

# Planning Proposal Manchester Road, Auburn



Amendment to *Auburn Local Environmental Plan 2010*  
Submitted to Cumberland Council  
On behalf of PAYCE Consolidated

**18 December 2017 (*Amended 30 August 2018*)**

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## Attachments

<b>Attachment 1</b>	Revised Urban Design Report, Landscape Strategy and Masterplan prepared by PTW/Context
<b>Attachment 2</b>	Revised Transport and Traffic Impact Assessment prepared by Jacobs
<b>Attachment 3</b>	Manchester Road Strategic Justification by SGS Economics
<b>Attachment 4</b>	Revised Noise Impact Assessment prepared by Acoustic Logic
<b>Attachment 5</b>	Revised Sustainability Report prepared by Northrop
<b>Attachment 6</b>	Heritage Impact Statement prepared by Casey Lowe
<b>Attachment 7</b>	Landuse Suitability Reports (Remediation Action Plan, Site Investigation, Landuse Suitability) coordinated by Trace Environmental
<b>Attachment 8</b>	Preliminary Flood and Site Servicing Report prepared by Northrop
<b>Attachment 9</b>	Ecological Impact Assessment prepared by Cumberland Ecology
<b>Attachment 10</b>	Land Survey prepared by LTS Lockley
<b>Attachment 11</b>	Odour Impact Assessment prepared by Pacific Environment
<b>Attachment 12</b>	Clyde Intermodal Terminal Assessment prepared by Arcadis/Neil Matthews Consulting
<b>Attachment 13</b>	1 <sup>st</sup> Submission to Cumberland Draft EILS dated 3 November 2017 prepared by Keylan Consulting and SGS Economics
<b>Attachment 14</b>	2nd Submission to Cumberland Draft EILS dated 20 April 2018 prepared by Keylan Consulting and SGS Economics
<b>Attachment 15</b>	Revised Retail Impact Assessment prepared by Leyshon

# 1 Executive Summary

This report has been prepared by *KEYLAN Consulting Pty Ltd* on behalf of PAYCE Pty Ltd (PAYCE) in support of an Amended Planning Proposal to Cumberland Council (Council) to amend the planning controls relating to a 14.1ha Site in Manchester Road, Auburn to facilitate its urban renewal and future mixed use development.

On 18 December 2017, a Planning Proposal (the 2017 Proposal) was lodged with Cumberland Council seeking to rezone the Site for a mixed use development. The application was placed on preliminary public exhibition from 24 January 2018 to 26 February 2018. This proposal remains undetermined.

Following the lodgement of the 2017 Proposal, PAYCE consulted with senior Council staff and briefed the elected Council on the proposal. In response to constructive feedback received from Council, public submissions and further technical input from traffic, acoustic and economic experts, the original proposal has been amended (the Amended Proposal).

***In particular, issues raised by Sydney Trains have been addressed to ensure the existing and future operational needs of this important State Government rail asset are not compromised and can co-exist with the Amended Proposal.***

A previous Planning Proposal, lodged with Council in 2015 (the 2015 Proposal) was subsequently withdrawn on 14 December 2016. The 2015 Proposal sought to accommodate approximately 2,900 dwellings, a neighbourhood retail centre, community facilities, public streets and public open space.

The Amended Proposal contemplates significant changes to the 2017 Proposal and even further changes from the 2015 Proposal, namely a large reduction in the residential dwelling yield and density with a significant increase in the employment land component.

***The Amended Proposal will deliver a total of 2,612 operational jobs and 3,312 construction jobs (direct and indirect) on Site. This represents 1,338 operational jobs on Site which results in a net increase of between 977 and 1,122 jobs (or between 1,955% and 2,224%) and an additional 300 commercial jobs .***

The proposal is a significant increase (167%) in industrial floorspace on site as well as accommodating approximately 25% and 75% of Cumberland's future growth of industrial and urban services jobs respectively, providing new and flexible building stock to support emerging industries such as advanced manufacturing, local business growth and urban services that support the LGA's growing population.

***The Masterplan is also expected to deliver 1,150 new dwellings, a significant portion of the 9,350 dwellings target under the Government's Central City District Plan.*** The Amended Proposal also includes affordable housing to assist in reducing pressure on social housing and households experiencing housing stress in the Auburn area.

The development has the potential to deliver benefits and opportunities for both residents and those currently living in the Auburn area. This may include new employment opportunities within 30 minutes of where people live, access to new facilities, and opportunities for recreation and social engagement through well planned areas of open space and community facilities.

A comparison of the key metrics of the 2017 Proposal and the Amended Proposal is outlined below:

Key Component	2017 Planning Proposal	2018 Amended Planning Proposal	Difference
Dwellings	approx 1,800 dwellings	approx 1,150 dwellings	- 650 less dwellings
Affordable rental housing	5% 90 dwellings	5% 58 dwellings	5% maintained
Total Gross Floor Area (GFA)	199,541m <sup>2</sup>	180,000m <sup>2</sup>	-19,541m <sup>2</sup>
Total Residential GFA	164,307m <sup>2</sup>	103,000m <sup>2</sup>	-61,307m <sup>2</sup>
Total Non-residential GFA	Employment uses 30,000 - 40,000m <sup>2</sup> Retail 6,000m <sup>2</sup> Community 2,000m <sup>2</sup> Child care centre 1,000m <sup>2</sup>	Employment uses 75,000m <sup>2</sup> Retail 1,000m <sup>2</sup> Community/Child care 1,000m <sup>2</sup>	Employment uses +45,000m <sup>2</sup> Retail -5000m <sup>2</sup> Community/child care -2,000m <sup>2</sup>
FSR	1:1 (northern area)  1.7:1 (southern area)	1:1 (northern employment areas) 1.5:1 (remaining areas)	Employment FSR No change Residential FSR - 0.2:1
Building Height	2 to 12 storeys	2 to 12 storeys	No change

Table1: Comparison between the 2017 Proposal and the 2018 Amended Proposal for the Site

### ***The Amended Planning Proposal***

The Amended Proposal seeks to amend the *Auburn Local Environmental Plan 2010* (Auburn LEP 2010) for land known as 300 Manchester Road, Auburn (the Site). The primary purpose of the Amended Proposal is to:

- maintain the existing industrial zone on the northern 6ha of the Site with amendments to allow additional permitted uses:
  - *Office premises (limited to a maximum of 10% of GFA)*
  - *Car park*
  - *Health service facility*
  - *Respite day care*
  - *Centre-based childcare facility*
- rezone the remaining 8.1ha of the Site from the IN1 General Industrial zone to following:
  - B7 Business Park zone (1ha)
  - RE1 Open Space (2.1ha)
  - R4 Residential (5ha)

The Amended Proposal seeks a significant increase in employment opportunities on the Site and a substantial reduction in the number of residential dwellings. A variety of building heights are proposed to a maximum of 42 metres (equivalent to 12 storeys), with a floorspace ratio (FSR) of 1:1 for the northern employment area and 1.5:1 for the remainder of the Site.

A Voluntary Planning Agreement (VPA) offer is also intended to be included, to deliver many public benefits in addition to s94A contributions towards local services, consistent with the public benefits outlined in this report and subject to negotiation with Council.

### **Public Benefits**

The urban renewal of the Site will result in significant public benefit for new communities within the Site, existing communities and surrounding neighbourhood.

The Amended Proposal will provide for;

- A total of approximately 1,150 dwellings
- 5% of total dwelling yield as affordable rental dwellings
- A 6ha of industrial zoned land providing 60,000m<sup>2</sup> of gross floor area for employment uses (industrial)
- A 1ha of business zoned land providing 15,000m<sup>2</sup> of gross floor area for employment uses (urban services)
- 1,000m<sup>2</sup> of gross floor area for retail uses (neighbourhood shops and a potential childcare centre)
- 1,000m<sup>2</sup> community facility
- 2.2ha of public open space, comprising of:
  - a large park
  - a series of pocket parks
- Tree lined streets and landscaping throughout the whole precinct

The development will provide up to 3,312 construction jobs (direct and indirect) and 2,612 operational jobs (direct and indirect) representing a strong contribution to the broader economy.

PAYCE will deliver essential infrastructure required to service the Site, including the construction and dedication of internal roads in close consultation with Council.

The public benefits and Section 94 contributions associated with the proposed urban renewal of PAYCE's land at Auburn amount to a contribution of up to **\$51 million**<sup>1</sup> for the locality as follows:

- 1% levy for Section 94 Contributions valued at **\$9 million**.
- A large public park
- A networks of pocket parks and connected by landscaped road reserves
- Community Centre
- Infrastructure upgrades – including intersection upgrades, services and road and intersection upgrades
- Duck River regeneration including scope of works and costs
- shuttle bus connecting the Site to Auburn train station

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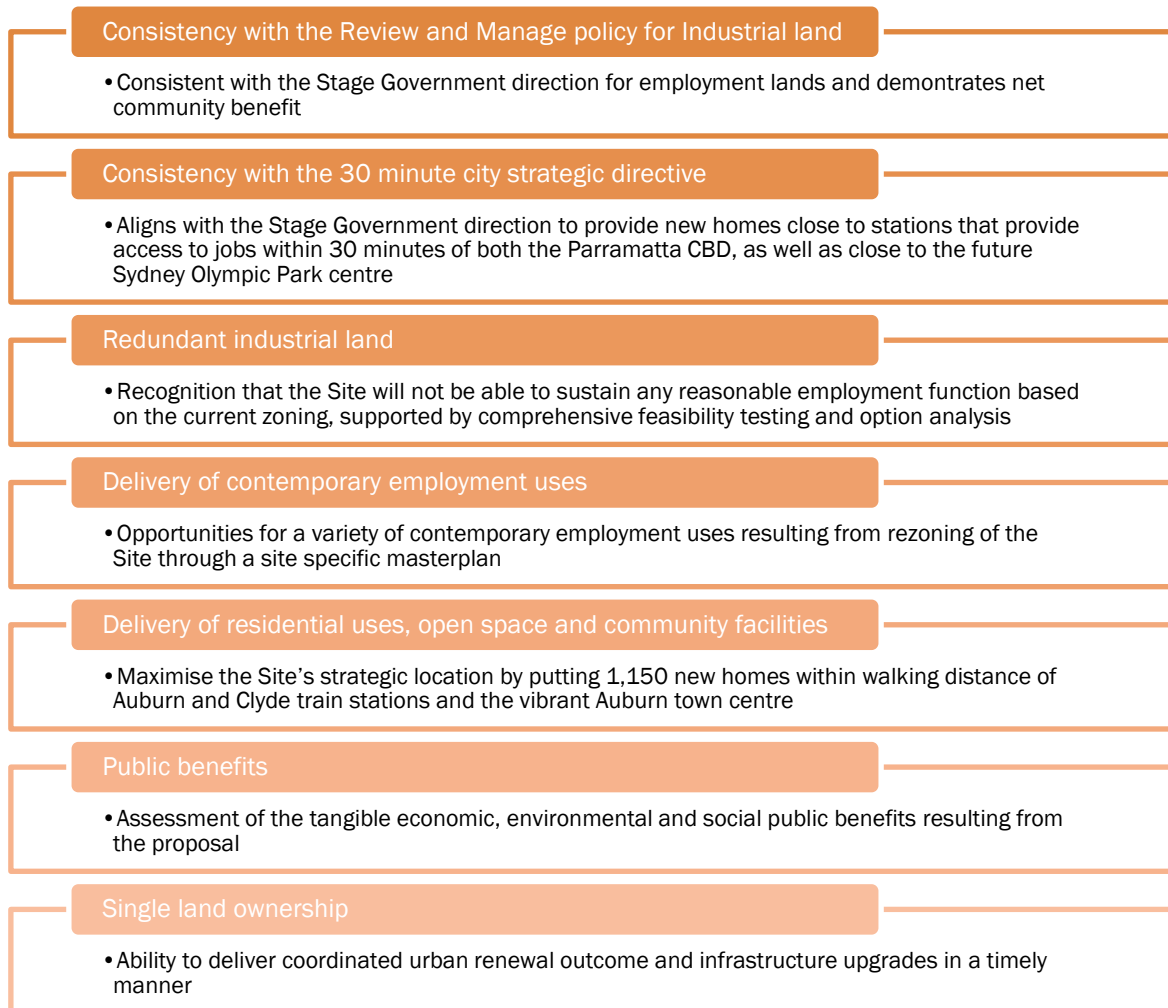
<sup>1</sup> All figures are approximate for the purposes of the Planning Proposal report. An independent and comprehensive cost evaluation will be undertaken for any formal VPA offer if accepted by Cumberland Council in accordance with the relevant legislation and guidelines.



PAYCE propose to ensure the delivery of these benefits through a formal offer to enter into a VPA with Cumberland Council subject to the provisions of the *Environmental Planning and Assessment Act 1979*.

### ***The Case for Change***

The strategic justification for the Amended Proposal is summarised as follows:



### ***Net Community Benefit Test and Strategic Planning Multi-Criteria Analysis***

SGS undertook further analysis to strengthen the strategic planning justification of the case for change to support the Amended Proposal. This work consisted of a *net community benefit test* and *multi-criteria analysis* of the Greater Sydney Region Plan.

This work assessed the Amended Proposal against a full industrial option for the site and concludes:

**Net Community Benefit test**

*The NCB suggests that the Project case is likely to deliver an increase in wider benefits compared to the base case and a wider variety of benefits than the full industrial case. This includes in terms of providing more accessible homes and employment, infrastructure cost savings (compared to greenfield development), increased open space values, more efficient provision of urban services, and a higher value mixed use urban environment.*

**Strategic Planning MCA**

*The Project case meets more of the GSC's Directions and Objectives compared to the Industrial build out scenario. SGS' review of the scenarios against the Greater Sydney Region Plan's 10 Directions and 38 Objectives identified that the Project case was more aligned with these principles than the Industrial build out scenario, including when the scores were normalised.*

**Amended Masterplan**

The *Manchester Road Amended Masterplan* outlines the proposed internal street layout, open space, community uses, public domain, building platforms, heights and future landuses. The Masterplan is accompanied by an Urban Design Report and Landscape Concept Plan. The Masterplan comprises of the following components:

- a 6ha employment area to the north (zoned industrial)
- a 1ha employment area to the east (zoned business)
- a large public Park
- a series of neighbourhood parks
- a 5ha residential area

The Masterplan provides certainty for future landuses and built form (augmented by proposed Auburn LEP 2010 amendments) and is proposed to form the basis of a site-specific Development Control Plan (DCP) for the Site in collaboration with Council following the Gateway process.

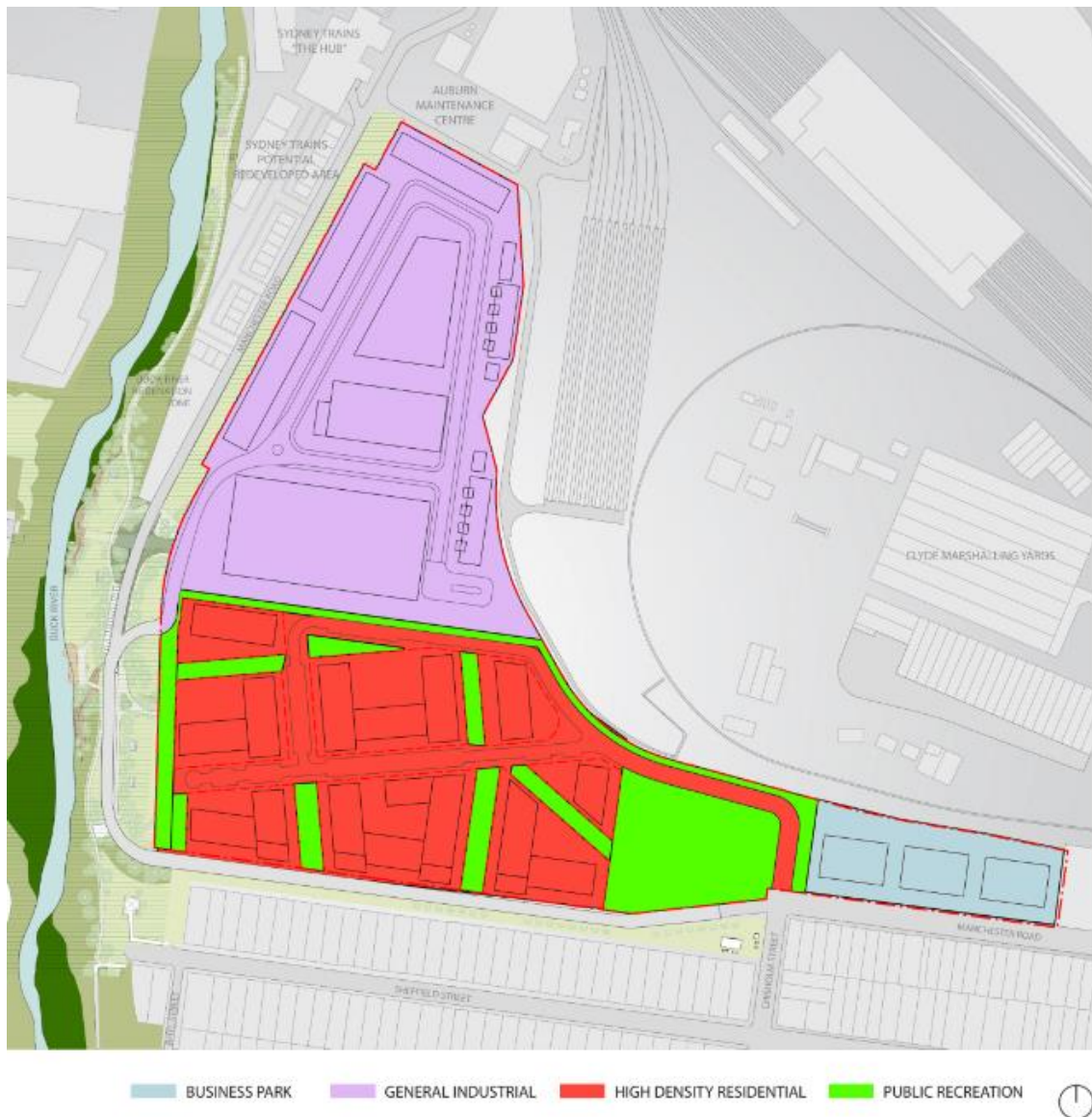


Figure 1. Manchester Road Masterplan (Source: PTW 2017)

### Strategic Planning Context

The Amended Proposal is generally consistent with the relevant Strategic Plans, including:

- A Metropolis of Three Cities (Greater Sydney Region Plan)
- Central City District Plan
- Cumberland Community Strategic Plan
- Auburn Employment Lands Strategy
- Draft Employment and Innovation Lands Strategy and Land Use Planning Framework

The strategic planning context will be assessed in detail in this Report.

### ***Employment and Economic***

The Amended Proposal is supported by a comprehensive report prepared by SGS which addresses: strategic context, LGA profiling, site feasibility, economic impacts, social impacts and a strategic assessment (including a net community benefit test and strategic planning multi-criteria analysis).

This report investigates the potential for viable employment uses for the site and the associated economic impacts and concludes that the Amended Proposal will provide significant economic and employment benefits for the site and broader community.

### ***Traffic, Transport and Connectivity***

The Amended Proposal is consistent with the objective for the 30-minute city as outlined in the plan for Greater Sydney. The site is within a walkable distance to the Clyde and Auburn train stations and the propose shuttle bus will improve accessibility to rail services. In addition, there are several bus stops located within 200m walking distance. Bus routes could also be easily adapted to service the Amended Proposal.

The industrial component of the site will continue to be served by the private road while the business component would have direct access from Manchester Road. Access to the residential component of the site is via a new access road that aligns with Chisolm Road. The intersection of Chisolm Road and Manchester Road is proposed to be converted to a roundabout to facilitate traffic movements as part of the access arrangements.

The Amended Proposal includes active transport connections to the shared paths along Duck River. The existing off-road path to Clyde station provides good access for pedestrians and cyclists.

The existing road network is constrained by the operation of intersections at Mona Street / Clyde Street and South Parade /Rawson Street. Consequently, intersection upgrades are included in the Amended Proposal. These will have a wider benefit for the general community by providing more road capacity at existing intersections than the current situation.

### ***Affordable Rental Housing***

The Amended Proposal includes the provision of 58 affordable dwellings for key workers which meets the 5% target contained in the *Cumberland Planning Agreements Policy* and the 5-10% target in the *Central City District Plan*. These will be managed by a registered Community Housing Provider and would provide important housing for key workers and those on lower incomes, which is important in making new communities and centres functional and socially responsible.

PAYCE is also committed to exploring other options regarding initiatives for first home-buyers, innovative housing products, possible equity-sharing and other models to encourage housing affordability, in collaboration with the Local and State Government, provided appropriate models and incentives are available.

