; • existing uses and built form; and • the findings and recommendations of the various technical studies as attached to the planning proposal. <p>The statutory controls also needed to respond to the restrictions of the Standard Instrument (LEP) in achieving the City’s objectives and vision for the employment lands, a vision that cannot be achieved by generally permitting residential uses in the employment lands.</p> <p>Upon review of all relevant material is it clear the B7 zone, not the B4 zone, is the most appropriate zone to achieve these recommendations because:</p> <ul style="list-style-type: none"> • residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone; • market residential uses are also economically incompatible with the long term vision for the employment lands. The Economic Study, concludes that independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to value and developer demand. It finds that in the context of the LGA where residential uses are permitted within employment zones, the viability of non-residential uses is limited. A B4 zone would therefore undermine the goal of a ‘genuine mixed use precinct’; • the B7 zone will allow some residential to locate in the zone, specifically affordable housing; • market housing can be considered on a site by site basis with specific controls being developed to respond to the unique and often complex context of a site. The Strategy, which sits outside of the proposed statutory controls, recognises some potential for market residential in ‘investigation areas’ in the long term. The Guideline provides a framework for the consideration of site specific planning proposals planning where it would not unreasonably impact on the employment generating potential of the area and would
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	<p>4. The prerequisites for private residential development in the area are onerous and unreasonable, including that it occur by way of a site specific Planning Proposal and 50% of any new development be made available for affordable rental housing.</p> <p>5. The approach where a future planning proposal would need to be supported by the Director of Planning is unfair and unreasonable.</p> <p>6. By permitting only affordable housing in the B7 Business Park zone it is apparent that Council is intending to adopt an exclusionary zoning strategy. However Council has provided no evidence of instances where an exclusive zoning strategy has resulted in the provision of affordable rental housing as a consequence of community housing providers being able to purchase land at lower prices.</p> <p>7. The zoning strategy including the proposed densities appear to be a significant disincentive to re-development and if implemented would represent an opportunity lost for what is a strategically important area within walking distance (<800m) of the GSTC and associated railway station/bus interchange.</p> <p>8. The subject sites should be expressly excluded (deferred) from the Planning Proposal and any related amendments to the Sydney LEP be separately considered by Council.</p>	<p>contribute to the objectives of the employment lands.</p> <p>4. The subject site is proposed to be rezoned B7. This zone does not permit market residential development. As above, the Strategy recognises some potential for residential uses in the area in the long term and provides an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands, in particular those objectives that seek to provide affordable housing to a growing workforce.</p> <p>5. Where planning proposals requests are lodged by landowners and developers they are assessed by the City. Where a planning proposal request has merit a report and draft planning proposal would be prepared for consideration on Council and the CSPC. If the planning proposal is supported it is then referred to the Department of Planning and Environment for consideration for a Gateway Determination.</p> <p>6. Permitting affordable housing in the B7 zone has not been tried before and there is no empirical data about how successful the approach may or may not be. Notwithstanding this, the approach has the support of the Centre for Affordable Housing, multiple community housing providers and peak community housing bodies, who have stated an understanding of the dire under provision of affordable housing in the inner-city and the need for new and fresh approaches to be attempted. The success or the failure of the approach is unlikely to impact on the subject site.</p> <p>7. It does not follow that a zone that does not permit residential development is one where there is a 'disincentive' for redevelopment. The location of the subject site and its proximity to the Green Square train station makes the land equally attractive for commercial purposes, maximising opportunities for workers and customers to utilise public transport.</p> <p>8. It is unclear the intent of deferral of the sites from the draft controls. There is no undertaking from the City that a B4 zoning would be supported at a future time and deferring the sites would result in the retention of a IN1 zone in the middle of a 'higher order' zone, being the proposed B7. The B7 zone is significantly more</p>
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			<p>flexible, in terms of the uses that are able to locate in the zone, than the IN1 zone.</p> <p>Furthermore, the identification of the sites in the Strategy as within the 'investigation areas' presents an opportunity for a B4 zone provided the rezoning would contribute to the objectives of the southern employment lands. A planning pathway therefore exists to potentially achieve the residential outcomes proposed by the submission.</p>
22	<p>Moore Park Supa Centa</p> <p>The submission relates to the Moore Park Supa-Centa which is zoned B5 and is proposed to be identified on Schedule 1 of the LEP as having an additional permissible use of 1,000sqm of 'shops'.</p>	<ol style="list-style-type: none"> 1. The submitters are residents in the building sharing a boundary with the SupaCenta and understand there is no proposal to increase the height or bulk of the SupaCenta building. It appears that the proposed change of use is not significant. 2. Concerns relate to matters such as any increase in traffic, noise, pollution or changes to signage. Traffic has increased in Todman Avenue and it is difficult at times to exit Raleigh Park safely. Concerned that the proposed changes to the planning controls would worsen the situation with increased risks to safety, particularly of pedestrians trying to safely cross to the bus stops, cars trying to exit Raleigh Park and turn right to South Dowling Street or increased noise and pollution. 3. The extension of the operating hours or the increase in signage on the Todman Avenue façade or any space facing the golf course is not supported. 	<ol style="list-style-type: none"> 1. Noted. 2. The proposed planning controls are unlikely to result in increased traffic in and around the subject site. 3. The proposed planning controls do not result in an increase in the potential for signage on the Todman Avenue façade or any space facing the golf course.
23	<p>80 O'Riordan Street, Alexandria</p> <p>The subject site is located in the proposed B6 zone and within the area identified on Schedule 1 of the LEP which permits bulky goods and vehicle sales and hire premises as additional permissible uses. The site is currently zoned IN1.</p>	<ol style="list-style-type: none"> 1. The draft amendments to the DCP require a 10m landscaped setback requirement along the canal channel on the subject site. 2. While the longer term objective of creating a landscaped pedestrian and cycle connection along the channel is supported in principle, the setback requirement is inflexible and will significantly restrict any future re-development of the site. A landscape setback and pathway have already been constructed on the southern side of the concrete water channel and the imposition of a setback on the northern side is not considered essential. Council should provide some flexibility in the DCP to reduce the required setback in certain circumstances. 	<ol style="list-style-type: none"> 1. Provision 5.8.3.3 of the draft DCP requires a 10m setback area, as measured from the edge of the canal. The setback requirement is consistent with the setback in the current controls and the South Sydney DCP 1997 controls before that. 2. Sites can be bought, sold and redeveloped for a range of different purposes multiple times over a long period of time. The purpose of the DCP is to articulate the future vision for the public domain and pedestrian and cycle network of the southern employment lands. This allows the City to incrementally secure the parcels of land that may be needed in the longer term. While the setback on the subject site may not be achieved for some time, it remains the City's long term intent to provide a landscaped pedestrian and cycle connection along both sides of the channel.

		<p>3. There is no compensation or incentive associated with the setback. Adequate compensation should be provided in the Section 94 Plan or through FSR and/or height incentive.</p> <p>4. Council should provide assurance that future development applications for internal or external alterations will not 'trigger' the requirement for creation and dedication of the setback.</p>	<p>3. The identification of land for public domain allows for the orderly provision of infrastructure over time. It facilitates improved access through the area and in the long term will improve the amenity. The exhibited Planning Proposal included an incentive to encourage the dedication of land for a public road. Following consideration of this submission, it is recommended that the incentive be extended to sites that may dedicate land for other forms of public domain, including pedestrian and cycle paths, through site links and open space.</p> <p>4. The reasonableness of a land dedication is considered in the context of each development application as a matter of course.</p>
<p>24</p>	<p>Gardeners Road interface, Rosebery and Alexandria</p> <p>The submission relates to the interface between Sydney LGA and Botany Bay LGA.</p>	<p>1. A regional approach is required regarding traffic management as the traffic and transport issues given the major impacts on roads, public transport capacity and parking within the northwest of the Botany Bay LGA. A review of traffic influences on capacity and mode shift to include development transport impacts from both LGA's, as well as regional traffic influences, is supported. Reducing the mode share of the private vehicle should be targeted and initiatives should be undertaken to achieve that target. Further investigation into ways to support effective traffic management across LGA boundaries and in conjunction with RMS and Transport for NSW should be taken, including reasonable access to sustainable transport options, to better support the proposed clause 7.26 Sustainable transport in the southern employment lands.</p>	<p>1. It is agreed that from a strategic perspective, long term transport accessibility represents the biggest ongoing constraint to growth in the southern employment lands. It is essential that as new development occurs sustainable transport modes are encouraged and where possible the permeability of the employment lands be improved.</p> <p>It is acknowledged that actions that have the most potential to address the transport challenges in the area are the responsibility of the NSW Government, for example the provision of sufficient public transport. Notwithstanding this, local government has an important role in encouraging mode shift and managing road travel demand, for example, by limiting car parking.</p> <p>To achieve these ends, the Planning Proposal and draft DCP include a range of measures aimed at encouraging mode shift, including:</p> <ul style="list-style-type: none"> • continuation of the current approach in the Sydney LEP 2012 which establishes maximum parking rates (as opposed to minimums); • a finer grain road network to improve permeability and promote active transport modes; and • a requirement for Green Travel Plans that works towards mode shift targets in the draft DCP. <p>In addition, the City intends to undertake a review of on-street parking in the southern employment lands. It will also continue to</p>