## **Heritage**

A detailed Heritage Impact Assessment (HIA) has been undertaken for the site by Casey and Lowe and was submitted with the 2017 Proposal. The HIA concludes that the site retains no elements relevant to its original heritage listing as the Clyde Marshalling Yards. As the site contains no heritage elements and is physically separated from the remaining marshalling area, the proposal will not lead to any heritage impacts.

## **Sustainability**

Environmental Sustainability is a guiding principle in the development of the amended Masterplan and amended Landscape Masterplan. This report outlines numerous sustainability objectives, measures and initiatives to be further developed during the development of the Site. The key sustainability initiatives relate to energy efficiency, indoor environment quality, water management, sustainable transport, waste minimisation, materials selection, land use and ecology and community and liveability.

These sustainability initiatives have been incorporated in the Urban Design Report to inform the Masterplan and Landscape Strategy.

## **Community Facilities, Education and Social Impacts**

The *Social Impact Assessment* (SIA) prepared by SGS also includes a community and recreation facility assessment. The Report identifies the need for community facilities, including schools, childcare, community spaces and open space that can be accommodated either within the existing locality or on site.

The Report concludes that the social impacts and benefits of the Amended Proposal are as follows:

***The provision of new facilities as part of the development will deliver benefits for the existing community around the site. This will include access to services, employment opportunities, and improved public open space.***

***The Project case would provide a significant contribution to the Cumberland LGA's dwelling target under the Central City District Plan. The Project case is expected to deliver 1,150 new dwellings, a significant portion of the 9,350 dwellings target under the Plan. This will also include affordable housing, and helping to alleviate pressures on social housing and households experiencing housing stress in the Auburn area. The development has the potential to deliver benefits and opportunities for both residents and those currently living in the Auburn area. This may include new employment opportunities within 30 minutes of where people live, access to new facilities, and opportunities for recreation and social engagement.***



### ***Proposed Planning Controls***

The Planning Proposal seeks amendments to the *Auburn Local Environmental Plan 2010* (Auburn LEP 2010) for land at Manchester Road, Auburn (the Site). The primary purpose of this Proposal is to:

1. Amend the Land Use Zoning Map to rezone 8.1ha of the Site from the *IN1 General Industrial* zone to facilitate the urban renewal of the Site as follows:
  - B7 Business Park (1ha)
  - R4 High Density Residential (5ha)
  - RE1 Public Recreation (2.1ha)
2. Retain the existing IN1 General Industrial zoning on the northern 6ha of the Site with the following additional uses as an amendment to *Schedule 1 - Additional permitted uses*:
  - Office premises (limited to max 10% of total GFA)
  - Car park
  - Health service facility
  - Respite day care
  - Centre-based childcare facilities
3. Amend the Height of Buildings Map to allow a maximum height limit of up to 42 metres on the residential zoned land.
4. Amend the Floor Space Ratio Map to allow a maximum FSR of 1.5:1 on the rezoned land
5. Amend the Lot Size Map to have no minimum lot size on the site.

PAYCE proposes to work closely with Council staff on appropriate controls to be part of any formal public exhibition package following Gateway determination.

### ***Next Steps***

The following next steps are proposed in the consideration of the Amended Proposal:

- consideration by Council and submission to DP&E (subject to in principle Council support)
- Council to formally consider the amended Planning Proposal and supporting reports
- Council to amend the 2017 Draft Employment & Innovative Lands Strategy (EILS) to align with the Amended Planning Proposal as it relates to the site
- Continue working with Council and State agencies on associated infrastructure
- work with Council on detailed DCP controls for the Site (including public domain)
- completion of any planning reports to address post Gateway requirements
- public exhibition of the Planning Proposal
- consideration of submissions by Council following public exhibition
- finalisation of the LEP amendment

## 1. Public Benefits

The urban renewal and transformation of PAYCE'S land at Manchester Road will result in significant public benefits for new communities within the Site, existing residents and the surrounding neighbourhood.

### *On-Site public benefits include:*

- approximately 1,150 dwellings comprising of a mix of apartment sizes
- 5% of total dwelling yield as affordable rental dwellings (equating to 58 dwellings)
- 7ha providing for 75,000m<sup>2</sup> of gross floor area for employment uses
- 1,000m<sup>2</sup> community facility
- 1,000m<sup>2</sup> for neighbourhood shops (including potential child care centre)
- 2.2ha of public open space, comprising of;
  - a large park
  - a series of pocket parks
- landscaping throughout the whole precinct
- separate access for residential and employment uses

### *The off-Site public benefits include:*

- Duck River regeneration
- Affordable Housing –5% of the unit yield as affordable rental housing to be held by PAYCE for 12-15 year period
- Traffic upgrades to adjoining street network (intersection road upgrades)
- Other infrastructure upgrades
- Remediation costs

The total public benefits and Section 94 contributions associated with the proposed urban renewal of the Site amount to a contribution up to **\$51 million** for the locality.

These community benefits are indicative and will be subject to further consultation with Council during the Planning Proposal process and VPA.

These benefits include works in kind, land value and monetary contributions in addition to the required 1% levy for Section 94 Contributions in accordance with the *Auburn Council Development Contributions Plan* (under the proposed scheme valued at **\$9 million**).



Figure 2. New housing, jobs and public spaces (Source: PTW 2017)



Figure 3. Proposed Central Park (Source: PTW 2017)



## 1.1 Staging and Delivery

The staging and delivery of the redevelopment of PAYCE's Site at Auburn is a key element in the implementation of the Masterplan. The delivery of public open space, infrastructure and proposed transport initiatives need to be delivered early to create a sustainable community for people to live and work.

The attraction of new employers and workers is a primary objective of the Amended Proposal by creating a high amenity environment with higher employment densities.

It is estimated approximately 300 to 500 apartments can be delivered each year<sup>2</sup> with settlements commencing in year 3 of the development.

A high level Staging Plan, indicating early delivery of key public benefits to support future residential and employment areas will be prepared in consultation with Council as part of the Planning Proposal process and VPA.



Figure 4. Indicative Staging Plan (Source: PTW 2018)

<sup>2</sup> Apartment delivery is a guide only and is subject to changes in residential market conditions, authority approvals and delivery constraints.

## 2 The Case for Change – Strategic Planning Justification

The Site at Manchester Road provides a unique opportunity to capitalise on long standing redundant industrial land to create feasible and contemporary employment opportunities supported by a new mixed use development. The Amended Proposal follows detailed strategic analysis to justify the proposed rezoning of existing industrial land to a mixed use development.

The Amended Proposal will deliver a significant increase (167%) in industrial floorspace on site as well accommodating approximately 25% and 75% of Cumberland's future growth of industrial and urban services jobs respectively, providing new and flexible building stock to support emerging industries such as advanced manufacturing, local business growth and urban services that support the LGA's growing population.<sup>3</sup>

This analysis included feasibility testing of the proposal against a number of development scenarios, economic impact, social impact and consideration against key state and local strategic planning policies.

The case for change for the urban renewal of the site is categorised by the following key themes:

- **Consistency with the Review and Manage policy for Industrial land** - consistent with the Stage Government direction for employment lands and net community benefit
- **Consistency with the 30 minute city strategic directive** - aligns with the Stage Government direction to provide new homes close to stations that provide access to jobs within 30 minutes of both the Parramatta CBD, as well as close to the future Sydney Olympic Park centre
- **Redundant industrial land** - recognition that the site will not be able to sustain any reasonable employment function based on the current zoning, supported by comprehensive feasibility testing and option analysis
- **Delivery of contemporary employment uses** - opportunities for a variety of contemporary employment uses resulting from rezoning of the site through a site specific masterplan
- **Delivery of residential uses, open space and community facilities** - maximise the site's strategic location by putting 1,150 new homes within walking distance of Auburn train station and the vibrant Auburn town centre
- **Public benefits** - assessment of the tangible economic, environmental and social public benefits resulting from the proposal
- **Single land ownership** - ability to deliver coordinated urban renewal outcome and infrastructure upgrades in a timely manner

In addition, SGS undertook further analysis to strengthen the strategic planning justification of the case for change to support the Amended Proposal. This work consisted of a *net community benefit test* and *multi-criteria analysis* of the Greater Sydney Region Plan.

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<sup>3</sup> Manchester Road Strategic Justification August 2018, SGS – (Attachment 3)



This work assessed the Amended Proposal against a full industrial option for the site and concludes:

**Net Community Benefit test**

*The NCB suggests that the Project case is likely to deliver an increase in wider benefits compared to the base case and a wider variety of benefits than the full industrial case. This includes in terms of providing more accessible homes and employment, infrastructure cost savings (compared to greenfield development), increased open space values, more efficient provision of urban services, and a higher value mixed use urban environment.*

**Strategic Planning MCA**

*The Project case meets more of the GSC's Directions and Objectives compared to the Industrial build out scenario. SGS' review of the scenarios against the Greater Sydney Region Plan's 10 Directions and 38 Objectives identified that the Project case was more aligned with these principles than the Industrial build out scenario, including when the scores were normalised.*

Consideration of these key areas of strategic planning justification is outlined throughout this report and summarised below:

## 2.1 Consistency with the *Review and Manage* policy for Industrial land

The Amended Proposal is consistent with the latest strategic planning framework for Greater Sydney as outlined in *A Metropolis of Three Cities* (Greater Sydney Region Plan) and the *Central City District Plan* (the District Plan). In this regard, SGS have undertaken a multi-criteria analysis of the Region Plan, noting (**BOLD** our emphasis):

*...the site provides opportunities for new space for industries to move into an established area with strong accessibility to an available workforce. The site provides new floorspace that can meet the changing requirements for industrial floorspace, and is unique in that it offers a greenfield development opportunity, while most developments in the area currently are alterations and additions to existing sites...*

Importantly, the analysis concludes that an assessment against the Greater Sydney Region Plan's 10 Directions and 38 Objectives identified that the Amended Proposal was more aligned with these principles than the Industrial build out scenario.

The Amended Proposal also results in a **net community benefit** when assessed against the planning priorities and objectives of the District Plan.

We note that the District Plan contains 22 relevant planning Priorities. The revised planning proposal has a **strong** ability to deliver 11 priorities, a **moderate** ability to deliver 6 priorities and 5 priorities are not applicable.

An assessment of the revised planning proposal in the context of the District Plan has also been undertaken (Section 8). The analysis concludes that the revised planning proposal will also strongly contribute to the following planning priorities as summarised below:

Planning Priority	How the revised planning proposal delivers:
C1	<ul style="list-style-type: none"> <li>The provision of infrastructure (open space, roads and environmental upgrades)</li> </ul>
C3	<ul style="list-style-type: none"> <li>The provision of social infrastructure (social housing, child care centre and possible community facility)</li> </ul>

Planning Priority	How the revised planning proposal delivers:
C5	• well-located housing supply including affordable housing
C6	• a wholistic approach to the renewal of a strategically located site
C7	• Investment in business opportunities and job creation
C13	• The rejuvenation of the Duck River corridor
C16	• Additional tree planting to increase the urban tree canopy
C17	• New public open space areas
C19	• Incorporation of ESD objectives
C20	• Responsive to climate and change and natural hazards
C21	• Representative of a collaborative approach to planning

The Amended Proposal is *not inconsistent* with any of the planning priorities contained in the District Plan. Consequently, it contributes significantly the objectives of the District Plan and results in a ***net public benefit***.

## 2.2 Consistency with the 30-minute city Government policy

The Amended Proposal aligns with the Stage Government direction to provide new homes close to stations that provide access to jobs within 30 minutes of both the Parramatta CBD, as well as close to the future Sydney Olympic Park centre.

This is further considered in both the SGS and Jacobs analysis on the employment, workforce and education of employees and potential travel times to Greater Parramatta and Sydney Olympic Park. This can be seen in the following conclusions in the SGS analysis of the benefits of the related proposal:

- *Accommodate jobs and locations for local businesses that align with the workforce skills of the Cumberland LGA and within a 30 minute public transport catchment*
- *Aligns employment type with resident workforce skills and potential to support industry training for local population, particularly as 41% have no formal education beyond secondary school and many of which live within 30-minutes of the precinct.*
- *Provides opportunity to support maturation of the Parramatta CBD by providing new employment floorspace for businesses that require proximity to commercial centres but require the floorspace flexibility of industrial precincts.*
- *Provides new homes close to stations that provide access to jobs within 30 minutes of both the Parramatta and Sydney CBD's, as well as close to the future Sydney Olympic Park centre*

## 2.3 Redundant Industrial Land

The site represents long term, redundant industrial land with poor access, comparative isolation and low employment numbers for traditional industrial users. One third of the site is vacant land. The occupied part of the site has low employment numbers, with current tenants set to vacate site in the near future.

Cumberland LGA is well provided with industrial and urban services land. The Central City District Plan states the area has the highest proportion industrial and urban services land.

Evidence shows low demand for industrial buildings in this location (with the EILS identifying a 10% vacancy level for Clyburn) low development activity (with the EILS identifying 'marginal' development activity for Clyburn).

The Site is not directly associated with the strategically important adjoining railway uses or the intermodal terminal and auto service industry. The latter are located on the opposite side of the railway line and therefore physically separated.

Based on these indicators alone, there is no reasonable prospect of the site being used for its zoned industrial purpose under the current planning controls.

## 2.4 Deliver contemporary employment uses

The Site represents an opportunity to provide contemporary, feasible employment through new improved infrastructure and amenity. A mixed-use development provides the funding mechanism to capture the value uplift and deliver substantial public benefits including:

- infrastructure upgrades
- environmental rehabilitation
- the provision of public open space and community facilities

These benefits combined result in high worker amenity which in turn provides an incentive for future employment uses to locate on the Site.

A business only rezoning (that is, to a B5 Business Development or B7 Business Park zone) in isolation will not attract contemporary employment uses due to the lower value uplift and consequently the lack of available funding for the delivery of public benefits and associated worker amenity. In this regard, a more comprehensive approach to landuse planning for the Site (as recommended in the Amended Proposal) is warranted.

## 2.5 Delivery of residential uses, open space and community facilities

The proposed Masterplan and Landscape Plan provide an evidence urban renewal outcome, that is capable of providing high amenity for future residents, but also responds to access arrangements and adjoining industrial uses. SGS makes the following observations in relation to this critical mixed use component of the proposal:

*But beyond simply the employment potential that the proposed development provides, its innovative mix of industrial, residential and commercial would also:*

- *Maximise the site's strategic location by putting 1,150 new homes within walking distance of Auburn train station and the vibrant Auburn town centre.*
- *Provide two hectares of new open space for the community of Auburn and Cumberland. It's location adjacent the Duck River Parklands also enables it to add a significant amount of open space to this important Green corridor, designated as a major piece of Green Grid infrastructure by the GSC.*
- *Invest in the upgrade to a highly degraded stretch of the Duck River and contribute to the refocus onto the Duck River as an important community asset for the Central City.*
- *Provide additional community facilities and services, such as a child care centre and medical practices, able to be used by both future residents and the surrounding existing community.*
- *Directly and indirectly create around 5,900 new jobs in the construction and operational phases of the project.*
- *Deliver new affordable housing, and contribute to the achievement of housing targets set by the GSC.*

## 2.6 Public benefits

A mixed-use proposal provides an improved interface (less traffic and noise) with surrounding residential uses compared to the highest and best use available under the current industrial zone.

The Amended Proposal incorporates appropriate buffer areas to the adjoining rail uses. The revised planning proposal includes significant public benefits including the provision of:

- public amenities and public services
- affordable housing
- transport and infrastructure upgrades
- the enhancement of the Duck River environment

The delivery of the public benefits would not be possible under any 'highest and best use' industrial development which is permitted with consent under the current IN1 industrial zoning. Such a proposal would not result in any value uplift and would require development consent only.

Further, it would be unlikely to be subject to the voluntary planning agreement provisions of the Environmental Planning and Assessment Act 1979 (EP&A Act). While Section 7.11 contributions would be payable as a condition of consent, the delivery of the substantial public benefits listed above would not be required.

## 2.7 Single land ownership – ability to deliver timely urban renewal outcome

The site is a large, underutilised parcel of land, in single ownership, located in the geographical heart of Sydney, presenting in a unique opportunity for transition. The single ownership of such a large site ensures that the delivery of the urban renewal of the site, as outlined in the revised planning proposal, is achievable. The site satisfies the locational criteria contained in the District Plan (page 40) to qualify as an urban renewal investigation site as follows:

- accessibility to jobs
- accessibility to regional transport
- within walking distance of Auburn and Clyde rail stations.

In summary, the revised planning proposal converts an underutilised and aesthetically unpleasing Site into an active, vibrant area providing; a 75,000m<sup>2</sup> employment GFA with up to 2,612 new jobs; approximately 1,150 new dwellings; new community and retail facilities, parks and an environmental upgrade to the adjoining Duck River. The amended masterplan provides 2 distinct employment areas to cater for a variety of industrial and employment areas. As noted in the SGS analysis extract below (**BOLD** our extract)

*...this provides **opportunity for smaller-scale, local and emerging industries** to move into an established area with good accessibility to a local workforce who skills align with this role. It also provides an opportunity for the precinct to support the growth of the Parramatta CBD and Greater Paramatta to Olympic Park (GPOP) corridor...*





Figure 5. Indicative business park (Source PTW 2017)



Figure 6. Example of contemporary employment uses – Botany Quarter (Source Colliers/ Dexs)





Figure 7. Example of contemporary employment uses Banksmeadow (Source Colliers)



Figure 8. Example of contemporary employment uses – Botany Quarter (Source Colliers/Dexus)

### 3 Introduction

This report has been prepared by *KEYLAN Consulting Pty Ltd* on behalf of PAYCE Pty Ltd (PAYCE) in support of a Planning Proposal to Cumberland Council (Council) to rezone part of the Manchester Road Site in Auburn to facilitate its urban renewal and future mixed-use development.

The Proposal seeks amendments to the *Auburn Local Environmental Plan 2010* (AUBURN LEP 2010) for land at Manchester Road, Auburn (the Site).

#### **Current Planning Controls**

The Site is currently zoned *IN1 General Industrial* under the provisions of the Land Use Table in Part 2 of Auburn LEP 2010. There is one development standard for the Site which is a maximum floorspace ratio of 1:1. The Site is subject to the provisions of Clause 6.1 and an Acid Sulfate Soils Classification of Class 4 and 5.

Schedule 5 of the Auburn LEP identifies the Site and adjoining lands, collectively referred to as the *Clyde Marshalling Yards* in Rawson Street, as an archaeological item of local heritage significance.

#### **Proposed Planning Controls**

The primary purpose of this Planning Proposal is to rezone part of the Site to a range of employment, residential and open space zones to facilitate the urban renewal of the Site. The primary purpose of this Proposal is to:

1. Amend the Land Use Zoning Map to rezone 8.1ha of the Site from the *IN1 General Industrial* zone to facilitate the urban renewal of the Site as follows:
  - B7 Business Park (1ha)
  - R4 High Density Residential (5ha)
  - RE1 Public Recreation (2.1ha)
2. Retain the existing *IN1 General Industrial* zoning on the northern 6ha of the Site with the following additional uses as an amendment to *Schedule 1 - Additional permitted uses*:
  - Office premises (limited to max 10% of total GFA)
  - Car park
  - Health service facility
  - Respite day care
  - Centre-based childcare facilities
3. Amend the Height of Buildings Map to allow a maximum height limit of up to 42 metres on the residential zoned land.
4. Amend the Floor Space Ratio Map to allow a maximum FSR of 1.5:1 on the rezoned land
5. Amend the Lot Size Map to have no minimum lot size on the site.

### **Statutory Context and Guidelines**

This Amended Planning Proposal is prepared in accordance with Section 3.33 of the EP&A Act, which requires:

- (a) *a statement of the objectives or intended outcomes of the proposed instrument,*
- (b) *an explanation of the provisions that are to be included in the proposed instrument,*
- (c) *the justification for those objectives, outcomes and provisions and the process for their implementation (including whether the proposed instrument will comply with relevant directions under section 117),*
- (d) *if maps are to be adopted by the proposed instrument, such as maps for proposed land use zones; heritage areas; flood prone land—a version of the maps containing sufficient detail to indicate the substantive effect of the proposed instrument,*
- (e) *details of the community consultation that is to be undertaken before consideration is given to the making of the proposed instrument.*

This report has also been prepared in accordance with the provisions of the NSW Department of Planning and Environment's (DP&E) - *A Guide to preparing Planning Proposals August 2016*.

The report is also accompanied by a comprehensive range of specialist expert reports to support the proposed new planning regime for the Site.