	<p>2. There is concern that the increase in the number of roads connecting with Gardeners Road will have a detrimental impact on the capacity of Gardeners Road.</p> <p>3. The Strategy highlights the potential to establish Bourke Road and O'Riordan Street as the principal arterial roads through the strategy area. Council has concerns with these comments relating to Bourke Road, as these links connect into the Botany Bay LGA and if incorrectly managed may be an issue for the residential/pedestrian amenity within the Mascot Station Town Centre Precinct and jeopardise the function and pedestrian links. It should be noted that RMS through the Airport Masterplan are implementing O'Riordan and Robey Street as the arterial roads for the area.</p> <p>4. The southern employment lands are subject to flooding. Botany Bay Council agrees with the actions proposed and notes that corridor proposed along Alexandra Cannel has the potential to join up with Botany Bay LGA on the eastern side of the corridor.</p> <p>5. Botany Bay Council has ongoing concerns regarding the location of the remaining industrially zoned areas adjacent to Gardeners Road. The focus of "traditional industrial" land uses in this region presents a conflict with the changing higher density residential development that is occurring in the region through the Mascot Station Town Centre Precinct Area. Both heavy and general industry uses have potential to impact amenity in regard to noise, traffic, odour and extensive hours of operation on the adjoining residential dwellings.</p>	<p>strongly advocate improved public transport in conjunction with Botany Council.</p> <p>2. The current DCP identifies an additional road between Bourke and O'Riordan Streets that would connect with Gardeners Road, extending northward through the site. While the exact nature of this road has not yet been resolved, its purpose is to improve permeability through a number of large blocks and to provide an alternate route through the area for local traffic so that they are able to circulate in the area without being forced onto the major roads. The City will continue to liaise with Botany Council as planning for the road progresses.</p> <p>3. The re-prioritisation of Bourke Road and O'Riordan Street as the principal arterial roads through the area is mentioned in the City's reports as a potential unknown traffic and transport driver in the area, amongst others. Such a proposal would be the responsibility of RMS and Transport for NSW.</p> <p>The Planning Proposal or draft DCP does not elevate the importance of O'Riordan Street or Bourke Road in the existing road hierarchy.</p> <p>4. Noted.</p> <p>5. As is evidenced by the Study, industrially zoned land close to the City, the airport and the port continues to play a critical role in local and state economy as well as a practical role by ensuring inner City residents can continue to access service that generally require to locate in industrial zones. The rationale for continuing the recognise the IN1 zone in this area is:</p> <ul style="list-style-type: none"> • it consolidates heavier uses where they already exist; and • it provides good accessibility to airport and road networks, including the WestConnex interchange at St Peters, and therefore has potential to attract related freight and logistics uses. <p>While it is agreed that the interface between residential development and other uses is an important consideration in preparing new</p>
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<p>25</p>	<p>4-6 Bowden & 126 McEvoy & 128-130 McEvoy, Alexandria</p> <p>The subject site is located in the northern ‘investigation area’ which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. The subject site is currently zoned IN1 and is proposed to be zoned B7.</p>	<p>The subject site would be more appropriately zoned B4 because it has a dual frontage to Bowden Street and McEvoy Street.</p>	<p>It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the Strategy provides avenues for limited residential growth (both market and affordable) in ‘investigation areas’ where it would not unreasonably impact on the employment generating potential of the area and would</p>

			<p>contribute to the objectives of the employment lands.</p> <p>The subject site is located within an ‘investigation area’ and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p>
26	<p>Parramatta Road precinct</p> <p>The submission relates generally to the southern employment lands and more specifically to the Parramatta Road Employment Lands which are currently zoned IN2 and are proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 1. The area is flood prone and if Council believes in global warming it should not be rezoned. 2. All of the Crescent lands to the east should be rezoned as they are currently old terraces owned by the University and are creating stresses on the local environment. In addition there is concern that by permitting affordable housing that more low income residents would move to the area and add to the amenity issues observed with students living in the terrace houses to the east of the precinct. Prefers to see the whole area rezoned for residential to allow for the sensible redevelopment of the area. 	<p>The submitter was contacted by phone to seek additional clarification of the submission.</p> <ol style="list-style-type: none"> 1. The development typologies that are likely to result from the rezoning are unlikely to have additional impacts on climate change above those that may result if the land was not rezoned. 2. Additional discussion with the submitter confirmed he is concerned with the number of student and low cost accommodation because of the disrespect that he perceives the tenants show for the cleanliness and orderliness of the area. <p>The potential flooding impacts on new development will required to be mitigated at the time of development.</p> <p>The wider area is already zoned for residential purposes, excluding those lands within the Parramatta Road employment lands. It is suited for student accommodation given its proximity to the University. It is also suited for affordable housing given its proximity to services and public transport.</p>
27	<p>Sydney Airport</p> <p>The submission relates generally to the southern employment lands.</p>	<ol style="list-style-type: none"> 1. Sydney Airport commends the City for its approach to protect employment lands within the southern part of the City of Sydney LGA as they are essential to the efficient functioning of the City and ensure activities associated with key infrastructure like Sydney Airport can continue to locate in the LGA. 2. Sydney Airport is strongly of the view that aviation and aviation support-related land uses should be retained (where they currently exist), or encouraged in the future. However, the Standard Instrument LEP does not always specifically recognise aviation or aviation-support land uses. Council should clarify such land uses be permissible within both the IN1 and B6 zones. 	<ol style="list-style-type: none"> 1. Noted. 2. The City is required to prepare the land use table in an LEP in accordance with the Standard Instrument (LEP) and Department of Planning and Environment guidelines with Direction 5 of the Standard Instrument Land Use Table establishing the uses that may be included in a Land Use Table. While the City generally agrees that this approach can be constraining in dealing with unusual or ambiguous land uses, it has generally found that most proposals can fall inside one definition.

		<p>3. Heights in the employment lands should not exceed the Obstacle Limitation Surfaces (OLS) trigger of 51 metres.</p>	<p>It should be noted that the B6 and the IN1 zones have a different function in the context of the employment lands and therefore will not share the same land use table – with some uses being acceptable in one and not the other. The proposed B6 zone is designed to be flexible in the types of employment generating uses that can locate in the zone. It permits a range of industrial, business and retail activities, although the ‘general industrial’ uses are not permitted because of the potential impacts it may have on some of the more sensitive employment related uses, for example childcare, that will seek to locate in the zone. The IN1 zone is to generally ensure that industrial uses that need a place close to the City and/or airport and port, and cannot locate elsewhere, can be accommodated. All uses have been considered in the context of what their impacts may be on others that are permitted in the zone.</p> <p>In most cases, airport related activities will be able to locate in both zones, for example freight facilities, logistics and warehousing, educational facilities, catering facilities, and maintenance facilities. Office facilities may also locate in both zones, although only as an ancillary use in the IN1.</p> <p>Other activates, such as hotels and convention facilities might only locate in the B6 zone, in the main because of the potential land use conflict that would likely arise with general industrial activities.</p> <p>3. The draft planning proposal does not generally seek to increase maximum heights currently permitted under the Sydney LEP. The maximum building height currently permitted in the proposed B6 zone is 25 metres along Gardeners Road, potentially with some 15% increase in height where a design competition has been undertaken and there is land dedication for the purpose of public domain. This would not exceed the 51 metres Obstacle Limitation Surfaces (OLS) set to protect airspace.</p> <p>It is also noted that future planning proposals may be considered for additional height in the ‘investigation area’ in the south of the southern employment lands. In these instances, consultation will be undertaken with SACL.</p>
<p>28</p>	<p>6-8 Huntley Street, Alexandria</p>	<p>1. The City should identify key locations throughout the study area where residential could be permissible, including the subject site</p>	<p>1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely</p>

<p>The subject site is within the proposed B6 zone at the head of Alexandra Canal. The site is currently zoned B7 and proposed to be zoned B6.</p>	<p>and immediate surrounds to create a unique centre. Residential developments should include a proportion of affordable housing and live/work units to encourage the creative industries and small high-tech businesses.</p> <ol style="list-style-type: none"> 2. The subject site is currently zoned B7 which does not currently permit residential development, and proposed to be B6 that currently permits residential development but will not under the proposed changes. There appears to be some confusion about how the zones should be implemented and their intent and a complete about-face in how the zones are used and the results they will achieve. 3. It would be appropriate to allow the affordable housing provisions to be more flexible in the LEP amendment, rather than limiting the area to the B7 zone. This would also help avoid enclaves of social housing in the employment lands. Another interesting omission from the Study and Strategy is any reference to the potential for live /work units. 4. The draft DCP proposes to remove the requirement for active street frontages for the site. This is inconsistent with the requirement for setbacks for the walking paths and liveable green network. 5. The Study shows the area as included in a potential local centre. This reference has not been followed through and the site and locality has not been given any priority. It would be helpful if some information was provided by Council to show why the change in direction occurred. 	<p>to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <ol style="list-style-type: none"> 2. The City does not agree there is any widespread confusion about what is and is not permitted in the proposed zones. The Planning Proposal contains a proposed land use table for each zone together with a detailed justification for the proposed changes and description of the City's objectives. The proposed zones introduce an alternative planning approach to achieve the newly defined objectives of the City's employment lands. 3. Residential development of any nature, including affordable housing, is not supported in the proposed B6 zone for the abovementioned reasons and because of the impacts sensitive land uses such as residential can have on the operational viability of an employment zone. 4. Active frontages along Huntley Street were inadvertently removed from the exhibited maps and have now been reintroduced in the DCP maps. In reviewing the urban structure map in the DCP amendment, an active square has been identified to encourage active uses at the head of the Alexandra Canal to provide an inviting gateway to the pedestrian and cycle paths proposed along the Canal. 5. While providing an important input into the preparation of the Strategy, which was exhibited in 2013, final Strategy and draft controls, the intent of the Study was not to make a detailed analysis of each site and recommendations about the form and content of the statutory controls. Rather, the Study provides the broader evidence for land use change and the principles as to what and where employment lands might be needed and accommodated in the future.
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29	<p>94-98 O'Riordan Street, Alexandria</p> <p>The subject site is located in the proposed B6 zone and is immediately adjacent to, but not within, the area identified on Schedule 1 of the LEP which permits bulky goods and vehicle sales and hire premises as additional permissible uses. It is currently zoned IN1.</p>	<p>The John Newell Mazda motor showroom was established in 2010 and is located on the subject site towards the southern end of O'Riordan Street in an area where there are a number of motor showrooms and bulky goods retail outlets. The site is excluded from the current Schedule 1 listing that permits development in the B6 zone for the purpose of 'vehicle sales or hire premises'. There is no apparent reason for this exclusion and it is recommended that the boundary of the Schedule 1 area be extended to include the site.</p>	<p>The recommendation of the submission is supported.</p> <p>When introduced in the Sydney LEP, the intent of identifying in Schedule 1 an area for additional uses was to allow bulky goods and vehicle sales or hire premises so that they were not forced to rely on 'existing use rights' for the ongoing operation of their business. The subject land is currently used for a 'vehicle sales or hire premises' which was approved in 2008. Given the existing use and its long standing consent, it is reasonable to include it in the Schedule 1 area.</p>
30	<p>33-35 Morley Avenue, Rosebery</p> <p>The subject site is located in the south 'investigation</p>	<p>1. The current warehouse use is currently immediate bordered by residential development on the north and west edges of the site i.e. no roads separate the site from residential uses. The warehouse operates 7 days/week from 9.00am to 5.30pm. As well as the pick-up of goods by customers, the warehouse loading dock is serviced by semi-trailers and large rigid</p>	<p>1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p>

	<p>area' which is generally bound by Birminham Street, Ralph Street, Queen Street, Mentmore Avenue, Hayes Road, Rothschild Avenue, Harcourt Parade, Durdans Avenue, and Gardeners Road. It is currently zoned IN2 and is proposed to be zoned B7.</p>	<p>trucks. The proximity and overlooking by residential units creates land use conflict to which Council has contributed. The conflict places unreasonable and practical constraint on the operation of the warehouse. The zoning of the site should take a whole of street block approach. The site would be more appropriately zoned B4 and provide for a mix of residential and commercial/business uses. This would provide a proper transition to the adjacent business uses by using the street frontages of Morley and Dunning Avenues as the demarcation between zones.</p> <p>2. It is recommended Council defer the proposed rezoning of the Harvey Norman property in order to allow for the preparing of a concept plan to inform both the rezoning to B4 and the proper planning of the proposed through site link.</p>	<p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <p>2. It is unclear the intent of deferral of the sites from the draft controls. There is no undertaking from the City that a B4 zoning would be supported at a future time and deferring the sites would result in the retention of a IN1 zone in the middle of a 'higher order' zone, being the proposed B7. The B7 zone is significantly more flexible, in terms of the uses that are able to locate in the zone, than the IN1 zone.</p> <p>Furthermore, the identification of the sites in the Strategy as within the 'investigation areas' presents an opportunity for a B4 zone provided the rezoning would contribute to the objectives of the southern employment lands. A planning pathway therefore exists to potentially achieve the residential outcomes proposed by the submission.</p> <p>The City agrees that a fully resolved concept plan should inform the potential rezoning of the site. It is expected this would be prepared by the landowner and provided to the City in support of any site specific planning proposal request the landowner may wish to progress on the site.</p>
<p>31</p>	<p>Various</p>	<p>Link Housing's leasehold portfolio exists predominantly in the northern suburbs of Sydney</p>	<p>Noted.</p>

	The submission relates to the proposed affordable housing mechanisms within the employment lands.	and can fully appreciate the increasing demand for affordable housing for key workers in local communities. Link Housing supports the draft Planning Proposal and the key changes proposed including the zoning amendments, affordable housing contributions and the public domain and infrastructure requirements. In particular Link Housing supports the implementation of the three recommended mechanisms to maximise affordable housing.	
32	<p>5-9 Harcourt & 2-4 Durdans & 6-10 Durdans, Rosebery</p> <p>The subject site is located in the south 'investigation area' which is generally bound by Birminham Street, Ralph Street, Queen Street, Mentmore Avenue, Hayes Road, Rothschild Avenue, Harcourt Parade, Durdans Avenue, and Gardeners Road. It is currently zoned IN2 and is proposed to be zoned B7.</p>	<p>1. Council should amend Schedule 1 of the LEP to include a clause applying to the subject site to permit development for the purposes of shop top housing. It is recognised that the subject areas have become gentrified and it is for this reason that Council has proposed affordable housing at certain locations. Whilst we don't disagree with this approach, there should also be opportunities for unrestricted accommodation to cater for workers with higher incomes.</p> <p>2. It is requested Council consider an increase in FSR from 1.5:1 to 1.75:1 and maximum Building Height from 15m to 18m to the subject site. The additional height and FSR will assist in realising the potential for the shop top housing. This would be consistent with the land to the north along Harcourt Parade.</p>	<p>1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <p>2. Additional height and FSR is not supported at this time, though may be considered in the context of a future site specific planning proposal where there is adequate justification for increase.</p>
33	8 Hiles Street, Alexandria	1. The subject site should be zoned B4. The subject site is proposed to be rezoned from IN1 to B7	1. It is proposed that residential uses generally not be permitted in the southern employment lands

<p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<p>and a number of new land uses will be permissible on the subject site which will help achieve the objectives of the Planning Proposal. However residential uses can be supported on the subject site and in the surrounding area.</p> <p>2. Heights and FSRs should be increased as they would ensure viability of new uses. The City should undertake further investigations to increase the permissible height and FSR controls on the subject site and in fact other land holdings in the employment area.</p> <p>3. The City should investigate opportunities to allow retail development which is in close proximity to out of centre populations (such as the growing residential areas in Alexandria) to exceed 1,000sqm. It is considered that the 1,000sqm cap is alleviated for parts of the southern employment lands it would serve to unlock employment land which has been</p>	<p>for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone.</p> <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognise some potential for residential uses in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <p>2. Additional height and FSR is not supported at this time, though may be considered in the context of a future site specific planning proposal where there is adequate justification for increase.</p> <p>There is no apparent demand for widespread intensification of densities and heights in the employment lands. While some forms of industrial, business or retail activity may require larger envelopes, they are the exception and may be facilitated by a planning proposal or Sydney LEP 2012 Clause 4.6 variation where considered appropriate.</p> <p>3. The City is currently reviewing its retail strategies to consider recent development applications and a higher growth rate than expected in the GSURA. The result of the review would potentially lead to amendments to current planning controls.</p> <p>The City does not support a removal of the</p>
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		<p>typically low in employment generation per hectare.</p>	<p>1000sqm limit on retail ahead of a holistic review of retail provisions in current planning controls.</p>
<p>34</p>	<p>76 McEvoy & 2 Hiles Streets, Alexandria</p> <p>The subject sites are located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 1. The subject site should be zoned B4 Mixed Uses. The subject site is proposed to be rezoned from IN1 General Industrial to B7 Business Park and a number of new land uses will be permissible on the subject site which will help achieve the objectives of the Planning Proposal. However residential uses can be supported on the subject site and in the surrounding area. 2. Heights and FSRs should be increased as they would ensure viability of new uses. The City should undertake further investigations to increase the permissible height and FSR controls on the subject site and in fact other land holdings in the employment area. 3. The City should investigate opportunities to allow retail development which is in close 	<ol style="list-style-type: none"> 1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognises some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <ol style="list-style-type: none"> 2. Additional height and FSR is not supported at this time, though may be considered in the context of a future site specific planning proposal where there is adequate justification for increase. <p>There is no apparent demand for widespread intensification of densities and heights in the employment lands. While some forms of industrial, business or retail activity may require larger envelopes, they are the exception rather than the rule and may be facilitated by a planning proposal or Sydney LEP Clause 4.6 variation where considered appropriate.</p> <ol style="list-style-type: none"> 3. The City is currently reviewing its retail strategies to consider recent development

		<p>proximity to out of centre populations (such as the growing residential areas in Alexandria) to exceed 1,000sq. It is considered that the 1,000sqm cap is alleviated for parts of the southern employment lands it would serve to unlock employment land which has been typically low in employment generation per hectare.</p>	<p>applications and a higher growth rate than expected in theGSURA. The result of the review would potentially lead to amendments to current planning controls.</p> <p>The City does not support a removal of the 1000sqm limit on retail ahead of a holistic review of retail provisions in current planning controls.</p>
<p>35</p>	<p>4-6 Hiles Street, Alexandria</p> <p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 1. The subject site should be zoned B4 Mixed Uses. The subject site is proposed to be rezoned from IN1 to B7 and a number of new land uses will be permissible on the subject site which will help achieve the objectives of the planning proposal. However residential uses can be supported on the subject site and in the surrounding area. 2. Heights and FSRs should be increased as they would ensure viability of new uses. The City should undertake further investigations to increase the permissible height and FSR controls on the subject site and in fact other land holdings in the employment area. 	<ol style="list-style-type: none"> 1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <ol style="list-style-type: none"> 2. Additional height and FSR is not supported at this time, though may be considered in the context of a future site specific planning proposal where there is adequate justification for increase. <p>There is no apparent demand for widespread intensification of densities and heights in the employment lands. While some forms of industrial, business or retail activity may require larger envelopes, they are the exception rather</p>

		<p>3. The City should investigate opportunities to allow retail development which is in close proximity to out of centre populations (such as the growing residential areas in Alexandria) to exceed 1,000sqm. It is considered that the 1,000sqm cap is alleviated for parts of the southern employment lands it would serve to unlock employment land which has been typically low in employment generation per hectare.</p>	<p>than the rule and may be facilitated by a planning proposal or Sydney LEP Clause 4.6 variation where considered appropriate.</p> <p>3. The City is currently reviewing its retail strategies to consider recent development applications and a higher growth rate than expected in the GSURA. The result of the review would potentially lead to amendments to current planning controls.</p> <p>The City does not support a removal of the 1000sqm limit on retail ahead of a holistic review of retail provisions in current planning controls.</p>
36	<p>30-32 Bowden Street, Alexandria</p> <p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<p>1. Objects to the number of proposed land dedication/development constraints affecting the site which include a proposed 'required open space' (local park), 'proposed streets' and through site links. It is noted that just under half the developable area of the property is impacted on by these requirements. This is a significant burden and constraint on the extent to which the property can be redeveloped in a financially viable manner. It is of particular concern, that no direct discussions have been previously held with Harvey Norman despite the extent to which the property is affected.</p> <p>2. It is recommended that a property specific concept plan be prepared to address how best to accommodate Council's requirements in the design and siting of development and with a mix of land uses including residential that will support a viable redevelopment.</p>	<p>1. The planning controls, as they relate to the subject site, have included requirements for open space and proposed streets since the introduction of the 2012 Sydney LEP and DCP. The draft DCP does not impose any additional requirements on the site from those that exist in the current controls, other than an additional through site link to assist with permeability through a large site.</p> <p>Given these are in the main existing controls the City did not consider specific consultation was required ahead of the draft Planning Proposal and DCP being reported to Council and the CSPC in June 2014. It is noted that during the exhibition period the City met with the landowner and their consultant to discuss their concerns.</p> <p>While the City acknowledges the land dedication requirements that affect this site are significant, under the current planning controls additional FSR can be achieved on the subject site above the maximum in the FSR map where there is contribution to 'community infrastructure' as defined in the LEP, and to this extent the dedication is incentivised. Provision of the 'local park' can attract a deduction from public open space contributions under the Section 94 Contributions Plan. It is likely the dedication requirements would not preclude the full development potential (FSR) of the site being achieved.</p> <p>2. The City agrees that a fully resolved concept plan should inform any potential rezoning of the site. It is expected that this would be prepared by the landowner and provided to the City in support of any site specific planning proposal request the landowner may wish to progress on the site.</p>