These reports have helped guide the Amended Proposal to ensure it maximises the opportunities for benefits delivered with the Site, responds to its existing environmental constraints as well as ensuring that the future use as a mixed-use Precinct will have acceptable impacts on the environment, infrastructure and surrounding development / communities.

### **3.1 Consultation**

On 18 December 2017, the 2017 Proposal was lodged with Cumberland Council seeking to rezone the Site for a mixed use development. The application was placed on preliminary public exhibition from 24 January 2018 to 26 February 2018. This proposal remains undetermined.

Following the lodgement of the 2017 Proposal, PAYCE consulted with senior Council staff and briefed the elected Council on the proposal. In response to constructive feedback received from Council, public submissions and further technical input from traffic, acoustic and economic experts, the original proposal has been amended (Amended Proposal).

Formal Consultation including a community engagement program will be undertaken following Gateway determination as part of the formal public exhibition.

PAYCE propose to work in collaboration with Council. The Manchester Road community consultation will be supported by communications and information distribution, encouraging full community participation in the process.

Community and stakeholder engagement are essential parts of successful and sustainable urban development. PAYCE has built a reputation around engaging with local communities in the delivery of urban renewal projects, with recent projects including Wentworth Point, Riverwood and Victoria Park.

## 3.2 Project Objectives and Team

This report is the result of an evidence based and comprehensive assessment of the existing constraints and opportunities of the Site. The project objective is as follows:

An expert project team has been formed for the Amended Proposal as follows:

Discipline	Consultant
Town Planners	KEYLAN Consulting Pty Ltd
Urban Design	PTW Architects
Landscape Design	Context
Heritage	Casey and Lowe
Transport and Traffic	Jacobs
Employment and Economic Analysis	SGS Economics and Planning
Retail Analysis	Leyshon Consulting
Social Impact Assessment	SGS Economics and Planning
Landuse Suitability	Trace
Sustainability Report	Northrop
Noise Impact Assessment	Acoustic Logic
Odour Assessment	Pacific Environmental
Ecological Assessment	Cumberland Ecology
Infrastructure /Services/ Flooding / Stormwater	Northrop
Land Survey	LTS Lockley
Rail/ Freight Assessment	Arcadis/Neil Matthews Consulting
Visual	Ivolve Studio
Project Manager	M Projects

Table 2: Project Team



## 4 The Site and Locality

### 4.1 Site Description and History

The Site is located in the suburb of Auburn within the newly formed Cumberland Local Government Area (LGA) and was previously located in the former Auburn LGA. The suburb of Auburn is located 19 km west of the Sydney central business district in is characterised by established detached dwelling houses, retail shopping strip and industrial uses. The western railway line traverses the suburb.

The Site comprises of 2 separate parcels of land and is known as 300 Manchester Road, Auburn. The total Site area is approximately 14.12ha, which is legally described as Lots 11 and 12 of DP1166540. The Site is irregular in shape with approximate dimensions comprising of a 560m western boundary, a staggered 570m southern boundary, a 100m northern boundary and a curved 850m boundary along the north-eastern boundary.

The eastern portion of the Site (Lot 12) comprises of approximately 6ha of vacant, undeveloped land while the western portion of the Site (Lot 11) has area of approximately 8ha and is occupied by two industrial premises.



Figure 9. The Site (Source: PTW 2017)

Direct access to the Site is available from Manchester Road for a length of approximately 230m along the southern boundary. Access is also available from a Right of Way (over adjoining RailCorp land) which connects to Manchester Road and continues along the southern boundary, turning north for approx 150m and then back into the Site at a single access point along the western boundary.



The Heritage Impact Assessment (Attachment 6) states that the land was originally acquired by the Government in 1874 for the Clyde Railway workshops. Various applications describe the land as vacant with no buildings. The first buildings to be erected on the Site were railway structures. From this time, railway buildings and infrastructure started to accumulate. By 1951, the present study area was occupied by railway sidings and cuttings, and several buildings.

The Site was found to be surplus Government land and was disposed of in 1989. It has been used for non-related uses for nearly 45 years when it was originally leased to BlueScope on 20 August 1971. The State Rail Authority of NSW later sold it to Janyon Pty Ltd on 5 April 1989.

#### **4.1.1 Local Context**

The Site adjoins low density residential housing to south. The Site directly abuts a strip of RailCorp land to the west with the Duck River corridor beyond that. Low density residential development is also located on the western side of Duck River.

The Site adjoins rail uses to the north and north-east to the west. The Clyde Marshalling Yards comprise of a number of facilities servicing the Sydney Trains passenger network. These are:

- Auburn Passenger Rail Stabling Yard
- Auburn Rail Maintenance Centre
- UGL Unipart Rail Maintenance Centre
- Auburn Logistics Services Warehouse
- Auburn Network Base

In addition to the above uses, Sydney Trains has completed construction of a new state-of-the art building known as *The Hub*. The Hub consists of a 5 storey office building with 2 storey amenities building and car parking. Pedestrian pathways to Clyde Station have been upgraded as part of The Hub development.

It has been constructed on RailCorp land which is zoned SP2 Special Uses (Railway) and is located adjacent to north-western corner of the Manchester Road Site. This facility significantly changes the character of the area. The Hub is essentially a large office complex which accommodates approximately 1,500 rail workers and is the headquarters for all Sydney Train operations.

Access to these rail operations is provided by Manchester Road and the private road owned by RailCorp which is a right of way.



Figure 10. The Sydney Trains "Hub" building located to the north-west of the Site (source: TfNSW)



Figure 11. Looking east toward Manchester Road



Figure 12. The Auburn Maintenance Centre located to the north of the Site



Figure 13. The Clyde Centre Warehouse located to the north of the Site



## 4.2 Regional Context and Key Linkages

The Site is well situated between the City of Parramatta and Auburn Town Centre. It is 1.3kms from Auburn Town Centre, 4.5km from Sydney Olympic Park, 3.3km from Parramatta CBD and 17.5km from Sydney CBD. The Western Railway corridor forms a barrier to the north.

The immediate locality to the south and south-west is characterised as low density residential development. Railway and industrial uses are the predominant uses to the north-west, north and east.

The northern part of the Site is located within 800m walking distance of Clyde Train Station and the south-eastern part of the Site is within 1km of Auburn Train Station. The Site is located within 400m of several bus routes and bus stops.

Manchester Road provides the primary vehicular access point to the eastern end of the Site. Secondary access is provided by Chisolm Road from the south, connecting traffic to Mona Street, the closest vehicular crossing over Duck River.

The Site is located to the east of Duck River and is in close proximity to open space and recreational amenities. The Duck River corridor between Wellington Road and Mona street forms a network of open spaces including Auburn Botanical Gardens, Webbs Avenue Playing Fields and Mona Park. Sydney Olympic Park and its associated open space, sport, recreation and entertainment facilities are easily accessed by car from the Site (15-minute drive), however, currently less accessible by public transport.

The Cumberland LGA is one of the fastest growing areas in the Sydney Metropolitan Region and will continue to experience significant growth. The population of Cumberland LGA is projected to grow from about 226,051 in 2016 to about 304,811 in 2036, an increase of some 78,760 people or 34.84% population growth (profile.id).

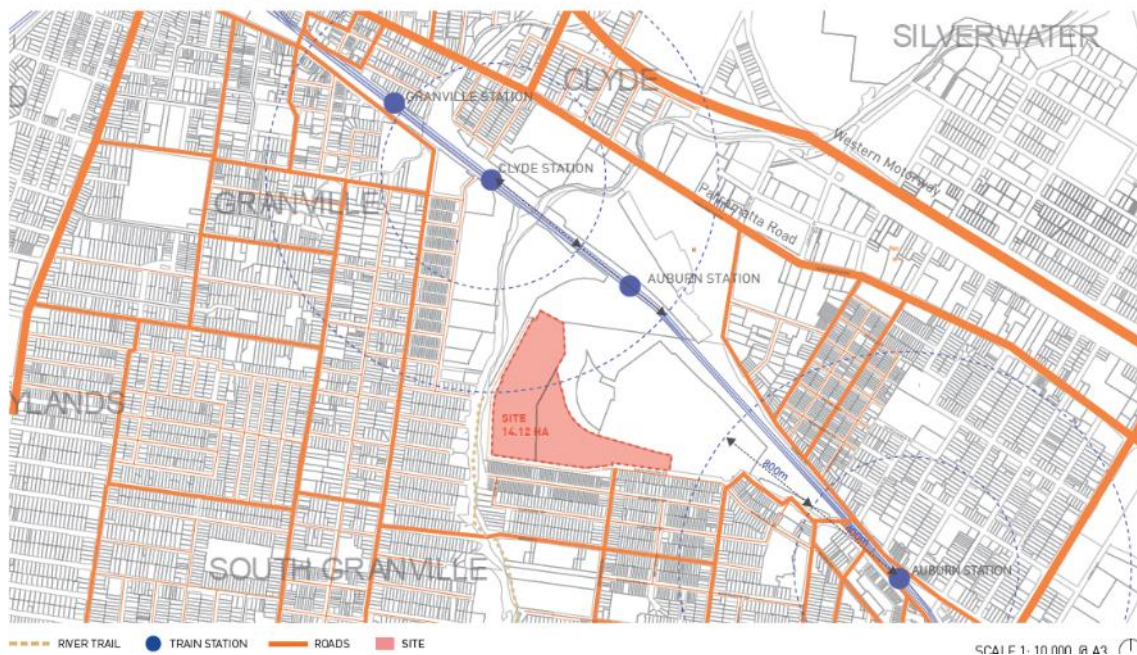


Figure 14. Key Regional Linkages (Source: PTW)





Figure 15. Regional Context (Source: PTW)

## 4.3 Characteristics of the Site

### 4.3.1 Built Form

The eastern portion of the Site comprises some 6ha of undeveloped, vacant land (Lot 12 of DP1166540), whilst the western portion contains two industrial premises (Lot 11 of DP1166540), of which BlueScope (to the south) is the only major industrial occupier. The western portion of the Site is largely impervious comprising buildings, hardstand storage and car parking. The north-eastern edge of the Site is defined by a curved wall separating the Site from rail activities to the north and east. A private road giving access to the Site and rail yards extends along the western and southern boundaries of the Site. The Site contains the following built form elements:

- BlueScope Steel warehousing operation
- large furniture Storage Building
- hard surface car parking areas
- a 14m high curved wall running along the north-eastern boundary
- an elevated, paved containment cell with ramp leading from natural ground to the top



Figure 16. Existing View of BlueScope warehouse on Site



Figure 17. View from Manchester Road entrance looking north-west toward with the Wall





Figure 18. View of furniture warehouse taken from on top of the containment cell



Figure 19. View of eastern end of Site with Manchester Road to the right

#### 4.3.2 Services

A report regarding services on and to the Site has been provided by Northrop (Attachment 8). This report describes the services available on and to the Site, outlines easement constraints and assesses the capacity of the services.

The report concludes that the outcomes of preliminary investigations suggest existing water, sewer, natural gas and electricity supply infrastructure can be augmented or extended to secure services to the new development.

#### 4.3.3 Topography

Survey information indicates that levels across the Site range between RL7.10m (western boundary) and RL14.6 (eastern boundary). The elevated containment cell has a maximum height of RL13.45.

An access ramp extends to the southern corner of the raised containment area.



Figure 20. Existing ramp and wall adjoin Railway land



Figure 21. View of existing warehouse on the Site



#### 4.3.4 Vegetation

The Site is devoid of any significant vegetation.

#### 4.3.5 Flooding

The Auburn LEP Flood Maps indicate the Site is not categorised as 'Flood Prone Land'. The Northrop Flood advice (Attachment 8), reviews the potential effects of flooding on the proposed development, particularly from Duck River and concludes the following:

- A comparison of the flood levels presented in the Flood Study Review (2012), with the surveyed levels for the Site, indicate the Site will not be inundated by floodwaters in the design 100-year ARI flood event.
- The Site is susceptible to flooding in the Probable Maximum Flood (PMF) event. The Site is categorised as a 'Low Flood Risk' area. The *Auburn Development Control Plan 2010 (Stormwater Drainage)* requires residential development within Low Flood Risk Precincts implement Flood Evacuation measures to:
  - a) *Achieve reliable access for pedestrian or vehicles from the dwelling.... to an area of refuge above the PMF level, and*
  - b) *Demonstrate the development is to be consistent with any relevant DISPLAN or flood evacuation strategy.*

The development proposed in the Amended Proposal will meet the DCP in terms of Low Flood Risk Precincts – Flood Evacuation measures.

#### 4.3.6 Contamination

PAYCE have previously commissioned DLA Environmental Services (DLA) to undertake site investigations of both Lots 11 and 12 (submitted previously):

- Stage 1 Preliminary Site Investigation for Lot 11 in DP 1166540; and
- Preliminary Land Use Suitability Review report for Lot 12 in DP 1166540 of the Manchester Road site.

##### ***Stage 1 Preliminary Site Investigation for Lot 11***

Historical research shows that Lot 11 has been predominantly used for commercial and industrial uses since the 1970s primarily for large factories. It is understood that extremely heterogeneous historical fill has been placed at Lot 11 in the past with inherent variability in the concentrations of heavy metals, TRH and PAH. Asbestos has been found to be present in surface soils.

Groundwater investigations have confirmed the presence of some elevated heavy metal concentrations. Assessment of these concentrations and neighbouring groundwater characteristics indicate these concentrations are likely to be associated with background levels and do not warrant further assessment. The Site Auditor recommended that groundwater hydrocarbon assessment around the possible on-site UST(s) may be needed upon assessment of this area in accordance with relevant guidelines and regulations.

Based on the supplied data, if Lot 11 were to be redeveloped in the future, remediation would be required to render the land to a standard consistent with the development scenario. It is therefore envisioned that a site remedial strategy specific to the proposed mid-high density residential land use will need to be developed and implemented.

The application of the former RAP prepared by (JBS&G, 12 December 2013) would therefore require reconsideration under the proposed land use change.

Localised contamination from the Site's historical activities does exist, primarily in the form of asbestos. DLA has provided preliminary recommendations to address this contamination and reduce any potential adverse impacts to the environment or human health to acceptable levels.

The Stage I PSI concludes that in its current condition, the Site can be made suitable for the future intended land use, consistent with the criteria outlined in the NEPM (NEPC, 2013) for Residential B land use criteria, following the implementation of a Remediation Action Plan and appropriate Validation. All remediation and validation works should be undertaken in accordance with the Remediation Action Plan, which is to be prepared for the intended land use, in accordance with the master plan, once rezoning has been approved.

#### **Land Use Suitability Review report for Lot 12**

Trace was commissioned to prepare a Land Use Suitability Review (LUSR) for containment cell materials at the property identified at Lot 12. The southern portion of Lot 12 is referred to as Area A and has been previously remediated (validated). While the northern portion of Lot 12 is referred to as Area B. Area B is limited to the portion of the Site which has been designated as the containment cell was the focus of this report. Both areas are shown in Figure 20 below.



Figure 22. Aerial view of Lot 12 showing the previously remediated (validated) site area and the containment cell (Source: DLA LUSR)

The Land Use Suitability Review and Stage I Preliminary Site Investigation conclude that following the implementation of a Remediation Action Plan and Validation, the site can be made suitable for the future intended land uses, consistent with the criteria outlined in the National Environment Protection (Assessment of Site Contamination) Measures.

#### 4.3.7 Geotechnical

An initial geotechnical investigation has been undertaken by DLA Environmental Services. The Site is not identified as liable to land slip or mine subsidence.

#### 4.3.8 Heritage

Clyde Railway Yards & Signal Box is listed as a heritage item in Auburn LEP 2010 as an archaeological Site and listed on RailCorp's S.170 register (under the provisions of the NSW Heritage Act 1977) as a goods yard with potential archaeological features.

The Site is listed on the Auburn LEP as an archaeological Site. This listing appears to derive from its inclusion in the Auburn Heritage Study where its heritage significance was defined as:

*The Clyde Marshalling Yard is significant in demonstrating the large volume of railway goods traffic generated by the Sydney Metropolitan area, both in historical and current terms. It also demonstrated the close relationship between local industry and rail transport.*

The Heritage Impact Assessment (Attachment 6) accompanying this Amended Proposal concludes that all present and past investigations into heritage on the Site conclude that there are no elements remaining on the Site that are relevant to its original heritage listing as part of the Clyde Marshalling Yards and contains no identified heritage elements and has been physically separated from the remaining marshalling area.

In the absence of any identified heritage structures, archaeological Sites or features, or industrial vistas within the study area, re-zoning of the study area will lead to no loss of heritage values within the Local Government Area.

## 5 Opportunities and Constraints

An Opportunities and Constraints analysis has been undertaken as part of the Site analysis and is presented in the *Urban Design Report* prepared by PTW (Attachment 1). High level images indicating the opportunities and constraints for the Site in the context of the surrounding locality are detailed below.

This work informed the proposed landuses, and indicative built form and landscape outcomes as detailed in the Masterplan and Landscape Masterplan for the Site.

### **Site Opportunities**

- single ownership to ensure certainty of delivery of enabling infrastructure, housing, affordable rental housing and future employment opportunities
- opportunity for urban renewal to activate the Site and broader Precinct that is complementary to the existing residential land uses directly adjoining the Site to the south
- improved pedestrian connectivity to Clyde, Auburn and Granville Train stations
- intersection upgrades leading to traffic improvements across the wider road network
- new employment uses to improve the vitality and mix of land uses in the local area
- opportunity for the provision of a childcare centre
- environmental upgrade of the Duck River corridor
- delivering significant public open space
- improving pedestrian accessibility to Duck River and the wider regional open space network
- remediation of existing industrial land

### **Site Constraints**

- limited road access
- potential conflict between proposed residential uses with adjoining railway uses
- contamination – location of existing central contamination cell on Site
- existing low density residential development to the south and west of the Site
- limited connectivity to surrounding areas



## 6 Planning Context

### 6.1 Auburn Local Environmental Plan 2010

The Site is zoned *IN1 General Industrial* pursuant to the Land Use Table in the *Auburn Local Environmental Plan 2010* (Auburn LEP 2010) as detailed below:

#### *Zone IN1 General Industrial*

##### *1 Objectives of zone*

- *To provide a wide range of industrial and warehouse land uses.*
- *To encourage employment opportunities.*
- *To minimise any adverse effect of industry on other land uses.*
- *To support and protect industrial land for industrial uses.*
- *To encourage economic growth of the locality.*
- *To minimise adverse effects on the natural environment.*

##### *2 Permitted without consent*

*Nil*

##### *3 Permitted with consent*

*Building identification signs; Business identification signs; Depots; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Industrial training facilities; Kiosks; Light industries; Markets; Neighbourhood shops; Places of public worship; Restaurants or cafes; Roads; Warehouse or distribution centres; **Any other development not specified in item 2 or 4***

##### *4 Prohibited*

*Agriculture; Amusement centres; Animal boarding or training establishments; Boat sheds; Camping grounds; Car parks; Caravan parks; Cemeteries; Charter and tourism boating facilities; Child care centres; Correctional centres; Crematoria; Eco-tourist facilities; Educational establishments; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Funeral homes; Health services facilities; Heavy industries; Highway service centres; Home occupations (sex services); Information and education facilities; Marinas; Mooring pens; Moorings; **Office premises**; Passenger transport facilities; Recreation facilities (major); Registered clubs; Research stations; Residential accommodation; Respite day care centres; Restricted premises; Retail premises; Rural industries; Signage; Tourist and visitor accommodation; Veterinary hospitals; Water recreation structures; Water supply systems; Wharf or boating facilities*

The Land Use Zoning Map shows that the Site is zoned *IN1 General Industrial*. An extract from the Auburn LEP 2010 zoning map is provided below.

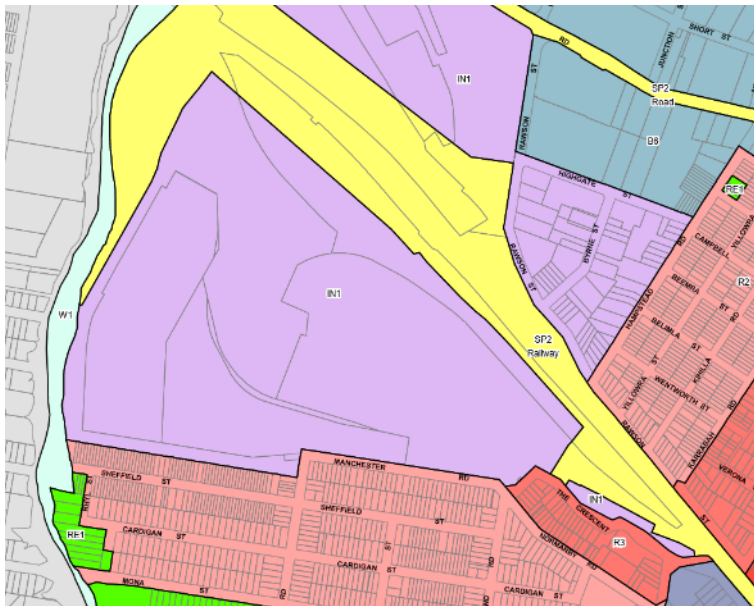


Figure 23. An extract from the Land Zoning Map (Source: Auburn LEP 2010)

Clause 4.1 of the Auburn LEP 2010 establishes minimum lots sizes for development. Clause 4.1(3) states that the size of any lot resulting from a subdivision is not to be less than the minimum size shown on the Lot Size Map. The map applies a minimum lot size of 1500m<sup>2</sup> to the Site.