<p>37</p>	<p>154 Euston Road, Alexandria</p> <p>The subject site located in the IN1 zone in the south-west of the southern employment lands. Rezoning of the site is not proposed.</p>	<ol style="list-style-type: none"> 1. Industrial land uses are still present in this area and provision for their continued operation should be safeguarded. Concrete is essential to a broad range of projects fundamental to economic growth, in particular the Green Square and Mascot Town Centres and the WestConnex motorway project. It is recommended that further encroachment of the B6 zoned area such that impacts on the efficient operation of industries in the IN1 zoned area would not be appropriate in this location. 2. Objects to the proposed DCP which seeks to introduce a new street through the site. Given the location of the proposed through site link, in the middle of the industrial area, and the nature of the surrounding area, it is unclear why any through-site link is required in this area. The inclusion of a through site link at the location proposed would require the removal of part of a building that is intended to be adapted and retained, and would seriously undermine the future development potential of the Site. 	<ol style="list-style-type: none"> 1. It is agreed there is still a strong demand and purpose for industrial land uses in the City. Notwithstanding, the Study provides strong evidence for the reduction of the amount of land zoned for industrial purposes and a commensurate increase in the amount of land zoned for flexible employment uses, including areas where some residential development may be suitable. <p>The Planning Proposal includes an additional objective in the B6 zone land use table which reflects the intent and purpose of the zone being to protect the ongoing viability of the industrial zone.</p> 2. While the predominantly industrial nature of the area is recognised, this does not negate the need to introduce measures to improve permeability and access through a highly constrained area. In the case of the proposed road affecting the subject site it is the most desirable location because of its proximity to the proposed road across the canal and it will facilitate a timely exit from the linear strip of open space and cycle path along the western edge of the canal to the site on the western wedge of Euston Road and to Sydney Park. <p>Identification of the road does not require immediate dedication of land to the City nor does it force the removal of any existing building. The reasonableness of a land dedication requirement is considered in the context of a development application. If the application is to adaptively reuse an existing building in the path of the road, dedication may not be required.</p> <p>No area stays the same over time. Sites can be bought and sold and redeveloped for a range of different purposes multiple times over a long period of time. The purpose of the DCP is to articulate the future vision for public domain and roads. This allows the City to incrementally secure the parcels of land that may be needed in the longer term.</p> <p>This approach was taken in the GSURA where in the late 1990's the planning controls identified a future road network when the area was rezoned from industrial to mixed uses. This approach has resulted in considerable improvement to a road network that needed to respond to a new predominant use.</p>
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38	<p>Various</p> <p>The submission relates to the proposed affordable housing mechanisms within the employment lands.</p>	<ol style="list-style-type: none"> 1. Endorses the Council’s approach to the delivery of additional affordable housing as set out in the draft Program. Supports the strong rationale set out in the DCP and the Program about the increasing difficulties facing very low, low and moderate income earners to find suitable affordable rental housing in the inner city given the rising costs associated with rental housing. Agrees with the emphasis on the social and economic impacts this shortage has, particularly in relation to low paid or key workers that are so critical to the functioning of a sustainable city. 2. Commends the approach taken to try to diversify the options for the delivery of affordable housing in the employment lands, whilst ensuring that the units are provided in perpetuity and are managed by an eligible CHP and supports the process for the allocation of ‘in kind’ or ‘in lieu’ contributions set out clearly in the draft Program. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted.
39	<p>44-54 O’Riordan Street, Alexandria</p> <p>The subject sites are located in the proposed B6 zone where the employment lands meet the suburb of Beaconsfield. They are currently zoned IN1.</p>	<ol style="list-style-type: none"> 1. While there is no objection to the proposed rezoning from the current industrial zone to B6, considers the character and location of the properties is better characterised as mixed use. As a long and narrow parcel with limited depth, the land has an extended address to both the commercial corridor of O’Riordan Street and the mixed use neighbourhood of Beaconsfield to the east. This is a unique circumstance that warrants a planning and zone response that can properly manage these edges and transition in character. 2. The draft Planning Proposal is based on the area historically zoned industry being a legacy of old industrial zones no longer relevant to 	<ol style="list-style-type: none"> 1. The Study identifies the proposed B6 zone as critical employment land necessary to support the growth of the airport and to facilitate other employment generating uses. To protect the employment generating potential of these employment lands, it is proposed that residential uses be strictly prohibited in the B6 zone for a range of reasons. <p>Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>An additional objective is proposed in the B6 zone land use table which reflects the intent and purpose of the zone being to protect the ongoing viability of the industrial zone.</p> <p>For the above reasons the City does not support any encroachment of residential development into the proposed B6 zone.</p> 2. Ensuring sufficient land for future employment growth remains a critical planning issue to the City and to the NSW Government.

		contemporary planning issues applicable to this fringe or edge location that arguably has more in common with the existing and emerging mixed use/Green Square fringe of the adjoining lands in the neighbourhood to the immediate east and north of the land. The site has potential to be a significant contributor to the urban renewal underway south of Green Square and positive planning change.	While the urban renewal of the GSURA plays an important role in facilitating residential development for the City's growing population, it must also ensure that in the long term it will be a well-functioning urban environment where residents have access to services and jobs. This is the role the employment lands play in the wider context of urban renewal of the City south.
40	Various The submission relates to the proposed affordable housing mechanisms within the employment lands.	Supports Council's intension to provide affordable housing within the employment zone, where the proposed tenants will benefit greatly from working and living within the same community. By increasing the density to some areas and the utilisation of the Affordable Housing SEPP, this will enable CHP's to provide diversity of housing and also opportunity to the cliental that fits within the tenants needs.	Noted.
41	134 Dunning Avenue, Rosebery The subject site is located in the south 'investigation area' which is generally bound by Birminham Street, Ralph Street, Queen Street, Mentmore Avenue, Hayes Road, Rothschild Avenue, Harcourt Parade, Durdans Avenue, and Gardeners Road. It is currently zoned IN2 and is proposed to be zoned B7.	1. The changes should provide development incentive in the B7 zone for land /lot/site consolidation that includes the same residential development opportunities as in the B4.	1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth. Notwithstanding this, the draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands. The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific

	<p>2. Owners should be compensated for land devaluation when Council proposes or constructs a bike path across the streetscape entry of the site.</p> <p>3. The financial validity of public/ affordable housing should be audited for viability. The contributions, taxes and fees imposed on land owners in by Council in the proposed zone towards public / affordable housing should be capped ensuring the landowner’s development viability and or contributions be reduced according with high quality design and build.</p> <p>4. A combination of affordable and B4 zone residential development should be permitted in the B7 zone in consideration of site consolidation.</p> <p>5. Car parking numbers (rates) must be significantly increased to allow for a greater number of car spaces be permitted both on site and on street.</p>	<p>planning proposals.</p> <p>2. The City has no evidence that the value of land is reduced as a consequence of bike paths. Congestion and access constraints are the biggest impediment to growth in the southern employment lands. Improving pedestrian and cycle movement throughout the employment lands is critical to ensure that over time the transport mode shift to sustainable forms of travel, such as walking and cycling, can be achieved.</p> <p>3. The need for affordable housing to support employment lands is well established as both a social and economic imperative for the inner-city. The City agrees that the ongoing viability of development is a critical consideration however other social and economic values of affordable housing are an important consideration of its wider contribution to a sustainable urban environment.</p> <p>The contribution established by the draft controls and the Program sets a rate with reference to:</p> <ul style="list-style-type: none"> • the affordable housing needs analysis; and • the long term successful operation of the <i>Green Square Affordable Housing Program</i> that currently operates in the GSURA which overlaps the southern employment lands in the north. <p>As in the GSURA, it is highly unlikely that the contribution would have detrimental impact on the viability of development given the potential land values increasing in response to the proposed rezoning. By including the requirements in planning controls now, future land owners and prospective purchasers will be forewarned of the expected contribution and it will be factored into the land value accordingly.</p> <p>4. Where a site is located in an ‘investigation area’ a B4 zoning may be appropriate where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands, including the provision of affordable housing.</p> <p>5. To assist in managing parking demand and congestion in the southern employment lands, the current approach in the Sydney LEP which establishes maximum parking rates is maintained by the draft Planning Proposal. In</p>
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			<p>the main, the southern employment lands are currently identified as Category C on the Land Use Transport Integration Map (LUTI map), which guide parking rates for residential development, and Category F on the Public Transport Accessibility Level Map (PTAL map), which guides parking rates for non-residential development. Category C and Category F have the lowest accessibility ratings and thereby allow for the highest parking rates available in Sydney LEP.</p> <p>Increasing parking rates would only contribute to the substantial congestion issues experienced in the southern employment lands.</p>
42	<p>69 Bourke Road, Alexandria</p> <p>The site is located in the proposed B6 zone. It is currently zoned IN1.</p>	<ol style="list-style-type: none"> 1. The proposed zone objectives and permitted land uses in the B6 zone are overly restrictive and will limit development opportunities and investment in the area. The B6 zoning should retain the existing B6 land use table, and objectives, of Sydney LEP, being those typical of similarly zoned land throughout NSW, as is the intention of the Standard Template planning process 2. The objective of the B6 zone is to 'ensure uses support the viability of the adjoining IN1 zone' is very restrictive and onerous, and reduces the nature of future employment uses in the B6 zone to little more than service activities. 3. The land use table needs to include a wider range of retail uses (at least to be the same as the IN2 zone as minimum) with uses to include restaurants, entertainment and retail. In addition the proposed restrictive scope of land uses prevents employment land uses that would operate in the evening. The land use table should permit additional forms of supporting employment (evening-oriented) land uses along the frontage of the arterial roads, including Bourke Road, to create an active frontage along this corridor. 	<ol style="list-style-type: none"> 1. The proposed B6 land use table has comparable flexibility to the current B6 zoning, although it does not permit shop-top housing, and is considerably more flexible than the IN1 zone that currently applies to the subject site. The uses that are mandated as permissible in the Standard Instrument are included in the proposed B6 zone. The decision about the appropriateness of including residential in the zone is left to the discretion of the responsible planning authority, in this case Council. 2. The Study supports the reduction of the current IN1 zone in the context of a flexible employment zone that acts as a 'buffer' to the more sensitive current B4 and proposed B7 zones. Notwithstanding, the B6 zone is in itself flexible and facilitates a range of industrial, business and retail uses which are unlikely to have an impact on the viability of the proposed IN1 zone. Where the proposed objective may be a relevant consideration is where a sensitive employment use is being proposed immediately adjacent a relatively heavy industrial use, such as a child care centre. In this instance a development application may need to demonstrate how it will not have a detrimental impact on existing industrial uses. 3. The IN2 zone is proposed to be deleted from the Sydney LEP as it is not proposed anywhere within the employment lands or within the LGA. The current and proposed industrial zone do not generally permit retail uses, except for some forms of retail development, such as food and drink premises in a limited scale. <p>The B6 land use table does not restrict food and drink premises, entertainment facilities or any other form of evening related activity. It generally permits most forms of retail, including</p>