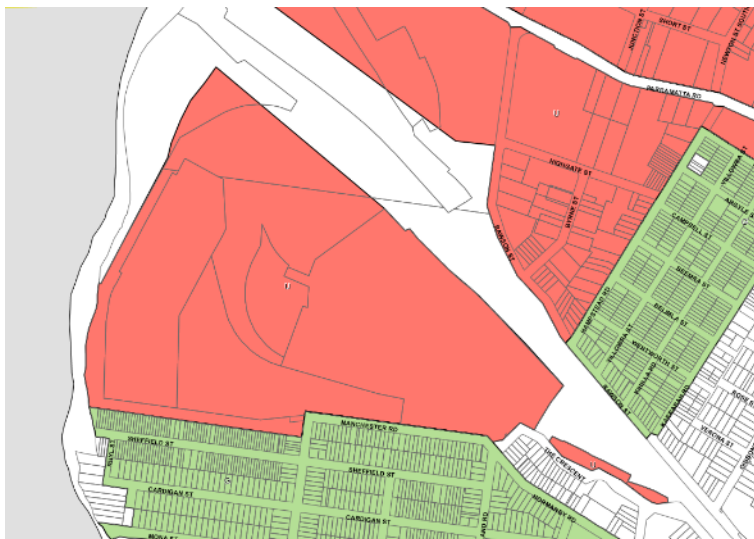


Figure 24. An extract from the Minimum Lot Size Map (Source: Auburn LEP 2010)

Clause 4.3 of the Auburn LEP 2010 establishes maximum building heights for development. Clause 4.3(2) states that the maximum height of a building is not to exceed the maximum building height shown on the Height of Buildings Map. This map does not apply a maximum building height to the Site.



Figure 25. An extract from the Height of Buildings Map (Source: Auburn LEP 2010)

Clause 4.4 of the Auburn LEP 2010 establishes a maximum floor space ratios (FSRs) for development. Clause 4.4(2) states that the maximum FSR a building on any land is not to exceed the FSR shown on the Floor Space Ratio Map. This map applies an FSR of 1:1 to the Site.

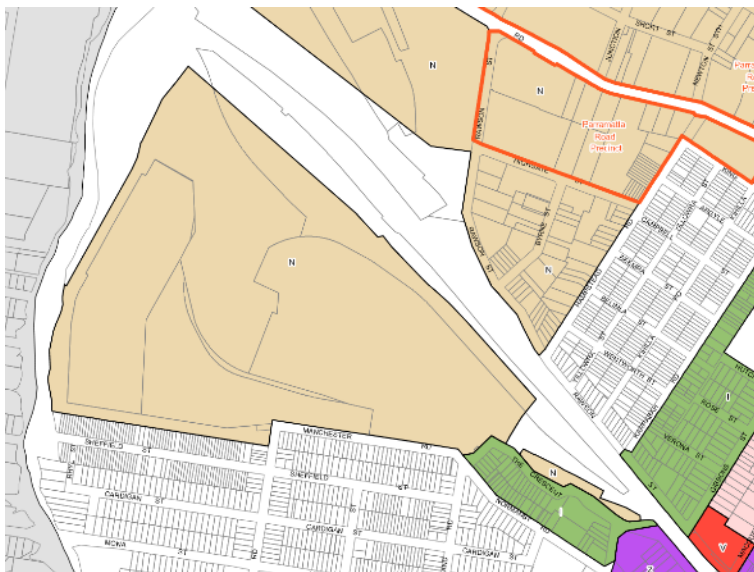


Figure 26. An extract from the Floor Space Ratio Map (Source: Auburn LEP 2010)

Clause 5.10 of Auburn LEP 2010 notes that heritage items are listed in and described in Schedule 5. The Site is included as part of a larger area which is listed as an archaeological heritage item, numbered A50 in Schedule 5 and described as *Clyde Marshalling Yards*. It is noted as having local level heritage significance.

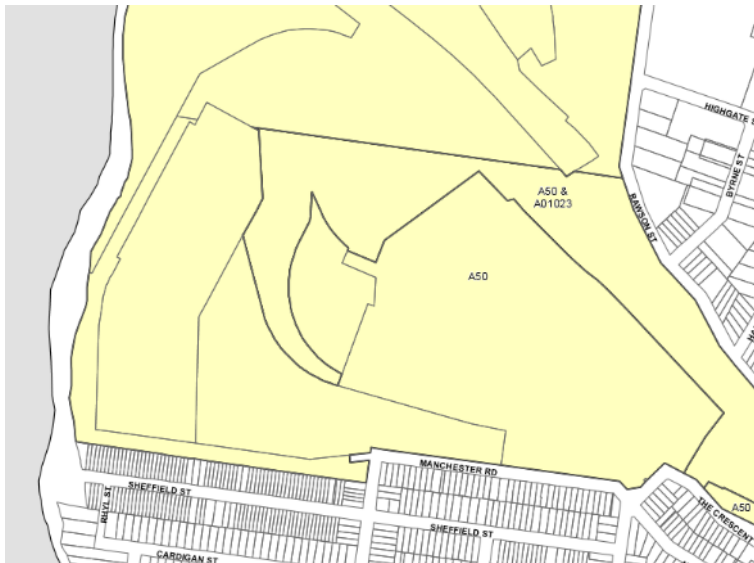


Figure 27. An extract from the Auburn LEP 2010 Heritage Map shows the Site and the adjacent Clyde Marshalling Yards is listed as an archaeological item

Clause 6.1 of Auburn LEP 2010 relates to acid sulfate soils. Clause 6.1(2) states that development consent is required for the carrying out of works described in the Table on land shown on the Acid Sulfate Soils Map as being of the class specified for those works. The map identifies the Site as being Class 4 and 5 land. These are the least sensitive classes of Acid Sulphate Soils. For works described below an acid sulfate soils management plan is required to be prepared and provided to the consent authority prior to the granting of development consent.

- For Class 4 land: Works more than 2 metres below the natural ground surface. Works by which the watertable is likely to be lowered more than 2 metres below the natural ground surface.
- For Class 5 land requires: Works more than 2 metres below the natural ground surface. Works by which the watertable is likely to be lowered more than 2 metres below the natural ground surface.

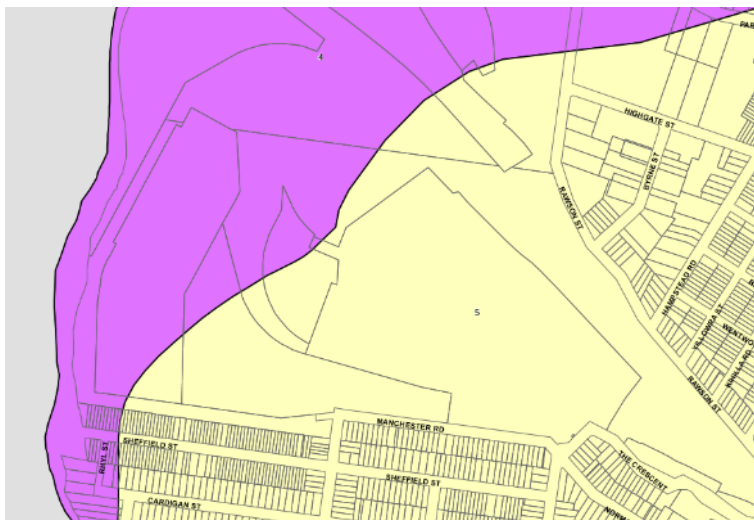


Figure 28. An extract from the Auburn LEP 2010 Acid Sulfate Soils Map shows the Site and the adjacent Clyde Marshalling Yards is listed as an archaeological item



Clause 6.4 of Auburn LEP 2010 applies to land identified as below the foreshore building line on the Foreshore Building Line Map. The Map shows that the Site is adjacent to but not affected by this control along Duck River.



Figure 29. An extract from the Auburn LEP 2010 Foreshore Building Line Map shows the Site is adjacent to but not affected by this control along Duck River

Clause 6.3 of Auburn LEP applies to land that is shown as a flood planning area on the Flood Planning Map. The Site is not located within a flood planning area.



Figure 30. An extract from the Auburn LEP 2010 Flood Prone Land Map shows the Site is not located in within the defined flood planning area

## 6.2 Auburn Development Control Plan 2010

The Auburn Development Control Plan 2010 (ADCP 2010) applies to all land within the Auburn LGA. The aims of this DCP are to:

- provide detailed controls which support the Auburn LEP 2010
- ensure high quality development across the LGA
- provide guidelines to applicants in formulating development proposals
- identify the criteria and process for assessing DAs and responsibilities
- provide development controls for Council to assess development proposals

Currently, the Industrial Development Controls Part of the ADCP 2010 applies to land zoned IN1 General Industrial, IN2 Light Industrial, B6 Enterprise Corridor and B7 Business Park and is relevant to existing zoning and uses of the Manchester Road Site.

With the proposed change to a mix of zonings, other parts of the ADCP that address residential, business and other development controls will also apply.

The Amended Proposal is supported by a Masterplan and Urban Design Report. The Urban Design Report forms the basis of a future Site specific DCP for the Site.

This report is based on the guiding principles for the redevelopment of the Site combined with more detailed urban design, public domain and landscape principles to guide future built form.

It is proposed that the Site be identified in the ADCP 2010 as a Special Precinct with its own section in the ADCP 2010.

The applicant proposes to work closely with Council on the following controls to be part of any formal public exhibition package following Gateway determination:

- Desire Future Character
- Design Principles
- Design Controls

## 7 Manchester Road Masterplan

The amended Masterplan and Urban Design Report (Attachment 1) has been prepared by PTW to support the amended Planning Proposal. This is also supported by an amended Landscape Plan prepared by Context (Attachment 2).

The Masterplan demonstrates the immediate and broader public benefits associated with the transformation of this former industrial land to a contemporary urban village with alternative employment uses, residential, open space and to respond to the evolving digital economy.

The Masterplan outlines proposed internal street layout, open space, public domain, building platforms, heights and land uses. The Masterplan seeks the following yields for the Site:

- approximately 1,150 dwellings including 58 affordable rental housing dwellings
- employment uses - 75,000m<sup>2</sup>
- retail uses (neighbourhood shops including child care) – 1,000m<sup>2</sup>
- community facility – 1,000m<sup>2</sup>

The Masterplan will allow for housing diversity with a range of apartment sizes to accommodate a wide range of residents. The Masterplan has been designed with an indicative apartment mix likely to be in the range of:

- studio apartments – 2%
- 1-bedroom apartments – 26%
- 2-bedroom apartments – 68%
- 3-bedroom apartments – 4%

The Masterplan is the result of an evidence based approach to urban design that examines the Site, strategic context, methodology, opportunities and constraints, urban design principles, landscaping and public domain.

Key vision for the site is a vibrant mixed-use community within a public domain with a distinct and memorable urban character. The success of the residential and public areas will act as a catalyst for new employment uses on the northern and eastern parts of the site.

The formulation of the Masterplan is based on the following strategies:

- provision of new employment opportunities located on the northern and eastern portions of the site, adjoining emerging employment types (note there will be no heavy industrial uses permitted);
- provision a range of apartment types in close proximity to public transport, integrated with high quality open space areas that respond to an increase in population;
- provision of new built form to spatially define new pedestrian linkages and new public open space areas as an attractive urban precinct;
- provision of modulated built form that will accommodate differences in housing choice, reflecting changes in household size and lifestyle choices;
- acknowledgment of the site's strategic location with linkages to adjoining existing urban pattern; and

- the transition from a former large scale heavy industrial site to a finer grained, more densely populated and mixed use community.

The Masterplan divides the Site into 4 key focus areas or precincts within the Site with attention to the existing streetscape and neighbourhoods as follows:

- Northern Employment Area
- Eastern Employment Area
- Large Central Park
- Residential area with neighbourhood shops and a community facility

The Masterplan provides certainty for future landuses and built form and is proposed to form the basis of a DCP for the Site and informs the LEP planning controls for the Site.



Figure 31. Manchester Road Masterplan (Source: PTW 2018)



## 7.1 Landscape Concept Plan

A Amended Landscape Concept Package has been prepared by Context (Attachment 2) to inform the amended Masterplan for the Site.

The plan incorporates 6 major zones:

1. Duck River Riparian Corridor
2. Employment Lands
3. Central Park
4. Residential Precincts
5. Streetscapes
6. Pedestrian Laneways

In broad terms, the landscape proposal mimics the natural gradation of planting types as it radiates away from the riverside with riverside species dominating in the west and streetscapes fronting the river. Further from the river, a greater diversity of species is used including the introduction of deciduous exotics such as Jacaranda and Crepe Myrtle to add colour and allow winter sun to penetrate into the Site.



Figure 32. Manchester Road Landscape Concept Plan (Source: Context 2018)



Figure 33. *Proposed landscaping treatment Duck River interface (Source: Context 2018)*



Figure 34. *Proposed landscaping treatment Employment areas (Source: Context 2018)*



Figure 35. *Proposed landscaping treatment employment areas (Source: Context 2018)*

## 8 The Planning Proposal

### 8.1 Vision and Guiding Principles

The Urban Design Report (Attachment 1) details the vision for the site as follows:

*...a vibrant mixed-use community within a public domain which would have distinct and memorable urban character. The success of this development will act as a catalyst for new employment uses within the area. This large and amalgamated site has the potential for new employment uses with greater residential density...*

The Amended Proposal seeks to achieve this Vision by allowing a mixed-use development with a range of employment, residential, neighbourhood shops and community uses.

The amended Masterplan adopts the following strategies:

- *Provide new employment opportunities.*
- *Provide a range of housing type in close proximity to public transport, integrated with high quality open space areas that respond to an increase in population*
- *Provide new built form to spatially define new pedestrian linkages and new public open space areas as an attractive urban precinct*
- *Provide modulated built form that will accommodate differences in housing choice, reflecting changes in household size and lifestyle choices*
- *Confirm the site's strategic location with linkages to adjoining existing urban pattern*
- *The contribution of this development site to the transition from a former large scale heavy industrial site to a finer grained, more densely populated, and mixed use community.*

The Amended Proposal seeks to achieve the Vision by proposing amendments to the *Auburn LEP 2010* by rezoning 8.1ha of the Site to residential, recreation and business zones. The Proposal will progress with a VPA offer to secure public benefits and a DCP to give greater certainty on built form and public domain outcomes.

The amended Masterplan and Urban Design Report (Attachment 1) provide an analysis, key connections, built form, landscaping, public domain and streetscape which forms the basis of the proposed LEP provisions.

This comprehensive analysis combined with the wide range of multi-disciplinary reports support a future built form up to 12 storey buildings and a variety of land uses to support future employment, while not resulting in any significant adverse environmental or amenity impacts on the surrounding locality.

### 8.2 Explanation of provisions

The Amended Proposal seeks amendments to the *Auburn Local Environmental Plan 2010* (Auburn LEP 2010) for land at Manchester Road, Auburn (the Site).

The primary purpose of the Proposal is to rezone an area of 8.1ha from the *IN1 General Industrial* zone to a range of business, residential and open space zones to facilitate the urban renewal of the Site.

The Amended Proposal also seeks more appropriate built form controls, seeking a new maximum height limit of up to 42 metres/12 storeys, with a floorspace ratio of 1.5:1 on the rezoned land.

The Amended Proposal will nominate a maximum of 77,000m<sup>2</sup> of non-residential land uses across the Site to promote employment uses with 2,000m<sup>2</sup> (neighbourhood shops, community facility and possibly a childcare centre) within the R4 residential zone and 75,000m<sup>2</sup> in the retained industrial/business zones.

It is proposed the heritage item listing on the Site be retained.

Summary of Proposed LEP Amendments		
Current Auburn LEP 2010		Proposed
Land Zoning Map	IN1 General Industrial	<ul style="list-style-type: none"> <li>• Retain northern 6ha of Site as IN1 General Industrial</li> <li>• Rezone southern 8.1ha of land to:               <ul style="list-style-type: none"> <li>• B7 – Business Park</li> <li>• R4 – High Density Residential</li> <li>• RE1 – Public Recreation</li> </ul> </li> </ul>
Minimum Lot Size	1,500m <sup>2</sup>	Amend the Lot Size Map to have no minimum lot size on the site
FSR	1:1	1:1 on northern, industrial 6ha 1.5:1 on southern 8.1ha
Height of buildings	No height limit	No height limit on northern 6ha Maximum height 42 metres (12 storeys) on southern 8.1ha
Heritage Map	Listed in Schedule 5	No change
Acid Sulphate Soils	Class 4 and 5	No change
Additional Permitted Uses	No additional uses permitted on subject site	Amend Schedule 1 to permit the following additional uses on the northern 6ha of the site: <ul style="list-style-type: none"> <li>• Office premises (limited to max 10% of total GFA)</li> <li>• Car park</li> <li>• Health service facility</li> <li>• Respite day care</li> <li>• Centre-based child care facility</li> </ul> Identify northern 6ha of Site on the Additional Permitted Uses Map

Table 3: Summary of proposed LEP amendments

It is proposed that the Site be identified in Part 4 of the *Auburn Development Control Plan 2011* as a *Special Precinct*. PAYCE proposes to work closely with Council staff on appropriate controls to be part of any formal public exhibition package following Gateway determination.

A VPA is also proposed to be progressed in parallel with the Planning Proposal.



### 8.2.1 Rationale for Proposed Land Use Controls

This Planning Proposal and supporting reports makes the case for change to rezone the Site from an *IN1 General Industrial* zone to a range of other zones. The consideration of appropriate zones and key built form controls (height and FSR) follows an evidence-based approach which investigated in detail the economic, environmental (including traffic and transport) and social impacts of a new mixed-use development of the Site.

A planning justification and rationale for these proposed land use zones and key built form controls is detailed below.

#### **Proposed Land Use Zones**

The proposed zones for the Site are considered the most appropriate to deliver the desired future outcomes as detailed in the Masterplan for the Site.

Proposed Zone	Planning Justification
<b>IN1 General Industrial</b>	<ul style="list-style-type: none"> <li>• Maintain the existing zone with additional permitted uses;               <ul style="list-style-type: none"> <li>• <i>Office premises</i> (limited to max 10% of total GFA)</li> <li>• <i>Car park</i></li> <li>• <i>Health service facility</i></li> <li>• <i>Respite day care</i></li> <li>• <i>Centre-based child care facility</i></li> </ul> </li> </ul>
<b>B7 Business Park</b>	<ul style="list-style-type: none"> <li>• This zone will allow for office and light industrial uses, including high technology industries, warehouse and distribution centres.</li> <li>• Possible uses include services, creative industries, start-up/incubator businesses and small scale wholesale.</li> <li>• The proposed campus-style business park on this site is envisaged to comprise of 3 x 4 storey buildings.</li> <li>• The zone will also permit a range of ancillary facilities and services to support the day-to-day needs of workers, such as 'kiosk,' 'centre-based child care facilities' and 'neighbourhood shops.'</li> </ul>
<b>R4 High Density Residential</b>	<ul style="list-style-type: none"> <li>• The R4 High Density residential zone is the most appropriate zone to deliver the desired urban outcomes for the Site and provide housing choice to meet projected demand for the LGA.</li> <li>• The objectives of this zone exist in Auburn LEP 2010 and will ensure that future development will provide for high quality housing to meet the needs of the community.</li> <li>• This zone allows for the provision of large areas of dedicated active and passive open space and high quality public domain outcomes and a range of other public benefits as detailed in this Planning Proposal both within and outside the Site (Section 1 of this report). The zoning of roads is consistent with the approach taken in Auburn LEP 2010.</li> <li>• This zone allows for future residential development that best responds to the existing constraints of the Site, including the existing adjoining railway lands</li> <li>• This zone will ensure that future land uses are restricted to residential uses (and community uses/other uses including neighbourhood shops which serve the community consistent with the existing zoning objectives and permissible uses).</li> </ul>

Proposed Zone	Planning Justification
	<ul style="list-style-type: none"> <li>Essential to the success of this zone is the relationship with the proposed height and FSR maps that ensure that buildings with the maximum heights are appropriately located.</li> </ul>
<b>RE1 Public Recreation</b>	<ul style="list-style-type: none"> <li>The RE1 Public Recreation zone is the most appropriate zone for the areas of proposed public open space.</li> <li>This ensures that large areas of open space are dedicated to Cumberland Council, providing a valuable resource for the wider community for opportunities for passive and active recreation.</li> </ul>

Table 4: Summary of proposed LEP zones

The proposed land use zones are illustrated below.



Figure 36. Proposed changes to the Land Use Zoning Map (Source: PTW)

The proposed zones as detailed in the Auburn LEP 2010 are detailed below indicating objectives and permissible uses.

#### **Zone IN1 General Industrial**

##### **1 Objectives of zone**

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To encourage economic growth of the locality.
- To minimise adverse effects on the natural environment.

##### **2 Permitted without consent**

Nil

### 3 Permitted with consent

*Building identification signs; Business identification signs; Depots; Freight transport facilities; Garden centres; General industries; Hardware and building supplies; Industrial training facilities; Kiosks; Light industries; Markets; Neighbourhood shops; Places of public worship; Restaurants or cafes; Roads; Warehouse or distribution centres; Any other development not specified in item 2 or 4*

### 4 Prohibited

*Agriculture; Amusement centres; Animal boarding or training establishments; Boat sheds; Camping grounds; Car parks; Caravan parks; Cemeteries; Charter and tourism boating facilities; Centre-based child care facilities; Correctional centres; Crematoria; Eco-tourist facilities; Educational establishments; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Funeral homes; Health services facilities; Heavy industries; Highway service centres; Home occupations (sex services); Information and education facilities; Marinas; Mooring pens; Moorings; Office premises; Passenger transport facilities; Recreation facilities (major); Registered clubs; Research stations; Residential accommodation; Respite day care centres; Restricted premises; Retail premises; Rural industries; Signage; Tourist and visitor accommodation; Veterinary hospitals; Water recreation structures; Water supply systems; Wharf or boating facilities*

## **Zone B7 Business Park**

### 1 Objectives of zone

- To provide a range of office and light industrial uses.
- To encourage employment opportunities.
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.
- To encourage creation of well-designed and sustainable business park developments.
- To provide the flexibility required to encourage a range of office uses in the zone.
- To create an accessible and safe public domain.
- To maximise opportunities to increase walking, cycling and public transport use.
- To minimise adverse effects on the natural environment.

### 2 Permitted without consent

*Nil*

### 3 Permitted with consent

*Building identification signs; Business identification signs; Centre-based child care facilities; Food and drink premises; Garden centres; Hardware and building supplies; Kiosks; Light industries; Markets; Neighbourhood shops; Office premises; Passenger transport facilities; Respite day care centres; Roads; Warehouse or distribution centres; Any other development not specified in item 2 or 4*

### 4 Prohibited

*Agriculture; Air transport facilities; Amusement centres; Animal boarding or training establishments; Boat building and repair facilities; Boat sheds; Business premises; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Correctional centres; Crematoria; Eco-tourist facilities; Electricity generating works; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Heavy industrial storage establishments; Highway service centres; Home occupations (sex services); Industrial training facilities; Industries; Information and education facilities; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Port facilities; Recreation facilities (major); Registered clubs; Research stations; Residential accommodation; Restricted premises; Retail premises; Rural industries; Sewerage systems; Sex services premises; Signage; Tourist*

and visitor accommodation; Transport depots; Veterinary hospitals; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities

#### **Zone R4 High Density Residential**

##### **1 Objectives of zone**

- To provide for the housing needs of the community within a high density residential environment.
- To provide a variety of housing types within a high density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To encourage high density residential development in close proximity to bus service nodes and railway stations.

##### **2 Permitted without consent**

Nil

##### **3 Permitted with consent**

Attached dwellings; Bed and breakfast accommodation; Boarding houses; Building identification signs; Business identification signs; Child care centres; Community facilities; Hostels; Hotel or motel accommodation; Multi dwelling housing; Neighbourhood shops; Places of public worship; Residential flat buildings; Respite day care centres; Roads; Semi-detached dwellings; Shop top housing; Any other development not specified in item 2 or 4

##### **4 Prohibited**

Agriculture; Air transport facilities; Amusement centres; Animal boarding or training establishments; Boat building and repair facilities; Boat sheds; Camping grounds; Car parks; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Heavy industrial storage establishments; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Information and education facilities; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Passenger transport facilities; Port facilities; Recreation facilities (major); Registered clubs; Research stations; Residential accommodation; Restricted premises; Rural industries; Service stations; Sewerage systems; Sex services premises; Signage; Storage premises; Tourist and visitor accommodation; Transport depots; Vehicle body repair workshops; Vehicle repair stations; Veterinary hospitals; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies

#### **Zone RE1 Public Recreation**

##### **1 Objectives of zone**

- To enable land to be used for public open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.
- To protect open space at riparian and foreshore locations.

##### **2 Permitted without consent**

Nil



### 3 Permitted with consent

*Child care centres; Community facilities; Depots; Environmental facilities; Environmental protection works; Function centres; Information and education facilities; Kiosks; Markets; Places of public worship; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Respite day care centres; Restaurants or cafes; Roads; Water recreation structures*

### 4 Prohibited

*Any development not specified in item 2 or 3*

## **Amend Schedule 1 - Additional Permitted Uses**

It is proposed to allow the following additional permitted uses on the retained 6ha of industrial zoned land:

- *Office premises (limited to max 10% of total GFA)*
- *Car park*
- *Health service facility*
- *Respite day care*
- *Centre-based child care facility*

These uses are defined in the Dictionary of Auburn LEP 2010 as follows:

**office premises** means a building or place used for the purpose of administrative, clerical, technical, professional or similar activities that do not include dealing with members of the public at the building or place on a direct and regular basis, except where such dealing is a minor activity (by appointment) that is ancillary to the main purpose for which the building or place is used.

**car park** means a building or place primarily used for the purpose of parking motor vehicles, including any manoeuvring space and access thereto, whether operated for gain or not.

**health services facility** means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following:

- (a) a medical centre,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) patient transport facilities, including helipads and ambulance facilities,
- (e) hospital.

**respite day care centre** means a building or place that is used for the care of seniors or people who have a disability and that does not provide overnight accommodation for people other than those related to the owner or operator of the centre.

**centre-based child care facility** means:

- (a) a building or place used for the education and care of children that provides any one or more of the following:
  - (i) long day care,
  - (ii) occasional child care,
  - (iii) out-of-school-hours care (including vacation care),
  - (iv) preschool care, or

*(b) an approved family day care venue (within the meaning of the Children (Education and Care Services) National Law (NSW))*

The inclusion of these additional uses will provide more employment opportunities and greater flexibility on the retained industrial zoned land.

*Office premises* is a use that is consistent with that of the Sydney Trains headquarters known as The Hub, constructed in 2017, which comprises of a five-storey office building/logistics centre and is located to the north-west of the Site. The limitation of 10% on the GFA of office premises will protect future employment lands, by allowing flexibility for future contemporary employment uses (e.g. ability for shared office space)

### ***Proposed amendments to Height of Buildings Map***

The proposed built form is underpinned by the strategic direction to transform the Site as indicated in the Masterplan as demonstrated through the following principles:

- building heights are generally graded across the site from east to west
- a mix of studio, 1-bedroom, 2-bedroom and 3-bedroom apartments are proposed
- higher buildings are located away from adjoining and existing residential uses
- the proposed built form respects the hierarchy of existing centres in Cumberland

The amended Urban Design Report prepared by PTW outlines the guiding principles, methodology, opportunities and constraints, urban design principles, landscaping and public domain features. The Report investigates several focus areas or precincts within the Site, considers potential impacts on adjoining properties and considers the existing and evolving character of the locality.

These investigations also carefully examine the Site conditions, noting that the centre of the Site contains an elevated contamination containment cell.

The building height and density strategy seeks to optimise the proximity of the Site to good rail services at both Clyde and Auburn train stations, while respecting the scale and built form of residential development to the south.

The Amended Proposal seeks a range of building heights, according to the proposed Masterplan, ranging in height from 15 metres to 42 metres (up to 12 storeys). This is based on an average assumed floor to floor height of 3.1 metres.

This 42-metre height limit is proposed in 2 central locations only and is required to allow for car parking above the contamination cell. This strategy responds to the existing landform and constraints of the site and does not lead to any adverse amenity impacts.

The proposed amendments sought to the Height of Buildings Map in Auburn LEP 2010 are illustrated in the Figure below.



Figure 37. Proposed changes to the Height of Building Height Map (Source: PTW)

The Proposal seeks to amend the height of buildings controls in Auburn LEP 2010 to introduce height controls and permit maximums of:

- 15m in areas coloured beige enabling development between 1 - 4 storeys
- 27m in areas coloured pink enabling development up to 8 storeys
- 33m in 2 areas coloured crimson between 6 - 12 storeys
- 42m in areas above the contamination cell (coloured maroon) enabling development up to 12 storeys

#### ***Proposed amendments to the Floor Space Ratio Map***

In terms of proposed floorspace ratio (FSR), the Proposal seeks to:

- retain an FSR of 1:1 for the northern 6ha of the Site
- permit a maximum gross FSR of 1.5:1 for the remaining 8.1ha of the Site

The proposed FSR is generally within the range set by the Auburn LEP 2010 which includes FSRs with a range of 1:1 to 2.6:1 for existing R4 High Density Zones. The proposed FSR of 1.5:1 is toward the lower end of this range.

This FSR is appropriate for the desired built form outcomes given the size and opportunities to provide significant areas of open space, with a total of 2.2ha of publicly accessible open space.



Figure 38. Proposed changes to FSR Map (Source: PTW 2017)

### **Proposed amendments to the Lot size Map**

A minimum lot size of 1,500m<sup>2</sup> currently applies to the site.

The Proposal seeks to amend the Lot size Map in Auburn LEP 2010 to remove the minimum lot size requirement, that is, to have no minimum lot size control for the site.

This will allow realisation of the amended Masterplan which incorporates a range of lot sizes from super lots to smaller lots for the terrace housing fronting Manchester Road.



## 8.3 Justification

### 8.3.1 Section A – Need for a Planning Proposal

#### ***Is the Planning Proposal a Result of Any Strategic Study or Report?***

The Amended Proposal is the outcome of a number of strategic studies and reports. The Proposal is also supported by a wide range of technical reports including traffic and transport, urban design and environmental studies.

The key studies that underpin the Site's transition from traditionally industrial zoned land to a mixed-use precinct are the economic studies undertaken by:

- the SGS Group on behalf of PAYCE
- the adopted *Auburn Employment Lands Strategy 2015*
- *Cumberland Council's Draft Employment and Innovation Lands Strategy 2017*

These studies are summarised with further analysis below.

#### ***Auburn Employment Lands Strategy 2015 (the current adopted Strategy)***

The *Auburn Employment Lands Strategy* (ELS) report was prepared by AEC for the former Auburn City Council and adopted by Council in December 2015. The Strategy was commissioned to enable the Council to plan for future employment growth and change in the LGA, particularly on land covered by industrial or business zones.

The ELS relates to lands zoned for employment within the Auburn LGA (those lands within the industrial and business zones in the LEP) and focuses on land for retail, commercial or industrial activities. To align with other longer-term State and local strategies and policies, the strategy has a 17-year horizon to 2031.

The ELS draws together economic and property market research and employment growth projections to ascertain the likely nature and quantum of demand for employment lands (including centres) within the former Auburn LGA.

The study area for the report included a series of employment precincts within the former Auburn LGA, categorised as either industrial or business zoned areas. For each precinct, the report considered factors including whether existing planning controls were appropriate, sustainable, and likely to accommodate future business, industry and community needs.

The Site is part of Precinct 9, which is primarily comprised of the Clyde Marshalling Yards, and includes the warehouses occupied by RailCorp in the south-east portion, the BlueScope Steel distribution facility, and vacant parcels of land. It is important to note that the Precinct 9 and 12 are separated by the railway lines and that analysis of Precinct 9 encompasses the Site, but also includes a substantial area which is not part of the site, as illustrated below.



Figure 39. Map of Clyburn (Precinct 9) (Source: Auburn ELS 2015)

The ELS highlights that the viability and sustainability of lands for continued industrial use is underpinned by their ability to:

- be directly accessed off major arterial roads and highways.
- operate in a conflict-free environment
- cluster with other businesses and industry

The study identifies the Clyburn precinct as strategically important due to its linkages with continued rail operations. The study's high-level position however means that the role and function of different parts of the precinct were not undertaken and so no clear link – or distinction - has been made between the Site's role and that of the wider precinct. This position follows on from the 2008 Subregional Plans which also identify it as strategically important and to be retained.

Under its employment growth scenarios, the Auburn ELS projected that the whole of the precinct would have an additional 7,900 square metres of floorspace between 2011 and 2031, and an additional 418 jobs.

The Strategy identifies Precinct 9 as having several competitive features, including: its location adjacent to the rail corridor – It is identified as part of Sydney's wider freight plan and in *A Plan for Growing Sydney* as one of the Intermodal Terminals within the freight network.

The ELS highlights that flexible planning controls are key to assisting industries and businesses as they continue to transition during structural economic change. Not meeting the changing needs of industrial activities will result in high levels of vacancy and undermine viability and sustainability. The ELS contains recommendations for each Precinct. For Clyburn, 2 scenarios are presented, dependant on whether long-term access can be resolved.

An analysis of the Amended Proposal in the context of the ELS recommendations is contained later in this report with the conclusion that, should access issues across the railway line not be resolved, land use changes will be required for parts of the precinct.

### ***Draft Cumberland Council Employment and Innovation Lands Strategy and Land Use Planning Framework***

The Cumberland Draft Employment and Innovation Lands Strategy and Land Use Planning Framework (Draft EILS) 2017 has been undertaken by a consultant team comprising of AEC Group and Mecone on behalf of Auburn City Council. The Draft EILS aims to promote *firmer and innovative employment, business and economic outcomes for Cumberland through development of a Land Use Planning Framework*.

The key implications for employment and innovation lands for the whole LGA identified in the report are:

- demand for accessible lands close to customers and labour pools will increase with the rise and growth of Parramatta
- use of high knowledge workers, increased automation and shorter distribution chains will increase as businesses seek to value add and improve efficiency/productivity
- logistics will remain the dominant driver of demand with new warehousing models emerging, and will include strong demand for small-scale facilities
- Cumberland is well-placed to capture emerging demand from re-shored manufacturing facilities, with a large labour and consumer market
- the fit-out and configuration of warehouses will evolve with the use of robots and supply chain efficiencies, with the potential need for greater heights and FSRs
- more traditional industry sectors are likely to depart the LGA. As such, Cumberland has the opportunity to attract businesses across a range of other industrial activities – including those focused on warehousing and distribution, and manufacturing industries in knowledge, technology, innovation and value adding activities

Overall for the LGA, the report recommended that in the short-term, employment and innovation lands should be retained, in line with the ‘precautionary approach’ of the Greater Sydney Commission (since superseded by the retain and manage principle contained in the Region Plan); that freight network planning be undertaken to support the viability of related businesses; and that an ‘Innovation Toolbox’ of planning mechanisms be developed to allow Council to incentivise and grow innovative businesses within the LGA’s employment lands.

The key sectors identified in the Draft EILS for focus and growth are:

- advanced manufacturing
- food and beverage manufacturing
- digital technologies and media
- advanced knowledge services
- creative industries
- fashion
- allied health
- freight and logistics

The Draft EILS outlines the current competitive advantages that the Cumberland LGA has in relation to these industries, based on its employment profile from the 2011 Census and benchmarked to both Parramatta and Greater Sydney.

Freight and logistics are shown to be a significant competitive advantage for the LGA, being highly represented in employment and contributing significantly to both value-add and the

share of wages paid. Advanced manufacturing has a significant employment base, and contributes more than its share of employment in value add and wages, though the report found fewer specialist skills associated with the sector than those in Freight and Logistics.

The LGA was also found to have competitive advantages Food and Beverage Manufacturing based on its existing employment profile, where it contributes more than its share of employment in wages and industry value add, though it is a smaller sector.

Compared to both Parramatta and Greater Sydney, the LGA was found to have a lower prevalence of employment in Digital Technologies and Media, Creative Industries, and Allied Health.

In relation to the other sectors, the LGA had a higher prevalence of both Advanced Knowledge Services and Fashion compared to Parramatta, but a lower prevalence than Greater Sydney.

The Draft EILS identifies that there will be opportunities for Cumberland in:

- the development of business and supply chain clusters – using existing employment lands to support innovation, capitalising on proximity to transport networks and in attracting new businesses
- research and development – catalysed by proximity to a university, hospital or research organisation
- technology and creative industries – being able to accommodate and grow high knowledge and creative jobs, which typically gravitate to areas with retail amenity, transport access, and proximity to major centres like Parramatta
- artisan industry – ethnically diverse population could be leveraged for their artisanal skills and contribute to the overall uniqueness and character of the LGA, and could be housed anywhere, including in existing centres

The site is included as part of the Clyburn precinct, 1 of 15 precincts analysed in the Draft EILS. The revised Clyburn precinct incorporates a larger area than previously included in the Clyburn precinct in the adopted EILS, including part of precinct 12, the more accessible industrial area north of the rail line.

**The combining of the 2 areas is not supported as the area north of the railway is completely separated from the area south of the railway line by the railway line itself. There is no direct connection or relationship between these two distinct areas.**

The Draft EILS identifies Clyburn as being characterised by small industrial factory units, large warehouse sheds, and big box retail sheds, with generally smaller lots, with the major land uses being in automotive industries, warehousing, bulky goods and industrial supplies. The ageing of existing factory units, and a lack of public car parking leading to road congestion is identified as an issue for the precinct. This description is relevant to the area north of the railway line.

The Draft EILS notes that within the precinct there is a general lack of development activity in either new buildings or additions. It also notes the designation of the Clyde area as an intermodal terminal, and its relatively strong level of access to the M4 Motorway, Parramatta Road, and the T1 Western rail line, with its main competitors in terms of industrial precincts being Silverwater, Lidcombe West, and Rydalmere.



The Draft EILS sets out a vision for the Clyburn precinct as focusing on providing 'Services for the Service Sector,' including high-value activities crucial to the city's metabolism, such as:

- Manufacturing
- Maintenance
- Rails maintenance
- Waste management
- Recycling
- Wholesale and
- Logistics

The Draft EILS suggests principles, barriers and actions for the Clyburn Precinct. These are summarised below:

*Planning principles:*

- to ensure that functional industrial and logistical uses are maintained to support industrial, logistical, transport, freight and waste uses
- improve the desirability of the precinct for business by providing vehicular access across the rail line
- transport, logistics and freight industries continue to be targeted for the precinct, along with employment uses and businesses that can co-exist with these uses

*Barriers:*

- vehicular access to the precinct is the biggest constraint on businesses, particularly crossing the railway line and in this regard the Draft EILS recommends that Council investigate new rail crossing with the NSW Government
- residential growth is an issue and the Draft EILS recommends that any new residential development should not impact on the viability of these existing uses

*Actions:*

- in the short term, the Draft EILS suggests that employment uses in the precinct should be retained, in line with the 'Services for the Service Sector' vision for the site, and that Council should engage with the NSW Government on improving rail crossings and including this in strategic planning
- in the medium-term, the Draft EILS recommends no precinct specific changes, as achieving the vision for the precinct is possible under the current planning framework

An analysis of the recommendations for the Clyburn precinct contained in the Draft EILS is contained later in this report which recommends site specific amendments to the policy to support the Amended Proposal.

***Is the Planning Proposal the Best Means of Achieving the Objectives or Intended Outcomes, or is there a Better Way?***

The Amended Proposal is the best and most appropriate means of achieving the desired future redevelopment of the Site. As demonstrated in this Report, the current zoning and built form controls do not allow the Site to be developed in a manner that will deliver a sustainable urban framework, built form outcomes, open space or sufficient employment densities.

The current zoning and landuse controls sterilise the Site for future mixed use and residential outcomes to meet the future population demands of the Cumberland LGA and broader region.

The economic justification in this Report and accompanying technical reports undertake an evidence-based approach which demonstrates the current zoning is inappropriate. Further investigation into other employment uses for the Site indicate that a mixed use zoning will provide the amenity sought by contemporary employment uses, combined with upgraded local infrastructure and open space to allow the Site to support a new residential community.

The existing planning controls do not adequately address the required land uses to redevelop this degraded and underutilised site or the required built form controls to ensure traffic, environmental and other potential impacts on adjoining properties and surrounding neighbourhood can be comprehensively addressed and mitigated.