	<p>4. The land use table needs to provide for some residential development, even if it is either of restricted nature (i.e., serviced apartments; affordable housing, and limited in unit size and/or mix) to allow persons servicing the employment land uses, visiting employees, or wishing to live close to their place of employment.</p> <p>5. Despite the intention to allow 'depots' (approved on land to the rear) to remain a permissible use, the longer term urban design benefits from having industrial development fronting Alexandria Canal is questioned. The DCP makes clear that a recreational corridor remains an objective along the canal. However, if the uses that front the canal are not non-active, are closed in the evenings and weekend, and do not have a positive appearance, the canal frontage will continue to be challenging, isolated and unfriendly to pedestrians and cyclists. It is recommended that the IN2 zoning on land to the rear, at least for the length of the canal, be zoned B6.</p> <p>6. The floor space and height incentives should be included in the LEP or DCP controls to encourage employment opportunities. An incentive of 1:1 FSR and a height of 22m is recommended. The building heights along the canal should not facilitate greater intensity than that facing Bourke Road.</p> <p>7. An incentive should be in place for the land to be dedicated or acquired along the canal so that the cycle way can be achieved or the park to be created.</p>	<p>shops of up to 1000sqm of floor space.</p> <p>4. As mentioned above, the Study identifies the proposed B6 zone as critical employment land necessary to support the growth of the airport and to facilitate other employment generating uses. To protect the employment generating potential of these employment lands, it is proposed that residential uses be strictly prohibited in the B6 zone for a range of reasons.</p> <p>Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>5. Zone IN1 is proposed in the southern stretch of the eastern side of the canal. The intent is to ensure adequate industrial zoned land as identified in the Study, and to reflect approved depot uses that exist along the canal. While the limited activation that depot uses may afford the canal edge is understood, it is also noted that ensuring depot uses can locate close to the population they serve is critical.</p> <p>6. There is no notable demand for widespread intensification of densities and heights in the employment lands. While some forms of industrial, business or retail activity may require larger envelopes, they are the exception and may be facilitated by a planning proposal or Sydney LEP Clause 4.6 variation where considered appropriate.</p> <p>7. The City and/or the Sydney Water Corporation own a significant amount of land along the eastern edge of the canal which will assist in achieving the linear park/cycle way in future. Setback requirements are in place and where there is opportunity Council will continue to seek the dedication of land for remaining</p>
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		8. Section 6.2.2 of the DCP should be retained and incorporated into Section 2.10.2.	sections. 8. The substance of current controls at Section 6.2.2 of the DCP is retained in the proposed DCP.
43	<p>Various - Ports</p> <p>The submission relates generally to the proposed zoning in the southern employment lands.</p>	<p>1. The industrial lands located in the LGA are valuable to Sydney and the broader region not only because of their proximity to Port Botany, Sydney Airport, major road and freight rail networks but also due to the size of the land area/ cluster. Ensuring such lands are operationally unconstrained (i.e. able to operate 24 hours, 7 days a week, allow for appropriate truck and delivery access, and are not restricted by sensitive adjoining uses such as residential will help support the freight and logistics network and cater for future trade growth. Supports proposed amendment to the zone objectives for the B6 zone which aims to ensure incompatible industrial land uses (e.g. sensitive uses such as residential accommodation) are not developed in close proximity to traditional industrial lands and/or uses.</p> <p>2. The DCP should contain provisions that reinforce the LEP by incorporating requirements that ensure sensitive uses do not compromise the economic viability of the remaining industrial lands and also to ensure adjoining uses are compatible with industrial uses. The DCP should ensure development is designed and operated to allow 24 hour, 7 days a week industrial operations and truck/vehicle access, and that new development does not limit the operation of approved truck routes. Recognition of 24 hour/7 days a week traffic movements is also required and needs to be considered as part of the design and operation of non-industrial developments.</p>	<p>1. Noted.</p> <p>2. While there is no requirement by the City that existing industrial uses move out of the area, it is recognised that sensitive land uses have the potential to impact on the long term viability of existing industrial activities.</p> <p>The exhibited draft Planning Proposal and DCP include provisions to ensure that existing uses are considered in any application. Some additions are recommended to the clause that permits affordable housing in the B7 zone following consideration of this submission. Changes to LEP provisions are to specifically consider hours of operation and truck access requirements of existing and approved employment uses and the health and wellbeing of future residents.</p> <p>Changes are also proposed to the draft DCP to explicitly reference the need to protect approved truck routes.</p>
44	<p>494-504 Gardeners Road, Rosebery</p> <p>The subject site is located in the proposed B6 zone and is immediately adjacent to, but</p>	<p>1. Supports the proposed rezoning (at least in the short term) because it facilitates a flexible approach to land use by permitting a range of employment generating activities in response to identified demands, and the current uses and bulky goods corridor appropriately recognises that land use change in this area will occur over time.</p> <p>2. In the long term, a mixed use zoning (including</p>	<p>1. Noted.</p> <p>2. The Study identifies the proposed B6 zone as</p>

<p>not within, the area identified on Schedule 1 of the LEP which permits bulky goods and vehicle sales and hire premises as additional permissible uses. It is currently zoned IN1.</p>	<p>residential) is more appropriate given that it is walking distance to the Mascot Train Station and there is already high density residential development on the opposite side of Gardeners Road, which is part of the future Mascot Station Urban Activation Precinct (UAP) within which even higher density residential development will be investigated. The zoning should be revisited once the Mascot Station UAP process is recommenced and the traffic implications of WestConnex on Gardeners Road are known.</p> <p>3. It is not clear how much additional height or FSR may be granted if both the new road clause (proposed 6.22) and design excellence clause (6.21) apply to a development. The clause is inequitable if a site that is subject to both clauses cannot have access to both bonuses and creates no additional incentive to dedicate the road.</p>	<p>critical employment land necessary to support the growth of the airport and to facilitate other employment generating uses. To protect the employment generating potential of these employment lands, it is proposed that residential uses be strictly prohibited in the B6 zone for a range of reasons.</p> <p>Residential uses are environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>An additional objective is proposed in the B6 zone land use table which reflects the intent and purpose of the zone being to protect the long term viability of the industrial zone.</p> <p>For the above reasons the City does not support any encroachment of residential development into the proposed B6 zone now or in the foreseeable future.</p> <p>3. The draft Planning Proposal indicates there are three height/floor space incentives that may apply in the employment lands:</p> <ul style="list-style-type: none"> • the design excellence clause (Clause 6.21) that applies where development is over 25 metres in height, has a capital value of more than \$100 million, is located in the B6 or B7 zone and/or is a site of more than 5,000sqm and proposes a predominantly commercial use; • the community infrastructure scheme (Clause 6.14), that currently applies in land located within the GSURA; • the proposed incentive for public domain dedication (proposed Clause 6.22), that is to apply to land in the proposed B6 zone, where it is not located in the GSURA, and where the City identifies a need for dedication of land for public domain. <p>4. Following public exhibition and further consideration of the proposed Clause 6.22, changes are proposed to better achieve the</p>
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	<p>4. To implement the new road clause (6.22), it is assumed Council would impose a condition of consent requiring the dedication of land. A fundamental issue with this is that a consent authority does not have the power to impose conditions of consent under section 80A requiring the dedication of land free of charge or the payment of monetary contributions.</p> <p>5. Dedicating land to Council free of cost would be a very costly exercise to the land owner.</p> <p>6. Council should incorporate the proposed road network identified in the draft DCP Streets and Lanes Map into the City of Sydney Development Contributions Plan 2006 and offset the value of</p>	<p>stated objective of the clause, which is to encourage the timely delivery of infrastructure to support growth in the employment lands. Proposed changes include:</p> <ul style="list-style-type: none"> • broadening the application of the clause to apply to all sites where land may be dedicated for public domain, not only public roads. This is following consideration of a number of submissions that identified concerns about the impact that the range of requirements for public domain may have on development potential of certain sites; • where design excellence applies, reduce the incentive to up to 5% additional height or additional floor space, but allow the addition to be achieved together with additional height or floor space under the Sydney LEP Clause 6.21 - Design Excellence. The design excellence clause allows up to 10% additional height or floor space to be achieved where a development achieves design excellence. • Where design excellence does not apply, provide up to 15% additional height or additional floor space incentive; • exclude areas in GSURA, where the provision of community infrastructure is incentivised by Clause 6.14. <p>4. The general approach of the new road clause is to work in a similar way to the community infrastructure scheme in the GSURA (clause 6.14). The dedication of land is voluntary. If the proponent sought to utilise the additional floor space or height, the proponent would enter into a planning agreement with Council for the dedication of the land.</p> <p>5. It is noted that the dedication of land does not preclude the full development potential (FSR) of the site being achieved. For example a 1000sqm site with an FSR of 1:1 could still achieve 1000sqm of GFA, even though some of the land may be required for a road. Where this is the case, the development potential of the dedicated land is zero and the value of the land is therefore much less.</p> <p>Notwithstanding this, the potential to achieve 15% additional height or floor space is of substantial benefit to a landowner.</p> <p>6. The purpose of the proposed FSR/height incentive is to offset the value of land that is dedicated through the development application</p>
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		<p>the dedicated land against section 94 contributions. Where the value of the dedicated land will exceed the contributions that would be levied under the Contributions Plan, applicants should be further compensated with additional floor space and/or height in addition to that which is achievable under the design excellence clause (6.21).</p>	<p>process. The development capacity of any site is not diminished by land dedication, as the FSR of any dedicated land is still achievable on the remainder of the site, and as such the development capacity of dedicated land is nil. Given that land value reflects development capacity, the value of dedicated land is generally low and easily offset by the additional FSR and height that can be achieved with the proposed incentive.</p> <p>It is also noted that the floor space/height incentive has been established as being supportable in the context of the existing and future built form following careful urban design analysis. The awarding of an undefined amount of floor space/height to compensate for perceived losses is not supported by the City.</p>
<p>45</p>	<p>8-22 Bowden Street, Alexandria</p> <p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<ol style="list-style-type: none"> 1. The City issued two planning proposals, with the first allowing residential uses and the second removing residential as a permissible land use. 2. The subject site is an excellent candidate for higher density (residential) transit oriented development. Built form analysis has concluded that a building height of 28m and an FSR range of 3.5:1 for the site would have been acceptable. 	<ol style="list-style-type: none"> 1. The draft Planning Proposal is the only planning proposal that has been prepared, adopted by Council and the CSPC for public exhibition, received a Gateway Determination from the NSW Government and publicly exhibited. <p>In 2013 the City exhibited a draft Strategy, the introduction of which clearly marked it as a draft Strategy that was being released for the purpose of consultation and discussion and ideas generation with stakeholders who may have an interest in the development of later planning controls. The draft Strategy, the associated Council and CSPC resolutions that facilitated its exhibition and the supporting public exhibition notifications all noted that the draft Strategy had no statutory weight.</p> <p>The draft Strategy in no way constituted a statutory planning proposal.</p> <ol style="list-style-type: none"> 2. Following more detailed work, it is proposed that residential uses generally not be permitted in the southern employment lands. <p>Notwithstanding this, the draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone</p>