Accordingly, the proposed rezoning of the Site through an amendment to the Auburn LEP 2010 is the most appropriate method to deliver the desired outcomes.

### 8.3.2 Section B - Relationship to Strategic Planning Framework

*Is the Planning Proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?*

#### **Premier's Priorities (updated 2018)**

The NSW Premier announced in 2015 the 12 priorities for the state. In June 2018, the Premier provided an update on the 12 Premier's Priorities. These priorities remain relevant to the current Premier and were updated in June 2018. Government's key areas of focus include transport, health, education, environment, police and justice, infrastructure, family and community services, economy and accountability.

- |  |  |
|--|--|
| • <i>Creating jobs</i>                         | • <i>Protecting our kids</i>             |
| • <i>Delivering infrastructure</i>             | • <i>Reducing youth homelessness</i>     |
| • <i>Reducing domestic violence</i>            | • <i>Driving public sector diversity</i> |
| • <i>Improving service levels in hospitals</i> | • <i>Keeping our environment clean</i>   |
| • <i>Tackling childhood obesity</i>            | • <i>Making housing more affordable</i>  |
| • <i>Improving education results</i>           | • <i>Improving Government services</i>   |

The Amended Proposal is consistent with the relevant priorities in particular, creating jobs; making housing more affordable; delivering infrastructure; tackling childhood obesity (through improved open space, active transport choices and healthy environments); and keeping our environment clean.

#### **NSW Draft Centres Policy 2009**

In 2009, the then Department of Planning released the *Draft Centres Policy – Planning for Retail and Commercial Development*. The document was released as a *Consultation Draft* and endorsed *Not Government Policy*. Notwithstanding its current status (presently unknown), the Draft policy outlines key principles which should apply to the planning of centres:

- retail and commercial activity should be located in centres to ensure the most efficient use of transport and other infrastructure, proximity to labour markets, and to improve the amenity and livability of those centres
- the planning system should be flexible enough to enable centres to grow, and new centres form
- the market is best placed to determine the need for retail and commercial development
- the role of the planning system is to regulate the location and scale of development to accommodate market demand
- the planning system should ensure that the supply of available floorspace always accommodates the market demand, to help facilitate new entrants into the market and promote competition
- the planning system should support a wide range of retail and commercial premises in all centres and should contribute to ensuring a competitive retail and commercial market
- retail and commercial development should be well designed to ensure it contributes to the amenity, accessibility, urban context and sustainability of centres

The Draft Policy also introduces the concept of a *Net Community Benefit Test* (NCBT), noting that net community benefit arises when the sum of the benefits of a rezoning are greater than the sum of all costs from a community welfare perspective.

A NCBT has been undertaken by SGS in support of the Amended Proposal (Attachment 3) and is outlined later in this report.

### **Greater Sydney Region Plan**

The *Greater Sydney Region Plan* outlines how Greater Sydney will manage growth and change and guide infrastructure delivery. It sets the vision and strategy for Greater Sydney to be implemented at a local level through District Plans.

*The Region Plan* replaces *A Plan for Growing Sydney* as the leading region plan.

The overriding vision for Greater Sydney in the Region Plan is to rebalance Sydney into a metropolis of three unique but connected cities; an Eastern Harbour City, the Western Parkland City west of the M7 and the Central River City with Greater Parramatta at its heart.

Historically, Greater Sydney's jobs and transport have been focused to the east, requiring many people to make long journeys to and from work and other services. The 3 cities vision allows opportunities and resources to be shared more equitably while enhancing the local character we value in our communities.

By integrating land use, transport links and infrastructure across the three cities, more people will have access within 30 minutes to jobs, schools, hospitals and services.

The Site is strategically located in an identified economic corridor between Parramatta and Sydney Olympic Park in the Central City. The Amended Proposal is consistent with the Region Plan as it is in an identified urban renewal area and therefore has the potential to deliver the objectives of the Region Plan in terms of job creation and new dwellings.

Jacobs have undertaken a detailed analysis of this issue as detailed below (BOLD our emphasis):

*...Consideration of this 30-minute city concept has been made in the development of the proposed site, which currently has the potential for access to local and regional centres within this 30-minute catchment. Key centres that could be reached within 30 minutes include:*

- *Parramatta CBD, the key metropolitan city centre of the central city*
- *Auburn, a key local centre providing shopping, public transport and community services*
- *Granville, a local employment centre and key transport hub*

*Access to these centres is shown in in Tables 2.2 to 2.5. It shows that journeys from the site by public transport to Parramatta by public transport can be achieved in under 30 minutes. Access to local centres of Auburn and Granville for shopping, community services or work can be made by walking to Auburn within 20 minutes by walk and Granville within 22 minutes by walk and train. A breakdown of trips to local centres is shown in Table 2.6 and Table 2.7.*

***Analysis of public and active transport services around the site shows that people living at the site would have access to jobs within 30 minutes by active and public transport, fulfilling the vision of the 30-minute city.***



Future construction of Sydney Metro West would provide a high speed and high frequency link between Parramatta and Sydney Olympic Park. The Sydney Metro West is expected to be built by the second half of the 2020s. Sydney Metro West would provide opportunities to improve services on the existing T1 and T2 train lines by providing additional capacity and opportunity to provide more services that stop at Auburn Station, further increasing the accessibility of the site by public transport

**Table 2 2: Journey To Parramatta**

Mode	Time
Walk to Auburn Station	17 minutes
Wait for train	3 minutes
Train to Parramatta (T2)	9 minutes
Total journey time	29 minutes

Figure 40. Journey times to Parramatta CBD from the site by public transport (Source: Jacobs)

**Table 2 6: Journey to Auburn**

Mode	Time
Walk to Auburn Centre	17 minutes
Total	17 Minutes

**Table 2 7: Journey to Granville**

Mode	Time
Walk to Auburn Station	17 minutes
Wait for train	3 minutes
Tran to Granville	2 minutes
Total	22 Minutes

Figure 41. Journey times to other key centres from the site by public transport (Source: Jacobs)

In addition, SGS have undertaken a multi-criteria analysis of both the Amended Proposal and a full industrial land scenario against the Region Plan. A key emphasis in this work is the recognition that the site is under a review and manage status, which is important to the context of any consideration of rezoning of existing industrial land. Relevant extracts from this report are detailed below (**BOLD** our emphasis):

*In addition to a consideration of the costs and benefits of the two development scenarios, it is important to compare with Greater Sydney's strategic objectives The Manchester Road's designation under Objective 23 of the Greater Sydney Region Plan places its industrial zoning under a 'Review and Manage' status. This indicates the importance of the precinct and the need to carefully plan its future land use. **But unlike the 'Retain and manage' status of many of the LGA's to the east and north of Cumberland, the 'Review and Manage' status permits the consideration of alternative land use scenarios.***

*As discussed in previous chapters, **although the PAYCE proposal reduces the industrial land, it actually significantly increases the industrial floorspace.** However, to ensure that the 'Review and Manage' status is considered, this report uses the Greater Sydney Region Plan's 10 Directions and 38 Objectives to consider how the proposal addresses the full spectrum of strategic planning objectives.*

*...It is evident from the MCA that the PAYCE project case meets more of the GSC's Directions and Objectives than a full industrial build out scenario...*

*..The Project case meets more of the GSC's Directions and Objectives compared to the Industrial build out scenario. SGS' review of the scenarios against the Greater Sydney Region Plan's 10 Directions and 38 Objectives identified that the Project case was more aligned with these principles than the Industrial build out scenario, including when the scores were normalised ..*

A further response to the relevant Goals, Directions and Actions in the *Region Plan* follows:

Direction	Response
<b>A City supported by infrastructure</b>	The Amended Proposal aligns with this Direction by providing: <ul style="list-style-type: none"> <li>• new pedestrian and cycle connections</li> <li>• road upgrades</li> <li>• free shuttle bus to Auburn train station</li> </ul>
<b>A collaborative City</b>	The Amended Proposal aligns with this Direction. PAYCE is working collaboratively with Council, TfNSW and other government agencies
<b>A City for people</b>	The Amended Proposal strongly aligns with this Direction by providing: <ul style="list-style-type: none"> <li>• a community facility</li> <li>• open space/parks</li> <li>• active transport provision</li> </ul>
<b>Housing in the City</b>	The Amended Proposal strongly aligns with this Direction as follows: <ul style="list-style-type: none"> <li>• provides medium density housing</li> <li>• provides affordable rental housing</li> <li>• satisfies the criteria for 'urban renewal' given its location on a regional transport link, adjacent strategic centre with connections to walking and cycling routes</li> </ul>
<b>A City of great places</b>	The Amended Proposal strongly aligns with this Direction by: <ul style="list-style-type: none"> <li>• increasing the provision of open space</li> <li>• providing a community facility on site</li> <li>• providing by a mix of land uses and activities that provide opportunities for social connection in walkable, human scale, fine grain neighbourhoods.</li> </ul>
<b>A well-connected City</b>	The Amended Proposal strongly aligns with this Direction as follows: <ul style="list-style-type: none"> <li>• the Site is within walking distance of Auburn and Clyde train stations</li> <li>• the Site connects and contributes to cycleway and pedestrian pathways, including those adjacent to the Duck River open space corridor</li> <li>• contributes to the key outcome of population within 30-minute public transport access to the metropolitan cluster of Parramatta</li> </ul>
<b>Jobs and skills for the City</b>	The Amended Proposal strongly aligns with this Direction as follows: <ul style="list-style-type: none"> <li>• it is an effective use of industrial and urban services land to provide employment opportunities for emerging and innovative industries and creation of new industrial floorspace.</li> <li>• It provides a new centre for people to live and work</li> <li>• It supports the continued economic development and diversity of Greater Parramatta</li> </ul>
<b>A City in its landscape</b>	The Amended Proposal strongly aligns with this Direction: <ul style="list-style-type: none"> <li>• The Amended Proposal provides for revitalisation of the Duck River and the provision of urban vegetation</li> <li>• The Proposal provides a 2.2ha of public open space and links to other open space networks along Duck River</li> </ul>
<b>An efficient City</b>	The Amended Proposal aligns with this Direction as follows:

Direction	Response
	<ul style="list-style-type: none"> <li>The site is in close proximity to 2 train stations and this alleviates dependence on private vehicle travel</li> <li>ESD to reduce waste and energy usage will be incorporated at detailed design at later stages</li> </ul>
<b>A resilient City</b>	The Amended Proposal aligns with this Direction as redevelopment of the site can be designed to adapt to the impacts of urban and natural hazards.

Table 5: Alignment with the Greater Sydney Region Plan

### **Central City District Plan**

The *Central City District Plan* (District Plan) reinforces the key planning directions and objectives outlined in the Greater Sydney Region Plan (Region Plan). The District Plan provides broad strategic directions to support the Central City. The District Plan consists of key planning priorities and actions for achieving a liveable, productive and sustainable future for the Central City.

The District Plan places a significant focus on productivity, including the recognition of the importance of Greater Parramatta and the Olympic Peninsula Area (GPOP) and the protection of industrial and urban services land.

The Site has been identified as industrial and urban services land within the District Plan. *Urban services* include a wide range of activities such as motor vehicle services, printing, waste management, courier services and concrete batching plants.

The District Plan places emphasis on the management of industrial and urban services land and classifies this land as either review or retain.

***Importantly, the site is located within a 'Review and Manage' region, allowing for flexibility in the use of undeveloped industrial land. The review is required to consider the current level of industrial and urban services land supply, the changing nature of industries and the transformation in the sector due to the impact of changing demand for land.***

Planning Priority C11 - *Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land*, references Council's Draft EILS/LUPF as follows:

*...Industrial and urban services land in Cumberland Local Government Area is required for emerging innovative industries in digital innovation, media, arts, creative industries, food and beverage manufacturing, allied health, research and development and advanced technology manufacturing. Given the proximity to Greater Parramatta and access to transport and freight routes, these sites are ideally positioned to provide innovation and important urban services that support the growth of the Central City District.*

*Cumberland Council's draft Employment and Innovation Lands Strategy and Land Use Planning Framework recognise the opportunity to transition its economy into higher order and productive industries and the knowledge-intensive economy. It seeks to develop an innovation ecosystem and grow a number of key sectors: digital technologies/ media, advanced manufacturing, food and beverage, manufacturing, creative industries, fashion, allied health, advanced knowledge services and freight and logistics...*

Thus, Planning Priority C11 recognises the opportunity for traditional industrial land to transition to higher order productive industries. The feasibility analysis undertaken by SGS in support of the Amended Proposal demonstrates the suitability of the site to transition to a mix of uses resulting significant public benefits.

Critically, the District Plan also recognises that conversion of industrial land to other uses may be appropriate as detailed below (**BOLD** our emphasis):

*...In limited cases, conversion to other uses may be appropriate. In some locations, such as GPOP, specifically Camellia, Rydalmere and Silverwater, the safeguarding of industrial activities will be a starting objective. The Greater Sydney Commission will collaborate with other State agencies and councils and seek input from stakeholders as part of the review. **This approach applies to the Cumberland, The Hills and City of Parramatta local government areas and the established areas of Blacktown Local Government Area...***

The Amended Proposal comprehensively demonstrates the case for transition of part of the site from the existing industrial zoning to allow a broader range of uses. The Amended Proposal is supported by an evidence-based analysis to deliver:

- significantly increased employment numbers/rates
- higher order employment opportunities supported by residential uses
- significantly higher worker amenity to attract new diverse businesses
- a catalyst project for the transition of employment lands that directly adjoin residential uses
- an innovative solution for a heavily constrained vacant, redundant industrial site

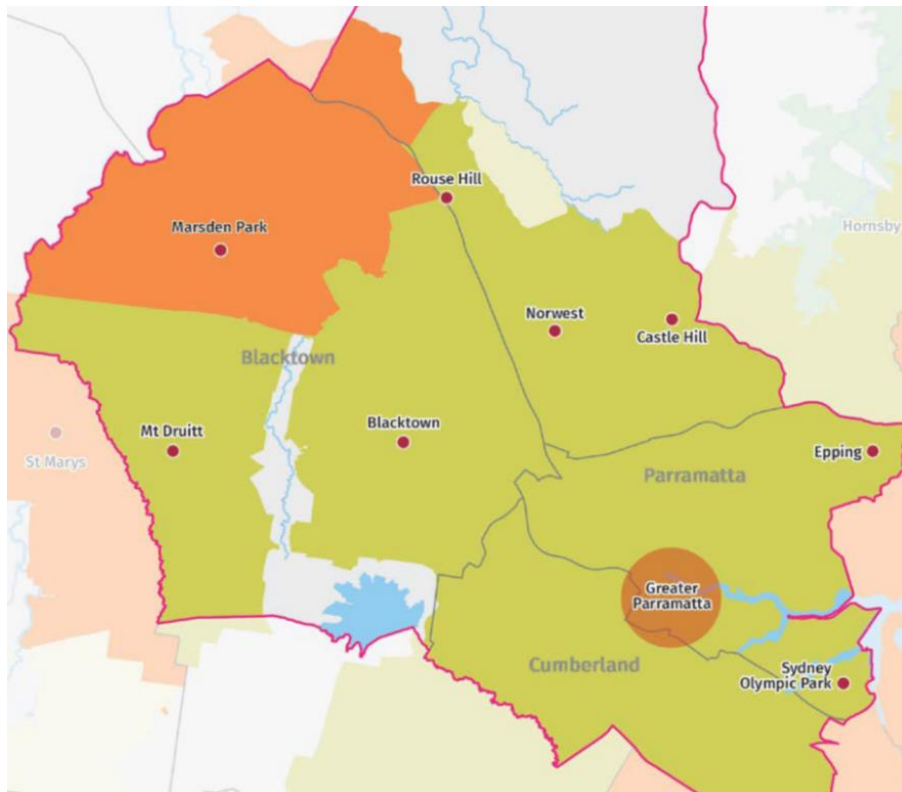


Figure 42. Central City District industrial and urban services land approaches - Cumberland identified in green as review and manage (Source: GSC)



Consideration of the Amended Proposal against just the Productivity planning priorities and actions of the District Plan alone is also misleading. A holistic review of the Amended Proposal against all of the planning priorities contained in the District Plan should be undertaken when considering the future of the Site in order to determine the **Net Community Benefit (NCB)** resulting from the Proposal determine the suitability of the sites transition. This analysis has been undertaken by SGS.

The NCB suggests that the Amended Proposal is likely to deliver an increase in wider benefits and meets more Directions and Objectives compared to both the existing development and the alternative case of a full industrial build out.

Below is a summary of the Amended Proposal's ability to contribute to the objectives of the District Plan.


Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
Infrastructure and collaboration	<b>Planning Priority C1</b>  Planning for a city supported by infrastructure	Objective 1: Infrastructure supports the three cities  Objective 2: Infrastructure aligns with forecast growth  Objective 3: Infrastructure adapts to future needs  Objective 4: Infrastructure use is optimised	<b>Strong</b>  The Amended Proposal will provide the following contributions toward infrastructure: <ul style="list-style-type: none"> <li>• Special infrastructure Contributions</li> <li>• section 94 Contributions</li> <li>• road upgrades</li> <li>• environmental upgrades</li> <li>• public open space</li> </ul>
	<b>Planning Priority C2</b>  Working through collaboration	Objective 5:  Benefits of growth realised by collaboration of governments, community and business.	<b>Moderate</b>  It is noted that the Site is not a recognised "Collaboration Area".  However, Cumberland's Employment and Innovation Lands Strategy (EILS) is given as an example of an initiative led by Council which involves collaboration with stakeholders such as tertiary institutions, State agencies and the private sector to develop a land use planning framework to set the direction for employment and innovation land within the local government area.  PAYCE has made two detailed submissions to inform the Draft EILS (Attachments 13 &14)

Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
			PAYCE is continuing to work collaboratively with Council, TfNSW and other government agencies
	<b>Planning Priority C3</b>  Providing services and social infrastructure to meet people's changing needs	<b>Objective 6:</b>  Services and infrastructure meet communities' changing needs.	<b>Strong</b>  The Amended Proposal provides the opportunity for the provision of social infrastructure including affordable housing, child care centre, public open space and community facilities.
	<b>Planning Priority C4</b>  Fostering healthy, creative, culturally rich and socially connected communities	<b>Objective 7:</b> Communities are healthy, resilient and socially connected.  <b>Objective 8:</b> Greater Sydney's communities are culturally rich with diverse neighbourhoods.  <b>Objective 9:</b> Greater Sydney celebrates the arts and supports creative industries and innovation.	<b>Moderate</b>  The Amended Proposal incorporates: <ul style="list-style-type: none"> <li>• housing diversity</li> <li>• affordable housing</li> <li>• public open space</li> <li>• pedestrian and cycle connections</li> </ul> <b>Strong</b> <ul style="list-style-type: none"> <li>• the B7 Business Park zone provides opportunities for creative industries</li> </ul>
	<b>Planning Priority C5</b>  Providing housing supply, choice and affordability, with access to jobs, services and public transport	<b>Objective 10:</b>  Greater housing supply.  <b>Objective 11:</b>  Housing is more diverse and affordable.	<b>Strong/Moderate</b>  The Plan requires Cumberland Council to prepare a Housing strategy for the newly formed Cumberland LGA.  The Plan also requires an Affordable Rental Housing Target Scheme. The Plan states that housing targets are generally in the range of 5-10% of new residential floor space.  The Amended Proposal will increase general housing supply including a 5% affordable housing component.  The Site satisfies the locational criteria for an urban renewal investigation area, in that parts of