		<p>3. The submission considered only the façade of the existing building of heritage significance. It proposed a new building height and FSR controls for the subject site stating they were acceptable and would not adversely impact upon the heritage significance subject to a suitable building design.</p> <p>4. Further assessment of the modal split data (transport data) concludes the transition of this area from only employment uses to a mix of commercial and residential uses would result in a significant reduction in car trips which would result in improved road network operation and increased usage of public transport.</p> <p>5. Economic analysis found the increase in density to the site would assist Council to achieve its residential and employment targets of the sub-regional strategy.</p>	<p>may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <p>3. The <i>City of Sydney Industrial and Warehouse Buildings Heritage Study</i>, which was reported to Council and the CSPC in October 2014, included review of existing heritage items in the southern employment lands. The study recommends a number of exiting items be retained, concluding that the buildings continues to contribute to an understanding of the industrial history of the area. Despite some of modifications and changes required to accommodate their adaptive reuses, the items maintain most of their external integrity and overall characteristics of their respective historical period in discernible manner.</p> <p>4. The basis for analysis and the evidence provided in the submission for this assertion is insufficient to draw such a conclusion about future car use.</p> <p>5. The City’s analysis of recent and projected growth shows substantial progress towards the residential targets established by the NSW Government’s metropolitan planning strategies. There are however ongoing concerns with the impact that encroaching residential may have on employment generating lands and the City’s long term potential to facilitate ‘out-of-centre’ opportunities for new business and employment growth. Where sites are considered for site specific planning proposals in the future, the retention of employment will be a key consideration for the City.</p>
<p>46</p>	<p>23 O’Riordan Street, Alexandria</p> <p>The subject site is part of the area referred to as the ‘excluded’ lands which are generally bound by McEvoy Street, Bowden Street, Bourke Road, O’Riordan Street, and the Sydney</p>	<p>The height and FSR standard recommended in the draft LEP for the site maybe appropriate for an industrial zoned site, however the draft 15m height and 2:1 FSR is not considered to be an appropriate built form for a zone envisaging white collar employment uses. The subject site would more appropriately have a height control of at least 18 metres and an FSR of 3:1.</p>	<p>The proposed B6 zone is to facilitate a wide range of uses including industrial, business and retail. Higher density employment is generally to be encouraged, and is more likely to seek to locate in the proposed B7 zone where there is better access to public transport and services and amenities.</p> <p>There is no notable demand for widespread intensification of densities and heights in the B6 zone and IN1 zones. While some forms of development may require larger envelopes, they are the exception and, if deemed appropriate, may be facilitated by a planning proposal or Sydney LEP Clause 4.6 variation where considered appropriate.</p>

	Water easement and are currently zoned 10(e) or 10(d). The subject site is currently zoned 10(d) and is proposed to be zoned B6.		
47	<p>Various</p> <p>The submission is from Goodman, a significant land owner in the southern employment lands. It relates to various sites throughout the area.</p>	<p>1. The proposed changes are inconsistent with the key findings of independent studies commissioned by Council to form the evidence base for the proposed new planning framework for the southern employment lands. The proposed zoning of land within the southern employment lands to B7 should be B4 which is a more appropriate zoning as recommended in the SGS Study which applied a B4 zoning to these lands. Failing a B4 zoning, the B6 land use table should allow 'shop top housing' as a permissible form of development.</p>	<p>1. The draft Planning Proposal and draft DCP implement the recommendations of the Study. While recognising the potential for a B4 zoning to permit residential development in limited areas of the employment lands, the Study articulates a clear vision for the zone as a 'genuine mixed use precinct' and makes a number of recommendations about what the zone should include and what should be achieved in developing new planning controls for it. Notably these recommendations include</p> <ul style="list-style-type: none"> • <i>Ensure that as the rezoning of these precincts creates increased land values, a portion of the value uplift is directed towards works or services aimed at achieving the objectives of Sustainable Sydney 2030.</i> • <i>Ensure the objectives of the zone achieve the vision for the zone by actively encouraging a genuine mix of affordable residential and non-residential uses.</i> • <i>Ensure the zone provides flexibility to support both employment and appropriate residential uses.</i> • <i>Undertake a character, heritage and urban design assessment of the proposed mixed use precincts, recognising that appropriate controls will need to be developed...</i> <p>While the Study provides the broader evidence for land use change and the principles as to what and where employment lands might be needed and accommodated in the future, in preparing statutory planning controls and establishing appropriate zonings a range of matters were taken into consideration, including, but not limited to:</p> <ul style="list-style-type: none"> • the recommendations of the Study; • NSW Government directions and projects; • the Directions and targets of <i>Sustainable Sydney 2030</i>; • submissions made to the public exhibition of the Background Paper, Study and draft Strategy; • the particular characteristics of sites, blocks

			<p>and precincts;</p> <ul style="list-style-type: none"> • subdivision patterns; • environmental constraints; • existing uses and built form; and • the findings and recommendations of the various technical studies as attached to the planning proposal. <p>The statutory controls also needed to respond to the restrictions of the Standard Instrument (LEP) in achieving the City’s objectives and vision for the employment lands, a vision that cannot be achieved by generally permitting residential uses in the employment lands.</p> <p>Upon review of all relevant material is it clear the B7 zone, not the B4 zone, is the most appropriate zone to achieve these recommendations because:</p> <ul style="list-style-type: none"> • residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone; • market residential uses are also economically incompatible with the long term vision for the employment lands. The Economic Study, concludes that independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to value and developer demand. It finds that in the context of the LGA where residential uses are permitted within employment zones, the viability of non-residential uses is limited. A B4 zone would therefore undermine the goal of a ‘genuine mixed use precinct’; • the B7 zone will allow some residential to locate in the zone, specifically affordable housing; • market housing can be considered on a site by site basis with specific controls being developed to respond to the unique and often complex context of a site. The Strategy, which sits outside of the proposed statutory controls, recognises some potential for market residential in ‘investigation areas’ in the long term. The Guideline provides a framework for the consideration of site specific planning proposals planning where it would not unreasonably impact on the employment generating potential of the area and would
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	<p>2. The draft controls should be amended to allow a broader range of retail uses which are suited to the southern employment lands and that the 1,000sqm retail restriction applying to the southern employment lands be increased to 2,000sqm to ensure that such uses can be accommodated.</p> <p>3. The proposed amendments do not provide sufficient catalyst for renewal and seek to impose unviable costs on new development which will stifle redevelopment and result in further degradation of the area.</p>	<p>contribute to the objectives of the employment lands.</p> <p>2. A 'cap' of 1000sqm for 'shops' applies to land within the Restricted Retail Development area identified in the Sydney LEP. DCP controls also apply and provide additional guidance about the interpretation of the LEP clause. The controls are to ensure that major retail locates in centres, where there is adequate infrastructure planned. The controls are informed by significant research being the <i>Green Square and Southern Areas Retail Study 2008</i> and the <i>Minor Retail Development in Green Square and the Southern Areas 2010</i>.</p> <p>The City is currently reviewing its retail research to consider recent development applications and a higher growth rate than expected in GSURA. The review will examine the cap and establish whether there is a need for additional centres and retail areas in the south of the LGA. The result of the review could potentially lead to amendments to current planning controls.</p> <p>Amendment to the planning controls that implement the City retail policies ahead of a holistic review of retail provisions in current planning controls is not supported.</p> <p>3. The proposed rezoning is a significant change for the employment lands. Where they are now predominantly in a highly constrained industrial zone, it is proposed that the majority of the area be zoned for more flexible employment uses, which includes office and retail uses where they are currently not permitted. This creates significant potential for change over the next 20 years as is evidenced by the Economic Study.</p> <p>There is no evidence to suggest that the proposed contribution towards affordable housing proposed in the Planning Proposal would result in unviable development and urban degradation.</p> <p>The need for more affordable housing to support employment lands is well established as both a social and economic imperative for the inner-city.</p> <p>Notwithstanding this, the City agrees that the ongoing viability of development is a critical consideration under any planning scheme. With regard to the contribution established by the draft controls and Program, the rate has been established with reference to:</p>
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	<p>4. The infrastructure and services required to service new development as proposed under the draft changes has not been identified, costed or funded. Further, the scale of infrastructure investment required could not be adequately funded under the proposed development scenario. A detailed Infrastructure Plan, including costing and funding mechanisms should be prepared for the employment lands and exhibited in conjunction with any proposed planning amendments.</p> <p>5. The proposed changes pre-empt the planning outcomes that may result following the release of the Metropolitan Strategy for Sydney 2031 (currently draft) and Subregional Plans which will establish strategic directions and targets for the future of the employment lands.</p>	<ul style="list-style-type: none"> • the affordable housing needs analysis; and • the long term successful operation of the <i>Green Square Affordable Housing Program</i> that currently operates in the GSURA which overlaps the southern employment lands in the north. <p>As in the GSURA, it is unlikely that the contribution would have detrimental impact on the viability of development, particularly as it is being imposed at the time of large scale rezoning and land use uplift. By including it in planning controls now, future land owners and prospective purchasers will be forewarned of the expected contribution and it will be factored into the land value accordingly.</p> <p>4. The City agrees that infrastructure planning should always form part of the strategic planning process and to inform the preparation of the proposed controls commissioned or prepared 'in-house' technical studies to ensure adequate infrastructure is identified and factored into future planning. These include, but are not limited to:</p> <ul style="list-style-type: none"> • Economic Study; • Transport Study; • Affordable housing analysis; • Urban Design Study; and • review of social infrastructure and open space requirements. <p>The Planning Proposal includes FSR or height incentives to facilitate infrastructure provision.</p> <p>The Infrastructure Plan prepared by the City compiles in a single document the range of infrastructure that may be required in the area over the next 20 years. Its purpose is to be reviewed and updated with stakeholders to also include indicative costing and timing and funding mechanisms. The provision of some of this infrastructure is the responsibility of the NSW Government.</p> <p>The Planning Plan does not place unreasonable burden on development to fund infrastructure.</p> <p>5. Given the importance of the <i>Plan for Growing Sydney</i> (Plan), the City reviewed its key directions for any potential impact it may have on the proposed planning controls. The review, now included as part of the planning proposal, concludes there is no apparent conflict between</p>
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6. The proposed zoning changes do not consider the direct or indirect impact of major infrastructure projects such as WestConnex and the Second Sydney Airport on the employment lands. These projects both respond to and will drive further structural change in the economy which will see a major shift of freight and logistics activities to Western Sydney with consequences for demand and distribution of industrial land in Sydney. Council should revisit its studies and proposal in light of these significant planning and infrastructure projects

the draft controls and the Plan and that the draft controls will actively contribute to the achievement of its overarching goals and directions.

6. There has long been land reserved in the Sydney LEP for the purpose of an arterial road. While there were uncertainties about where the interchange might be identified exactly as the Planning Proposal was being prepared, it was a known possibility that it would locate within the proposed IN1 zone.

The potential for industrial activity to re-locate to the western suburbs of Sydney more quickly than otherwise expected should WestConnex progress was also understood, and provided additional weight to the argument for the proposed reduction in the amount of land currently zoned IN1.

While the extent of the impact that WestConnex may have on the employment lands cannot be fully understood ahead of detailed traffic modelling and a better understanding of the associated road upgrades, it is unlikely that it would result in the need for significant review of the proposed land use and planning controls.

The City is continuing its work with RMS and TfNSW to ensure that planning controls in the southern employment lands remain responsive to changing transport and traffic drivers as they emerge in the area.

Sydney's second airport at Badgerys Creek was announced in April 2014. While there is little confirmed information publicly available on its planning and timing, the Australian Government suggested in its announcement that construction is expected to begin in 2016 and will be completed by mid-2020s.

The airport at Badgerys Creek is proposed to start out as a smaller sized airport with a single runway which will serve the expected moderate demand in the short term, but eventually will develop into a full scale airport with parallel runways as demand increases. It is anticipated that while some industrial operations and services that support Kingsford Smith Airport may move from the inner-city to western Sydney in future, Kingsford Smith is still to remain Sydney's primary passenger and airfreight gateway and will require land to locate associated services.

	<p>7. Key issues and trends in the employment lands market across the Sydney Region have significant implications for the future of these land and have not been taken into account under the draft Planning Proposal and LEP/DCP amendments. Council should revisit its proposal in light of State and regional considerations in order to ensure that outcomes for both the employment lands and the broader Sydney Region are aligned with the public interest.</p> <p>8. Council should consider a bolder vision for the employment lands which includes alternative futures for the area which maximise employment yields as well as providing for mixed-uses.</p> <p>9. Council should reconsider the findings of specialist studies commissioned to inform the draft Planning Proposal and amend the proposal accordingly to ensure that established objectives for the future of these lands can be delivered.</p>	<p>The proposed controls acknowledge the likely reduction of demand for industrial activity over time by proposing a reduced IN1 zone. However, given the growth projections in the Airport Masterplan (Kingsford Smith Airport), it also recognises other uses associated with the airport that may be less industrial in nature will continue to locate in the area in the long term. This is supported by the submission received from Sydney Airport Corporation which notes the importance of the Sydney Airport in the national economy and the need to accommodate airport related uses in the long term.</p> <p>7. The Study provides a comprehensive analysis of the regional employment lands market and the market drivers that will affect change to the southern employment lands over the next 20 years.</p> <p>The draft controls are in the public interest. They provide a balance of appropriately zoned land to facilitate projected demand, and also ensure ongoing opportunities for new business and jobs growth.</p> <p>8. As discussed above, the proposed controls respond to a number of studies, submissions and consultations. There is no notable demand for widespread intensification of densities and heights in the B6 zone and IN1 zones.</p> <p>While some forms of development may require larger envelopes, they are the exception and, if deemed appropriate, may be facilitated by a planning proposal or Sydney LEP Clause 4.6 variation where considered appropriate. A blanket increase in heights and densities ahead of any apparent demand is likely to result in inflated land values which do not reflect the commercial realities of the area. In the 'investigation areas' in the B7 zone, any changes to zoning, heights and FSRs will be considered in the context of site specific planning proposals.</p> <p>9. The objectives for the southern employment lands are clearly established in the Planning Proposal as being to:</p> <ul style="list-style-type: none"> • encourage the timely delivery of infrastructure to support growth in the employment lands; • implement socially, environmentally and economically feasible land use and planning
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	<p>10. The Program and provisions should be removed from the planning framework and Council should consult with industry in the design of any affordable housing scheme for the area to ensure that it can be delivered without significant impacts upon development feasibility. Any program for the southern employment lands must be aligned with a provision for market residential which allows a mix of market and affordable housing within the B6 zone.</p>	<p>controls to support the primary role of the employment lands, being to facilitate employment generating uses;</p> <ul style="list-style-type: none"> • retain sufficient industrial zoned land to service the growing population and support infrastructure of state significance; • facilitate more flexible employment zones to accommodate the changing demands of business and industry; • contribute to the NSW Government’s employment targets by enabling a wider variety of land uses and greater employment density in appropriate locations; • facilitate the provision of affordable rental housing in and around the employment lands to enable essential workers to live close to where they work; • maximise the use of public transport, walking and cycling by locating more intense development activity close to well serviced transport routes and local services and limiting on-site parking; • encourage a public domain that is safe, accessible and attractive. <p>The objectives do not conflict with any of the findings of the technical studies and amendment is considered unnecessary.</p> <p>10. The demand for affordable housing resulting from the proposed planning controls is detailed in the AH Analysis.</p> <p>The Strategy and the resulting proposed controls facilitate three mechanisms to ensure the provision of affordable rental housing in the southern employment lands to house a growing workforce, including:</p> <ul style="list-style-type: none"> • a contribution requirement in the LEP; • permitting affordable rental housing in the LEP where it does no undermine the objectives of the employment lands; and • site specific planning proposals requests that incorporate affordable rental housing as part of a mixed use/market housing development. <p>The latter approach is specifically intended to align with projects for market housing. While the City recognises this mechanism as the greatest opportunity to facilitate affordable rental housing, the contribution requirement will also result in an important addition to affordable housing stock.</p>
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48	<p>25 Mandible Street, Alexandria</p> <p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<p>1. Businesses such as Concrete, which provide concrete to the inner city, are vital to Sydney's economic growth and cannot be relocated. In this regard, the relocation of the plant is not financially or strategically feasible. The draft Planning Proposal has failed to adequately demonstrate that the strategic functions of existing necessary "urban services" currently located within the IN1 would not be significantly compromised by the proposed zoning change and the introduction of sensitive land uses within its immediate proximity. Clause 7.25, as drafted, is weak and does not provide sufficient protection to existing industrial activities operating within the southern employment lands precinct from encroaching residential uses. The quasi-B4 zoning will result in inevitable pressure on existing industrial operations from incompatible sensitive land uses.</p>	<p>1. It is agreed that there is a strong demand and purpose for industrial land uses in the City. Notwithstanding this, the Study provides strong evidence for the reduction of the amount of land zoned for industrial purposes and a commensurate increase in the amount of land zoned for flexible employment uses, including some areas where some residential development may be suitable.</p> <p>The subject site is within the GSURA, located within 400 metres of the Green Square train station and within easy walking distance to the amenities to be provided at the Town Centre. Both of the proposed B7 areas have smaller subdivision patterns, which as a whole are not optimal for industrial uses. Moreover, they already have a strong presence of higher value employment uses and the progression of this trend is unlikely to falter, as is evidenced by the Economic Study.</p>

	<p>2. The draft Planning Proposal does not sufficiently justify the need for the proposed zoning amendments as they relate to land accommodating currently viable industrial uses. On the evidence provided by SGS Economics, there would appear to be no immediate need to rezone utilised and strategic industrial land for the purposes of commercial enterprise.</p> <p>3. The proposal will not only reduce the quantum of land on which traditional industrial uses can be carried out within the southern employment lands but will also increase the land costs due to “upward pressure” due to scarcity of inner city industrial land resources. Thereby displacing heavy industry and further undermining the viability.</p>	<p>For these reasons the B7 zones have been identified as the most appropriate places for higher value employment uses and in some cases residential development.</p> <p>While there is no requirement by the City that existing industrial uses move out of the areas, it is recognised that the sensitive land uses have the potential to impact on the long term viability of existing industrial activities.</p> <p>Where the draft controls permit affordable housing in the B7 zone, the provision includes consideration of surrounding uses. The provision will allow the City to ensure adequate mitigation measure can be taken in any sensitive use. Likewise with any future spot rezoning, the impact on existing employment uses will be considered.</p> <p>2. The Study provides strong evidence the reduction in the quantum of industrial land in the LGA and a commensurate increase in more flexible employment zoning to facilitate a wider range of non-residential activities. It also recognises the long term potential of most of the proposed B7 zone to accommodate some form of housing where it is part of a genuine mixed use zone.</p> <p>3. The increase in land value where land is proposed for rezoning for higher order uses is understood. However, as mentioned above the Study provided evidence of less demand in the future for relatively expensive inner-City industrial land. The rationale of the draft controls is to retain a core industrial zone to accommodate heavier industrial uses and to insulate it from more sensitive uses with the B6 zone. As above, the study recommends that the long term vision for the proposed B7 zone is a genuine mixed use precinct that allows a measure of residential alongside higher value employment uses.</p> <p>While it is noted that some heavier industrial uses, such as the concrete batching plant on the subject site, are scattered through the southern employment lands, the most suitable area for the proposed identified quantum of industrial land is at the southwest of the southern employment lands where the bulk of these uses already exist, it provides good accessibility to airport and road networks, including the proposed WestConnex interchange, and where there is less potential for land use conflict from</p>
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49	<p>Various</p> <p>The submission relates to the proposed affordable housing mechanisms within the employment lands.</p>	<p>1. Generally supportive of this initiative by the City to promote the provision of affordable housing in its LGA, particularly in an area where this was previously not available.</p> <p>2. Concerned that the ground floor of all developments for affordable housing in B7 Business Park zone will be required to be commercial/retail floor space.</p> <p>3. The 'investigative areas' in B7 zone allow for potential spot rezoning to allow for market housing, increase in FSR, heights etc. This may potentially reduce any competitive advantage for CHPs and open the area to private residential developers, against whom the CHPs will find it difficult to compete.</p> <p>4. The current proposal stipulates that affordable</p>	<p>1. Noted.</p> <p>2. The proposed clause is to be amended to allow for affordable housing to be provided at the ground floor where non-residential uses are retained facing an existing or planned street.</p> <p>3. The City recognises that in 'identifying investigation' areas this will impact on land values and may potentially reduce competitive advantage for CHPs. Notwithstanding, there will be other opportunities for CHPs that may arise from the site specific planning proposal process.</p> <p>4. While the City agrees that affordable housing is</p>