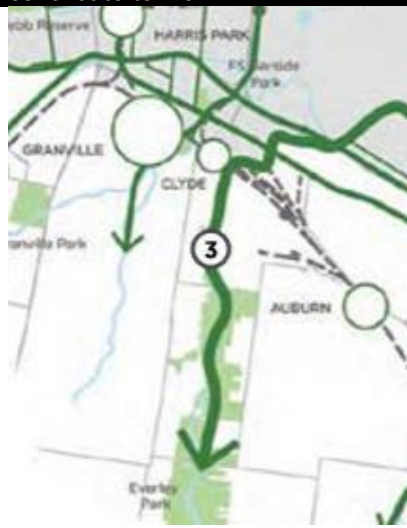
Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
			the site are “within walking distance (10 minutes) of a centre with rail, light rail or regional transport”
	<b>Planning Priority C6</b>  Creating and renewing great places and local centres, and respecting the District’s heritage	Objective 12:  Great places that bring people together.  Objective 13:  Environmental heritage is identified, conserved and enhanced.	<b>Strong</b>  The Amended Proposal provides a holistic approach to the renewal of the site, incorporating employment areas, housing, open space, infrastructure upgrades and environmental rehabilitation.
Productivity	<b>Planning Priority C7</b>  Growing a stronger and more competitive Greater Parramatta	Objective 19: Greater Parramatta is stronger and better connected.  Objective 21:  Internationally competitive health, education, research and innovation precincts.	<b>Moderate</b>  The Amended Proposal is representative of the District Plans’ goal of transitioning from industrial to advanced manufacturing and innovation industries to boost productivity.  The redevelopment of the site will provide housing opportunities for a residential population within 30-minutes of Parramatta.
	<b>Planning Priority C8</b>  Delivering a more connected and competitive GPOP Economic Corridor	Objective 15:  The Eastern, GPOP and Western Economic Corridors are better connected and more competitive.	<b>Moderate</b>  The Amended Proposal is immediately adjacent the southern boundary of the GPOP. It will improve connections to and the competitiveness of the corridor.
	<b>Planning Priority C9</b>  Delivering integrated land use and transport planning and a 30-minute city	Objective 14:  A Metropolis Of Three Cities – integrated land use and transport creates walkable and 30-minute cities.  Objective 16:  Freight and logistics network are competitive and efficient.	<b>Strong</b>  The Amended Proposal: <ul style="list-style-type: none"> <li>• improves access to local jobs</li> <li>• provides walking and cycling connections</li> <li>• is consistent with the role identified for Cumberland Council’s suburbs to ‘continue to provide a diversity of housing and jobs for the community.’</li> </ul> <b>Moderate.</b> The protection of transport corridors is recognised by

Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
			incorporating a substantial buffer to the railway land.
	<b>Planning Priority C10</b>  Growing investment, business opportunities and jobs in strategic centres	Objective 22:  Investment and business activity in centres	<b>Strong</b>  The Amended Proposal aligns with the actions identified including: <ul style="list-style-type: none"> <li>co-locating of a wide mix of activities, including residential</li> <li>improving walkability</li> <li>improving the cycling network</li> </ul> The Amended Proposal is consistent with the principle of creating new business parks.  The proposed B7 area will creating jobs and provide services to the local community.  It will be developed as a vibrant urban place with high amenity.  Of note is the following sentence from the District Plan which raises the notion of ancillary residential development:  <i>"Councils' retail and employment strategies should provide guidance on the transition of business parks into mixed employment precincts including, where appropriate, ancillary residential developments to support the business park."</i>
	<b>Planning Priority C11</b>  Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land	Objective 23:  Industrial and urban services land is <b>planned, retained and managed</b> .	<b>Moderate</b>  It is noted that the Central City has the highest proportion of Greater Sydney's total stock of industrial and urban services land, approximately 34 per cent.  This demonstrates that there is no shortage of industrial land.  The site is identified as <b>review and manage</b> (not the more onerous retain and manage).  The Amended Proposal is consistent with the action to



Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
			<p>transition to higher order uses (such as business parks) and prepare appropriate controls to maximise business and employment outcomes.</p> <p>The nearby <b>Clyde intermodal</b> is identified on <i>Figure 19: industrial and urban services land and freight assets</i> (extract below)</p>  <p>The Amended Proposal will not impact on the operations of this facility which is located on the opposite side of the railway line.</p> <p>The Amended Proposal incorporates an appropriate buffer area between the residential uses and the railway uses.</p>
	<b>Planning Priority C12</b>  Supporting growth of targeted industry sectors	Objective 24:  Economics sectors targeted for success (Tourism, Agriculture, Mineral resources)	N/A
Sustainability	<b>Planning Priority C13</b> Protecting and improving the health and enjoyment of the District's waterways	Objective 25:  The coast and waterways are protected and healthier.	<b>Strong</b> The Amended Proposal includes Rejuvenation of Duck River  Page 100: Improving the health of the Duck River is an important priority for the District and essential to achieve the long-term vision of

Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
			making downstream areas of Parramatta River swimmable.
	<b>Planning Priority C14</b>  Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element	Objective 26: A cool and green parkland city in the South Creek corridor.	N/A
	<b>Planning Priority C15</b>  Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes	Objective 27:  Biodiversity is protected, urban bushland and remnant vegetation is enhanced.  Objective 28:  Scenic and cultural landscapes and protected.	<b>Moderate</b>  No bushland on the on the site. Biodiversity issues in nearby Duck River corridor  Duck River is identified as a Scenic and Cultural Landscape. The Amended Proposal will contribute to the upgrade of the Duck River corridor.
	<b>Planning Priority C16</b>  Increasing urban tree canopy cover and delivering Green Grid connections	Objective 30:  Urban tree canopy cover is increased.  Objective 32:  The Green Grid links parks, open spaces, bushland, and walking and cycling paths.	<b>Strong</b>  There are currently very few trees are on the site. The Amended Proposal incorporates substantial tree planting.  The Duck River Open Space Corridor is identified as a priority corridor.  The Amended Proposal includes the upgrade a highly degraded section of Duck River as well contributing to walking and cycling paths.  The Amended Proposal will contribute to pedestrian/cycle paths along Duck River which is identified on the Parramatta Walking Strategy Map (see excerpt below)

Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
			
	<b>Planning Priority C17</b>  Delivering high quality open space	Objective 31 [sic]:  Public Open Space is accessible, protected and enhanced	<b>Strong</b>  New public open space areas are part of the Amended Proposal.
	<b>Planning Priority C18</b>  Better managing rural areas	Objective 29 [sic]:  Environmental, social and economic values in rural areas are protected and enhanced.	N/A (not a rural area)
	<b>Planning Priority C19</b>  Reducing carbon emissions and managing energy, water and waste efficiently	Objective 33:  A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change.  Objective 34:  Energy and water flows are captured, used and re-used.  Objective 35:  More waste is re-used and recycled to support the development of a circular economy.	<b>Strong</b>  Future development envisaged in the Amended Proposal is capable of satisfying ESD objectives.
	<b>Planning Priority C20</b>	Objective 36:  People and places adapt to climate	<b>Strong</b>  Future development envisaged in the Amended Proposal can

Key Direction	Planning Priority	Objectives	Ability of Amended Proposal to contribute to Plan
	Adapting to the impacts of urban and natural hazards and climate change	change and future shocks and stresses.  Objective 37:  Exposure to natural and urban hazards is reduced.  Objective 36 [sic]: Heatwaves and extreme heat are managed.	incorporate appropriate responses to these issues.
Implementation	<b>Planning Priority C21</b>  Preparing local strategic planning statements informed by local strategic planning	Objective 39:  A collaborative approach to city planning	<b>Strong</b>  The Amended Proposal includes an assessment of economic, social and environmental matters in the area.  PAYCE is liaising with Council, State Rail and other agencies to address their concerns.  This Priority requires Council to commence a review of existing local environmental plans.
	<b>Planning Priority C22</b>  Monitoring and reporting on the delivery of the Plan	Objective 40: Plans are refined by monitoring and reporting.	N/A

Table 6: Alignment with the Central City District Plan

When assessed against the Planning Priorities of the Central City District Plan, the Amended Proposal aligns with all of the relevant planning priorities, resulting in a Net Community Benefit. The Amended Proposal therefore has considerable merit in contributing to overall attainment of the vision for Greater Sydney.

### ***Parramatta Light Rail***

Parramatta Light Rail is one of the State Government's major public transport projects in Western Sydney. Parramatta Light Rail Stage 1 connects Westmead to Carlingford via Parramatta CBD and Camellia. The alignment links Parramatta CBD and Parramatta's Transport Interchange to the Westmead Health precinct, Parramatta North Urban Transformation Program, the new Western Sydney Stadium, the new Powerhouse Museum and Riverside Theatres Cultural Hub, the private and social housing redevelopment at Telopea, Rosehill Gardens Racecourse and three Western Sydney University campuses.



The preferred route for Stage 2 is approximately nine kilometres and connects with Stage 2 of the project north of the Parramatta River through the suburbs of Ermington, Melrose Park, Wentworth Point and on to Sydney Olympic Park. This route supports new communities and the public places planned between Camellia and Ermington and the future development planned for Melrose Park.

The Parramatta Light Rail is located north of the Parramatta River and will provide a modern transport service between Parramatta and Sydney Olympic Park. While not directly impacting on the redevelopment of the Site it will provide indirect benefits from this initiative by improved regional road and public transport access and amenity.

***Is the Planning Proposal Consistent with Council's Local Strategy or Other Local Strategic Plan?***

***Cumberland Council Community Strategic Plan 2017-2027***

This document sets out the community's vision for the future; the strategies in place to achieve it, and how progress towards or away from the vision will be measured. This plan is based on extensive community engagement with over 2,500 residents, government agencies, community groups and businesses.

It helps set the broad strategic direction for Cumberland Council's operations which are aligned directly to the community vision through the six strategic goals and supporting activities contained in the plan. The strategic plan has the following six strategic goals:

1. A great place to live
2. A safe accessible community
3. A clean and green community
4. A strong local economy
5. A resilient built environment
6. Transparent and accountable leadership

The Amended Proposal is consistent with the strategic goals as it will result in the following:

- a distinctive coherent community that can offer diverse new housing choice opportunities;
- improved connectivity and accessibility with new green links connecting through the Site and adjacent to Duck River;
- improve environmental sustainability, public access and use of the Duck River corridor;
- improve walkability and health;
- positively contribute to Cumberland's economy by creating a range of full-time jobs in the employment zones and construction jobs during implementation; and
- positively contribute to a liveable Auburn.

For these reasons, the Amended Proposal is consistent with and supportive of the key strategic directions contained in Cumberland Council Community Strategic Plan 2017-2017.

### ***Auburn Employment Lands Strategy 2015***

The *Auburn Employment Lands Strategy* (ELS) report was prepared by AEC for the former Auburn City Council and adopted by Council in December 2015. The Strategy was commissioned to enable the Council to plan for future employment growth and change in the LGA, particularly on land covered by industrial or business zones.

Importantly, the endorsed ELS has not been repealed and therefore is the be primary strategy when considering changes to employment lands. It continues to remain relevant to the Site.

The ELS relates to lands zoned for employment within the Auburn LGA (those lands within the industrial and business zones in the LEP) and focuses on land for retail, commercial and industrial activities. To align with other longer-term State and local strategies and policies, the strategy has a 17-year horizon to 2031.

The ELS draws together economic and property market research and employment growth projections to ascertain the likely nature and quantum of demand for employment lands (including centres) within the former Auburn LGA.

The study area for the report included as series of employment precincts within the LGA, categorised as either industrial or business zoned areas. For each precinct, the report considered factors including whether existing planning controls were appropriate, sustainable, and likely to accommodate future business, industry and community needs.

The Site is part of Precinct 9, which is primarily comprised of the Clyde Marshalling Yards, and includes the warehouses occupied by RailCorp in the south-east portion, the BlueScope Steel distribution facility, and vacant parcels of land. It is important to note that the Precinct 9 and 12 are separated by the railway lines and that analysis of Precinct 9 encompasses the Clyde site, but also includes a substantial area which is not part of the site.

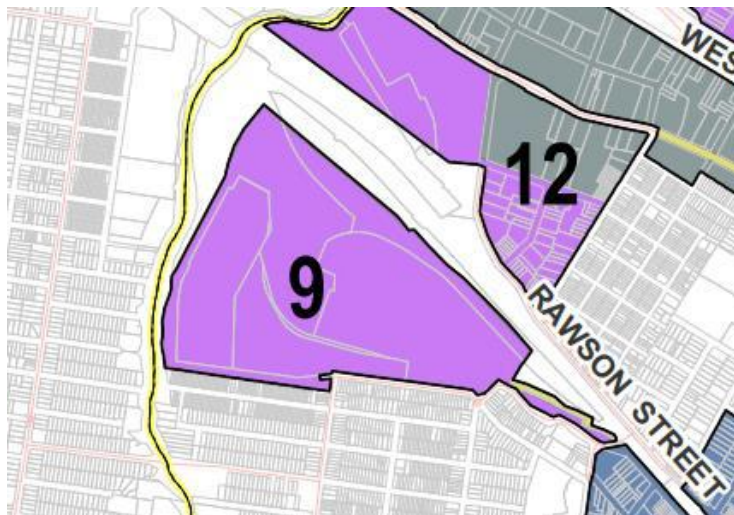


Figure 43. Precinct 9 and 12 (Source: AEC 2015)

The Site is located within Precinct 9 Clyburn. The ELS identifies the competitive features associated with the Site's role providing land for employment. Average lot sizes in the Clyburn are the largest across the former Auburn LGA with 45% of lands sized greater than 1 hectare.

The ELS notes the benefits of current industrial uses on the Site including strong spatial function and proximity to transport networks.

The ELS recognises the Site's poor location for industrial uses due to its' isolation from arterial road access. In addition, the Site's proximity to residential areas and the environmentally sensitive Duck River, limit the suitability of the Site for a range of economic sectors. The ELS acknowledges that the Site does not meet the requirements of contemporary industrial users.

It should be noted that the Manchester Road Site is only part of the precinct which is referred to in these conclusions. The marshalling yards role will continue the railway lands. The employment component of the Site can play a role in providing service-based businesses as suggested by the Strategy.

The Auburn ELS identifies an emerging surplus of industrial land which is a result of the changing nature of employment uses in the former Auburn LGA and the ability to achieve greater land efficiency in the industrial areas given their traditional uses and layouts.

The ELS identifies a range of recommendations for industrial zoned land in the former Auburn LGA including protect and retain large clusters of functional employment lands and support businesses located in fragmented and orphaned industrial Sites. Specifically, for the Clyburn precinct, the ELS recommendations are based on 2 scenarios.

- If the access constraints were resolved, the ELS recommends that it could operate in conjunction with the Auburn West precinct (to the north of the Site) as a highly productive employment area accommodating future employment growth over the longer term.
- Should access issues not be resolved the ELS recommends that the precinct be retained as IN1 General Industrial with consideration given to a B5 Business Development zone, in the longer term to retain employment uses if current uses cease, and potentially consider complementary residential uses.

Consequently, the potential for residential development on the Site was included in the adopted ELS, as complementing the provision of service-based businesses (such as respite day care, commercial premises, community facilities, childcare centres and health service facilities) which support the vitality of the area.

The precinct's difficult location, with primary access predominantly through residential areas, is a major disadvantage. This is the major reason for the lack of investment in industrial uses on the Site as acknowledged at page 125 of the Auburn ELS as follows:

*...While Precinct 9 (Clyburn) has the highest average allotment size in the Study Area, owing to its location adjoining residential areas and restricted access, market appeal of vacant blocks, despite their scarcity in the Study Area, is limited...*

The Auburn ELS identifies the following emerging trends within the Auburn LGA:

- the structure of the LGA is forecast to shift away from traditional industrial style activities such as manufacturing and warehousing towards population and household-led service employment (health care and social assistance services, and education and training);
- this will be augmented by increased knowledge-driven employment;

- manufacturing and the demand for industrial floorspace and Sites is forecast to decline within Auburn;
- the LGA has sufficient capacity to absorb market demand for employment growth; and
- the viability and sustainability of land for continued industrial use is underpinned by its accessibility, ability to operate in a conflict free environment and the ability to cluster with other industries. Where these elements cannot be achieved, alternative uses should be considered.

The overall recommendations for the Clyburn precinct are presented as 2 scenarios depending on whether access issues are resolved. Over the much longer term, the precinct could facilitate a mix of business uses to support the Parramatta Road B6 Enterprise Corridor, subject to the operational requirements of the Clyde Marshalling Yards and assuming that current access issues are resolved. It is suggested that improvements would need to be made to the precinct's accessibility from Parramatta Road and Rawson Street in the north, or alternatively from Manchester Road in the south before an intensification of employment uses could be considered.

The ELS's recommendations for the Clyburn Precinct in relation to the Amended Proposal are addressed in the table below:

Adopted ELS recommendations for the Clyburn Precinct	The Planning Proposal
<p><b>Scenario 1: Access Improved and Strengthen</b></p> <p><i>In the much longer term, closer to the end of the 20 year planning horizon envisaged in this Strategy, subject to improved access either from Parramatta Road and Rawson Street in the north or from Manchester Road in the south, an intensification of employment uses could be considered. Potential land uses include warehouse or distribution centres, hardware and building supplies, landscaping material supplies or other uses that support the viability of bulky goods premises along the Parramatta Road B6 Enterprise Corridor, for instance by providing back-of-house operations for a use along Parramatta Road.</i></p> <p><i>In the much longer term and with these access issues resolved, Clyburn could operate in conjunction with Auburn West as a highly productive employment area to accommodate employment growth and its evolving nature. It is however stressed that this is a very long-term scenario as the Clyburn precinct continues to be valuable for industrial purposes with the rail operations likely to remain as a permanent feature of the precinct.</i></p>	<p>This scenario is unlikely to eventuate as investigations have shown that a bridge over the railway line connecting the two sides of the precinct is not feasible. In addition, due to the large width of the railway line in the precinct, it is not the ideal location for a railway crossing.</p> <p>This is supported by SGS analysis which makes the following comment in this regard:</p> <p><i>...The recently released draft report on Cumberland LGA's Employment Lands identifies the need for a bridge to the north over the rail line to link the precinct to the Auburn industrial area off Parramatta Road and thereby activate it and stimulate accelerated industrial and employment activity. Such a bridge (in the order of \$50-80 million ) is unlikely to be provided by the State Government for such a small precinct and, if required to be funded by industrial development on the site, would make pure industrial development at this location even less feasible...</i></p>



<p><b>Scenario 2: Access Issues Not Resolved</b></p> <p><i>Should access issues be unable to be resolved and access remains poor and traversing residential areas, it is likely that lands will remain in their present form, accommodating large warehouses and sheds. In this scenario, new industrial uses are unlikely to be attracted to the precinct.</i></p> <p><i>Owing to the precinct's close proximity to established residential areas, the precinct is likely to appeal more to business users who respond to population growth and play a local service role, rather than business/industrial users who respond to economic activity in the broader region. Uses could include respite day care centres, commercial premises, community facilities, childcare centres and health services facilities.</i></p> <p><i>In this scenario, residential uses could be considered to complement the provision of and contribute to the viability/vitality of business floorspace, particularly in the portion of the precinct closest to existing residential uses, subject to resolution of interface and amenity issues with the marshalling yards.</i></p>	<p>The Proposal is consistent with this recommendation. The proposed additional population generated by the Proposal will drive local business growth which will be accommodated in the employment areas.</p> <p>The proposed additional uses of office premises (limited to max 10% of total GFA), respite day care centres and health services and car park are consistent with this recommendation.</p> <p>The residential component of the Proposal will result in population driven demand for local business, services and retail facilities, thus providing viability for businesses leading to a vibrant and healthy community.</p> <p>Amenity issues between the residential uses and the railway uses (notably the marshalling yards) will be addressed by carefully designed residential buildings, incorporating noise mitigation measures.</p>
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Table 7: Consideration of the recommendations of the ELS in relation to the Proposal

The ELS recommends retaining the IN1 zoning of the precinct, given its strategic importance and support role as marshalling yards, and that over the longer term, a B5 Business Development zoning be considered, subject to the existing accessibility issues being resolved.

Given that the accessibility issues to the north cannot be easily resolved, the first scenario is unlikely to eventuate. Therefore, the recommendations contained in the second scenario are relevant. In this regard, the Amended Proposal is generally consistent with the ELS recommendation. That is, providing for a broader range of employment uses (both large and medium scale industrial premises as well as smaller industrial units), with complementary residential development and open space areas.

### **Auburn Residential Development Strategy 2015**

The purpose of the Auburn Residential Development Strategy 2015 (the Residential Strategy) is to guide planning for future housing needs in Auburn City (the former Auburn local government area) over the next 20 years.

The Residential Strategy considers appropriate locations throughout Auburn City (former Auburn local government area) to accommodate increased residential growth and also proposes amendments to planning controls that may facilitate growth to cater for ongoing market demand.

The Residential Strategy examines the prevailing wider planning context of Auburn City (former Auburn local government area), analyses the current supply and demand for housing in the area, and investigates from this base, the potential to meet future growth in Auburn over the next 20 years. It also provides an important source of analysis and information in the assessment of planning proposals and development applications for new housing in Auburn.

We understand that the Residential Strategy was developed through analysis of various factors that will influence residential development, including:

- the broader planning context of Auburn City (former Auburn local government area), including analysis of the existing strategic and statutory framework
- existing development constraints, including flood prone land, strata titled land, heritage items and conservation areas, open space, land zoned for employment use, schools and places of public worship
- projected population and dwellings growth
- current supply and demand for housing
- current and projected demographic characteristics
- planned and proposed development within and outside Auburn City (former Auburn local government area), including major developments such as Sydney Olympic Park, Wentworth Point and Carter Street Urban Activation Precincts
- recent history of dwelling production, approvals and uptake in Auburn City

The Residential Strategy projects that 23,000 new dwellings will be required to accommodate over 50,000 new residents to 2031. This range is used to determine the potential surplus number of dwellings that will need to be accommodated once known approved and proposed development proposals have been taken into account.