		<p>housing or “another public benefit” should be provided as part of any mixed development in the investigation areas. It is recommended that “another public benefit” should be removed from this reference and it should focus solely on affordable housing.</p> <p>5. Concerned that the area to the north of the employment lands overlaps with the GSURA and therefore funds, provision and management for affordable housing in this area will be restricted to one provider in line with Council’s existing arrangements made through the Green Square Affordable Housing Scheme. This exclusion of the GSURA from the employment lands perpetuates the historical discriminatory inequality generated by an outdated DCP and gives the one nominated CHP from this DCP a competitive advantage from the proposed changes in almost all the proposed rezoned non-investigative B7 zone.</p>	<p>of high importance in the area, it must also provide other infrastructure that is required to support growth in the southern employment lands, for example roads and open space.</p> <p>5. The <i>Green Square Affordable Housing Program</i> applies to land in the southern employment lands that is also located in the GSURA. Review of the Green Square Program is outside the scope of the review of the City’s employment lands. To avoid duplication, the Program will not apply to land that is already subject to the Green Square Program.</p> <p>While the existing Program is being retained in a relatively small portion of the area of the southern employment lands that overlaps with GSURA, a range of mechanisms are being introduced to encourage the provision of affordable housing. Together they will create new opportunities for a number of CHPs who seek to provide affordable housing within the LGA. There is no significant advantage for a particular CHP in the proposed controls.</p>
50	<p>City interface with Marrickville, Alexandria and St Peters</p> <p>The submission relates to the interface between Sydney LGA and Marrickville LGA.</p>	<p>Marrickville Council supports the principles of the City’s proposed changes. Council particularly supports the proposals to promote affordable housing and sustainable transport, and to allow for intensification and diversification of employment uses whilst retaining some land for more traditional industries. Council has not identified any conflicts in these principles with the guiding principles of Council’s current planning controls or with the recommendations of the recent review of the Marrickville Employment Lands Study. Nor has Council identified any potential cross-border zoning conflicts.</p>	<p>Noted.</p>
51	<p>Various (RMS)</p> <p>The submission related to the southern employment lands in general.</p>	<ol style="list-style-type: none"> 1. RMS supports the City’s strategy to target this area for employment and residential growth. 2. It is considered a sustainable growth target should be established by testing various growth scenarios using the latest traffic and transport targets available. RMS is willing to assist the City by making available forecast data for the precinct to 2036. 	<ol style="list-style-type: none"> 1. Noted. 2. The City will continue to work with RMS to establish appropriate targets for mode shift. The Planning Proposal and the DCP amendment include provisions to encourage mode shift towards more sustainable forms of transport. As more information becomes available, later amendments may follow.
52	<p>154 Euston Road, Alexandria</p>	<ol style="list-style-type: none"> 1. Objects to the new street in the Sydney DCP which runs through the subject site. As a consequence of the proposed street it is likely to 	<ol style="list-style-type: none"> 1. While the predominantly industrial nature of the area is recognised, this does not negate the need to introduce measures to improve

	<p>The subject site is located in the IN1 zone in the south-west of the southern employment lands. Rezoning of the site is not proposed.</p>	<p>require the removal of part of a building that is intended to be adapted and retained, and would seriously undermine any future development potential of the site.</p> <p>2. There are concerns relating to the increase in traffic from the proposed WestConnex motorway project/ St Peters Interchange, including a gridlock on Campbell Street/Campbell Road, the Princess Highway and Euston Road, and the creation of a new “rat-run” further north over the Alexander Canal and Bourke Road.</p> <p>3. Suggests the City consider deferring the draft Sydney DCP until such time as the detailed design of the WestConnex/St Peters Interchange is released and the projected traffic volumes are known.</p>	<p>permeability and access through a highly constrained area. In the case of the proposed road affecting the subject site it is the most desirable location because of its proximity to proposed road across the canal and it will facilitate exit from the linear strip of open space and cycle path along the western edge of the canal to the site on the western wedge of Euston Road and to Sydney Park.</p> <p>Identification of the road does not require immediate dedication of land to Council nor does it force the removal of any existing building. The reasonableness of a land dedication requirement is considered in the context of a development application. If the application is to adaptively reuse an existing building in the path of the road then dedication may not be required.</p> <p>No area stays the same over time. Sites can be bought and sold and redeveloped for a range of different purposes multiple times over a long period of time. The purpose of the DCP is to articulate the future vision for public domain and roads. This allows the City to incrementally secure the parcels of land that may be needed in the longer term.</p> <p>This approach has been taken in the GSURA where in the late 1990’s the planning controls identified a future road network when the area was rezoned from industrial to mixed uses. This approach has resulted in considerable improvement to a road network that needed to respond to a new predominant use.</p> <p>2. The City shares concern over the impacts of the WestConnex interchange on local road networks, however being a NSW Government project the City has little direct control over outcomes. Where there is opportunity, the City will work with WestConnex to minimise impacts of the interchange on local roads.</p> <p>3. The traffic volumes generated by WestConnex will not negate the need to provide a more permeable road network through the employment lands. If and when redevelopment of the subject site occurs that would result in the dedication of a road, the need for and suitability of the road will be considered in the context of any existing or proposed network.</p>
53	Various (TfNSW)	A submission from TfNSW noted concerns with the potential impact the Planning Proposal may have on	Following consideration of the submission from TfNSW, and additional meetings with RMS and

	<p>The submission related to the southern employment lands in general.</p>	<p>freight movements and requested an updated transport assessment be prepared by the City as the transport drivers in the area become more clear.</p>	<p>TfNSW, the report to Council and the CSPC recommend the City continue to work with RMS and TfNSW to develop the parameters of a future study to guide growth in the area.</p> <p>It is noted that those actions that will have the most potential to address the transport challenges in southern Sydney are the responsibility of the NSW Government, for example, the provision of sufficient public transport. The City also has an important role in encouraging mode shift and managing road travel demand, for example, by limiting parking. Therefore, any future study may also result in further amendments to the planning controls to implement its recommendations.</p>
54	<p>1-3 Mandible Street, Alexandria</p> <p>The subject site is located in the northern 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p> <p>It is noted the site has been recommended for heritage listing and is currently the subject of Planning Proposal: Sydney LEP 2012 Industrial and warehouse buildings heritage study</p>	<ol style="list-style-type: none"> 1. Council should amend Schedule 1 of the LEP to include a clause applying to the subject site to permit development for the purposes of shop top housing in the proposed B7 zone. Council should consider permitting at least 50% of the subject site to residential development, including affordable housing. 2. It is also requested Council consider an increase in FSR from 1:1 to 1.75:1 for the subject site. 	<ol style="list-style-type: none"> 1. It is proposed that residential uses generally not be permitted in the southern employment lands for a range of reasons. Residential uses are likely to be environmentally incompatible with the existing uses in the employment lands and result in land use conflicts and/or long term pressure on the operational viability of some uses that need to locate in the zone. <p>Residential uses are also economically incompatible with the long term vision for the employment lands. Markedly higher returns that developers receive from developing a residential product as opposed to a commercial product will displace employment generating uses over time and limit the potential for jobs growth.</p> <p>Notwithstanding this, the draft controls and the Strategy recognise some potential for residential in the area in the long term and provide an avenue for limited residential growth (both market and affordable rental) in 'investigation areas' where it would not unreasonably impact on the employment generating potential of the area and would contribute to the objectives of the employment lands.</p> <p>The subject site is located within an 'investigation area' and a rezoning to a B4 zone may be justified through a site specific planning proposal process. The Guideline provides a framework for the consideration of site specific planning proposals.</p> <ol style="list-style-type: none"> 2. Additional FSR is not supported at this time, though may be considered in the context of a future site specific planning proposal where there is adequate justification for increase.

55	<p>25 Mandible Street, Alexandria</p> <p>The subject site is located in the north 'investigation area' which is generally bound by McEvoy Street, Wyndam Street, Mandible Street and Bowden Street. It is currently zoned IN1 and is proposed to be zoned B7.</p>	<p>Concerned about the potential residential development that may locate in the area, given the impact it would have on the operations of the concrete batching plant on the subject site.</p> <p>Concrete is an essential urban service that needs to locate close to the large building and construction projects happening in the inner-city.</p>	<p>This is a form submission on behalf of Concrete.</p> <p>The Study provides strong evidence for the reduction of the amount of land zoned for industrial purposes and a commensurate increase in the amount of land zoned for flexible employment uses, including some areas where some residential development may be suitable.</p> <p>The subject site is within the GSURA, located within 400 metres of the Green Square train station and within easy walking distance to the amenities to be provided at the Town Centre. Both of the proposed B7 areas have smaller subdivision patterns, which as a whole are not optimal for industrial uses. Moreover, they already have a strong presence of higher value employment uses and the progression of this trend is unlikely to falter, as is evidenced by the Economic Study.</p> <p>For these reasons the B7 zones have been identified as the most appropriate places for higher value employment uses and in some cases residential development.</p> <p>While there is no requirement by the City that existing industrial uses move out of the areas, it is recognised that the sensitive land uses have the potential to impact on the long term viability of existing industrial activities.</p> <p>Where the draft controls permit affordable housing in the B7 zone, the provision includes consideration of surrounding uses. The provision will allow the City to ensure adequate mitigation measure can be taken in any sensitive use. Likewise with any future spot rezoning, the impact on existing employment uses will be considered.</p>
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