Notwithstanding, given the significant changes to LGA boundaries, these findings are no longer relevant. This is reflected in Planning Priority C21 - *Preparing local strategic planning statements informed by local strategic planning*, of the District Plan which requires Cumberland Council to prepare a new housing strategy.

Regardless, reliance on capacity in existing zones to deliver housing supply (as is the case in the current Residential Strategy) is no guarantee that these sites will be developed. Small lot sizes and multiple owners are often barriers to some sites reaching their full potential.

In contrast, the Manchester Road site is a large parcel of land in single ownership thereby providing certainty for the staged delivery of future housing supply.

#### ***Cumberland Draft Employment and Innovation Lands Strategy and Land Use Planning Framework***

The Cumberland Draft Employment and Innovation Lands Strategy and Land Use Planning Framework (Draft EILS) 2017 has been undertaken by AEC Group/ Mecone on behalf of Auburn City Council. The EILS aims to promote firmer and innovative employment, business and economic outcomes for Cumberland through development of a Land Use Planning Framework.

PAYCE have made 2 submissions on the Draft EILS dated 3 November 2017 (Attachment 13) and 20 April 2018 (Attachment 14). The Draft EILS seeks to develop an innovation ecosystem, focusing on key industry sectors, and to grow a number of sectors that will leverage off the diversity and skills of migrants in the community. Another key objective of the Strategy has been to ensure that employment lands are sustainable and able to adapt to the changing needs of industry and business over time.

### Defining the Precinct

The employment land in the Amended Proposal is perfectly situated to provide opportunities for a range of new employment opportunities including the above industries. Under the Draft EILS, the Site is located within a larger Clyburn precinct which incorporates industrial land on the northern side of the railway land. This is a significant difference from the endorsed Auburn ELS which defines Clyburn as industrial lands south of the railway land. The area north of Clyburn is classified as a separate precinct known as “Auburn West”.

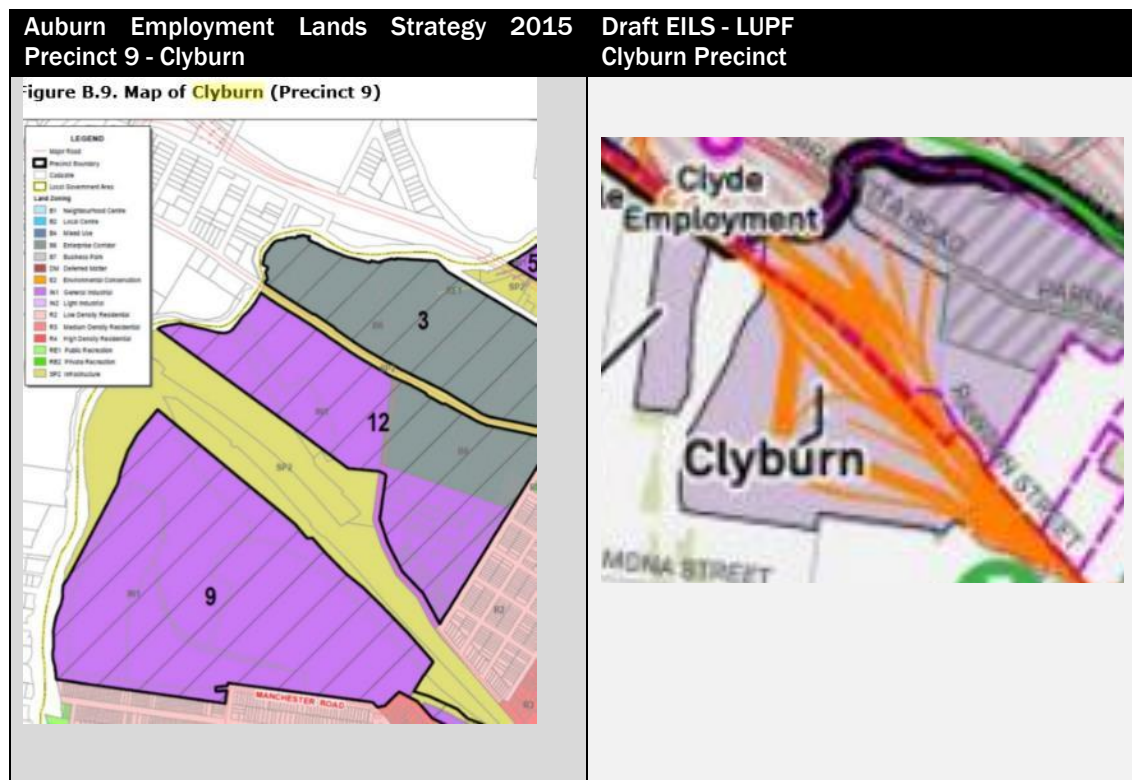


Figure 44. Comparison of the Clyburn Precinct defined in the Draft EILS and the endorsed Auburn ELS 2015.

The combining of Precinct 9 and part of Precinct 12 is **not** supported as the Auburn West area is isolated from Clyburn by the railway line. The endorsed Auburn ELS Clyburn boundary is more logical as the areas north and south of the railway line have no physical connection being completely severed by the railway line.

The Precinct north of the railway line in the adopted Auburn ELS is the Auburn West Precinct and contains manufacturing and logistic users including Cement Australia and Boral Cement. The Clyde Intermodal Terminal, is also located north of the railway line. The importance of these uses is acknowledged; however, the validity of these uses being treated as a *naturally occurring cluster* is questioned.

There is no physical connection between the area north and south of the railway land as the railway line acts as a physical barrier between the two areas, with no existing or proposed bridge connecting these areas and the uses/characteristics of the 2 precincts are very different.

A more detailed review/analysis of the Clyburn Precinct is required. The Precinct is not a homogeneous area as depicted in the Draft EILS.

While the protection of the primary uses mentioned in the Draft EILS (i.e. the Clyde Transfer Terminal and Clyde Marshalling Yards), the inclusion of the Manchester Road Site in the Category *services for service sector* is not appropriate.

The Manchester Road site is clearly distinct and separate from the primary uses identified (i.e. the Clyde Transfer Terminal and Clyde Marshalling Yards and other industrial uses) for the following reasons:

- a large proportion of the site is vacant
- the site was disposed of as surplus government land
- the site is geographically isolated from the uses to the north of the railway line
- poor vehicular access
- direct residential interface

The PAYCE submission on the Draft EILS recommends that the Manchester Road site be recognised as distinct from the rest of the Clyburn Precinct and that Council support the transition of the site and it be identified as a future urban investigation area.

### ***Future Employment uses***

We also note that the Draft EILS finds that the Clyburn Precinct is characterised by high vacancy levels and a lack of development activity. Given this general low demand, alternative and contemporary employment uses should be investigated for part of the Manchester Road Site and this should be reflected in new a planning control regime for the Site.

The Draft EILS identifies the following key industry sectors for development and growth in Cumberland: These key sectors are:

- |                               |                                   |
|-------------------------------|-----------------------------------|
| • Digital technologies/media  | • Advanced manufacturing          |
| • Advanced knowledge services | • Food and beverage manufacturing |
| • Creative industries         | • Freight and logistics           |

The proposed employment land at Manchester Road site is suitable for the delivery of five key industry sectors, that is; digital technologies/media, creative industries, fashion, allied health and advanced knowledge services.



The Draft EILS contains vision themes that are intended to reinforce existing successful industries in the immediate term while outlining aspirational vision for the longer term. The theme for the Clydeburn Precinct is 'Services for the Services Sector' this is described as follows (page 81):

*...Services for the service sector includes those activities crucial to a city's metabolism including manufacturing and maintenance, rail maintenance, waste management and recycling and wholesale and logistics. Although these uses may not employ a high intensity of workers, they are nevertheless important for a city to function...*

A critical focus of activities in the precinct is the Clyde Transfer Terminal which is a designated intermodal terminal. It is critical to note, however, that this facility is located on the northern side of the railway line and has no direct relationship to the Site.

The Clyde Intermodal Terminal is a relatively small-scale facility in metropolitan terms. It is located on the northern side of the main rail corridor, some 350-500m to the north of The Clyde Intermodal Terminal is a relatively small-scale facility in metropolitan terms. It is located on the northern side of the main rail corridor, some 350-500m to the north of the Manchester Road Site and benefits from direct access to Parramatta Road. The terminal contains a waste transfer facility operated by Veolia and an adjacent multi-user freight yard in which Boral operates a facility for the delivery of cement powder and fly ash. As there is no crossing over the rail corridor, the northern part of the Clydeburn Precinct is physically separate from the southern side.

The Clyde Marshalling Yards are located on the southern side of the railway line and comprise of several facilities servicing the passenger rail network including; Auburn Rail and Maintenance Centre; Auburn Logistics Services Warehouse Centre; Auburn Network Base; Auburn Stabling Yard and UGL Unipart Rail Maintenance Centre. Their importance in the provision of state infrastructure is acknowledged. However, it is important to note that vehicular access to these operations is limited to Manchester Road and a private road.

The impacts of the Sydney Trains building known as The Hub, completed in 2017, warrants investigation. The Hub is essentially a large office complex which accommodates approximately 1,500 rail workers and is the headquarters for all Sydney Train operations. Its operation opens up possibilities for either expansion or complementary uses. There are opportunities for synergies and relationships with this facility.

The construction of the Hub further reinforces the suitability of the area for alternative, technology intensive employment uses. The location of the proposed new 4ha employment area within the Proposal adjoining the Hub allows for opportunities for complementary uses (for example, car parking or supporting service businesses). This may include potential future expansion of rail-related uses within the new precinct.

The fact that there has been no demand for the Manchester Road site for rail or other industrial uses, suggests that a no-change approach to the precinct will not result in any increase in the employment uses on this land. There are several geographical and physical factors which barriers to industrial uses, including:

- lack of accessibility
- separation from the rail corridor by the rail marshalling yard; and
- residential interface along Manchester Road leading to potential operation conflict issue.

Expansion of rail uses or heavy industrial uses in the south of the Clyburn Precinct is limited given that the only access is through a residential area.

The single ownership of the Site provides a unique opportunity for a master planned response which respects both the railway uses to the north and the residential areas to the south. This proposal will comprise of light industrial/business uses, a local retail centre serving both worker and residential populations, recreational open space and with residential uses toward the southern edge which adjoins the existing residential uses along Manchester Road.

### ***Innovation for future employment uses***

The Land Use Planning Framework (LUPF) accompanying to the Draft EILS includes an *innovation toolbox* to unlock the employment and innovation lands to more high-knowledge workers over time is supported.

In particular, the use of the following incentives is encouraged:

- Floor space/land use incentives
- Live-in Work opportunities
- Affordable employment spaces
- Incentive based LEP provisions

In relation to the Clyburn Precinct the Manchester Road Site provides an opportunity to provide for key growth industries with high worker amenity, employment opportunities and a better transition to adjoining residential lands.

The Draft EILS proposes the use of 'Innovation Criteria' to allow for evidence-based decisions in the consideration of Planning Proposals that seek to change permissible land uses in industrial zones.

In this regard, the lack of demand for the vacant land at Manchester Road for industrial uses is indicative of its unsuitability for this purpose. The Planning Proposal at Manchester Road is consistent with the Criteria in that it will provide opportunities for the location of key growth employment sectors.

The Draft EILS suggests that the planning principles for the precinct should ensure that functional industrial and logistical uses are maintained to support industrial, logistical, transport, freight and waste uses. As well as this, it suggests that to improve the desirability of the precinct for business that vehicular access across the rail line would need to be improved. It also suggests that residential development north of Manchester Road should continue to be limited to minimise land use conflicts.

In line with the above, it is recommended in the report that transport, logistics and freight industries continue to be targeted for the precinct, along with employment uses and businesses that can co-exist with transport and freight industries and environments.

An assessment against the Vision and Strategies in the Draft EILS is detailed below:

Vision and Strategies for Clyburn Draft EILS and LUPF	Comment
<p><i>Vision</i>  <i>The vision for the Clyburn Precinct is to provide Services for the Service Sector; high-value activities crucial to the city's metabolism including manufacturing and maintenance, rail maintenance, waste management and recycling, wholesale and logistics.</i></p>	<p>Agree for the majority of the Precinct, that is, lands north of the railway line and the existing railway uses immediately south of the railway line should be maintained and protected.</p> <p>However, the Manchester Road Site presents an opportunity to be planned and developed to provide a buffer/transition area between the railway/industrial lands to the north and the residential development to the south.</p>
<p><i>Planning Principles</i></p> <ul style="list-style-type: none"> <li>• <i>Ensure the Clyde Intermodal Terminal and Clyde Transfer Terminal have primacy of operation as part of NSW freight infrastructure network.</i></li> <li>• <i>Maintain functional industrial and logistic uses to support the important transport, freight and waste recycling function of the Precinct.</i></li> <li>• <i>Council to work with NSW Government to improve vehicular access across the railway to improve the long-term desirability of the precinct for businesses.</i></li> <li>• <i>Continue to restrict residential development north of Manchester Road to minimise land use conflict.</i></li> </ul>	<p>Agree</p> <p>Agree</p> <p>While a bridge over the railway line in this location is desirable, we understand that previous investigations concluded that this is not feasible and therefore extremely unlikely.</p> <p>Disagree. It is recommended that this principle be amended to read:</p> <ul style="list-style-type: none"> <li>• <i>Continue to <b>manage</b> residential development north of Manchester Road to minimise land use conflict</i></li> </ul> <p>Well-designed residential development integrated with public open space and transitioning from employment uses to the north is an appropriate use of the land to the south of the railway land.</p> <p>The SGS analysis concludes that a viable employment precinct for the site is dependent on a mixed use/residential component as proposed on the Manchester Road Site.</p> <p>Further, a large part of the Manchester Road Site is currently vacant and underutilised. Given its urban location this large landholding presents an opportunity revitalise not only the site but the adjoining Duck River corridor.</p> <p>The incorporation of public open spaces, neighbourhood shops and community facilities into the redevelopment of the Manchester Road Site will benefit not only future residents of the Site but also existing residents in adjoining areas as well as a</p>

Vision and Strategies for Clyburn Draft EILS and LUPF	Comment
<p><i>Target Activities</i></p> <ul style="list-style-type: none"> <li>• <i>Target continued transport and logistics/freight industries.</i></li> <li>• <i>Support employment uses and businesses that can co-exist within the transport and freight environment</i></li> </ul>	<p>significant improvement to existing and future worker amenity.</p> <p>Agree for the lands adjacent to the railway line. Not appropriate for land with no direct access to the railway line or where the only access is through residential areas.</p> <p>Agree. The northern part of the Manchester Road Site is ideally located to provide employment uses and business.</p> <p>Recommend the following additional activity:</p> <ul style="list-style-type: none"> <li>• <b><i>Investigate complementary and innovative employment uses adjacent to the Sydney Trains 'Hub' building.</i></b></li> </ul>
<p><i>Barriers to Vision</i></p> <p><i>Businesses are currently constrained by poor vehicular access across the railway. Council should engage with NSW Government about options for new rail crossings.</i></p> <p><i>Residential growth in the surrounding area could create land use conflicts with the primacy of the logistics, rail and waste transfer activities in Clyburn. Council should ensure any new residential development will not impact upon the viability of these uses.</i></p>	<p>Agree that there is inadequate access across the railway. However, a new rail crossing is extremely unlikely in this location and this is the position accepted by Council. It should therefore be acknowledged by making the following change:</p> <p><i><del>"Businesses are currently constrained by poor vehicular access across the railway. Council should engage with NSW Government about options for new rail crossings."</del></i></p> <p>Agreed. The Clyde Intermodal Terminal is located on the northern side of the railway line and will therefore be unaffected by residential in the south of the precinct.</p> <p>Appropriate planning (for example, the incorporation of open spaces and mixed-use zones as buffer areas) and design considerations (noise mitigation measures) will ensure that any new residential development will not impact the viability of these uses.</p> <p>The Amended Proposal represents a considered and well-designed response which respects the existing industrial and railway uses to the north of the Site. The residential development contained in the Proposal has been designed with the importance of these facilities in mind.</p> <p>It is noted that the endorsed Auburn ELS stated that should access issues not be resolved, that owing to the precinct's proximity to established residential areas, that alternate employment uses and residential uses could be considered.</p>



Vision and Strategies for Clyburn Draft EILS and LUPF	
	Comment
	The Auburn ELS recommended that in the longer term a B5 Business Development zone be considered for the precinct, provided that a change of zone would not prejudice the operations of ongoing rail uses. The proposed B7 zone is considered more appropriate.
<p><b>Actions</b>  <i>The following short-term actions are recommended:</i></p> <ul style="list-style-type: none"> <li>• <i>Retain employment uses in line with the vision, Services for the Service Sector.</i></li> </ul> <p>• <i>Council to engage with NSW Government to include cross rail transport accessibility into strategic planning.</i></p> <p><i>The following medium-term actions are recommended:</i></p> <ul style="list-style-type: none"> <li>• <i>No precinct specific amendments recommended to the planning framework, as the planning framework currently allows the key industries indicated in the vision.</i></li> </ul>	<p>Agree that the existing industrial uses <u>north</u> of the railway line, the railway line and associated uses and the lands south of the railway line, owned by RailCorp should be retained.</p> <p>As discussed previously – a new rails crossing is not feasible and highly unlikely to occur. It is recommended that this action be ruled out.</p> <p>Disagree. The Manchester Road Site is currently underutilised. It is unsuitable for further industrial development due to its immediate proximity to existing residential areas and lack of vehicular access.</p> <p>The unique characteristics of this Site provides an opportunity for urban renewal that respects the significance of the industrial lands while being sensitive to the existing residential areas. This is demonstrated through the retained 6ha Employment Precinct and 1ha business park which could generate up to 2,612 new jobs.</p> <p>It is recommended that this action be deleted and replaced with:</p> <ul style="list-style-type: none"> <li>• <b><i>Declare the site directly to the north of Manchester Road (Lots 11 and 12) an urban renewal investigation area</i></b></li> </ul>
<p><b>Planning Interventions</b></p> <ul style="list-style-type: none"> <li>• <i>Retain sufficient and adequate buffer areas to ensure long term sustainability of this important precinct for activities that support the city's metabolism.</i></li> </ul> <p>• <i>No precinct specific amendments recommended to the planning framework, as the planning framework currently allows the key industries indicated in the vision.</i></p>	<p>Agree. It is recommended that the planning framework be amended to allow additional employment uses on the northern 4ha section of the Site. This will provide an appropriate buffer to the redevelopment of the southern section of the Manchester Road Site.</p> <p>Disagree. Recommend that this intervention be amended to read:</p> <ul style="list-style-type: none"> <li>• <b><i>No precinct specific amendments recommended to the planning framework <u>immediately adjacent to the railway line</u>, as the planning framework</i></b></li> </ul>

Vision and Strategies for Clyburn Draft EILS and LUPF	Comment
	<p><i>currently allows the key industries indicated in the vision.</i></p> <p>For the remaining areas it is recommended that the planning framework be amended to:</p> <ul style="list-style-type: none"> <li>• Allow additional permitted uses on the northern 6ha of the Manchester Road site.</li> <li>• Allow a B7 Business Park zone on the south-eastern 1ha of the Site</li> <li>• Recognise the endorsed <i>Auburn EILS</i> in terms of the area of the Precinct</li> <li>• Provide a large public park and a series of pocket parks which will contribute to high worker amenity for the area.</li> <li>• Allow well designed residential development in the south-western quadrant of the precinct.</li> </ul>

Table 8: Consideration of the Draft EILS 2017

### **Cumberland Interim Affordable Housing Policy**

The July 2017 Cumberland Interim Affordable Housing Policy (Interim AHP) included:

*8. Planning agreements related to planning proposals that would result in potential value uplift should include a contribution to affordable housing, being at least 5% of any potential additional residential floor space or, where impracticable, an equivalent monetary contribution*

This Planning Proposal was lodged under the 2017 Policy.

On 5 July 2018, the Cumberland Interim Housing Policy was adopted by Council, which set the following targets:

- a. The Central City District Plan target of 5 – 10% of new dwellings dedicated for very low and low income households;*
- b. Council's interim target for planning proposals to provide for **15%** of any additional residential floor space for very low and low income households.*

The 2018 policy is a substantial increase from the previous Council policy from 5% to 15% affordable housing target. We also note that this Policy is in contrast the Council's Voluntary Planning Agreements Policy (VPA Policy) which was adopted on 17 September 2017 and includes a target of 5% for Affordable Housing:

*...Planning agreements related to planning proposals that would result in potential value uplift will include a contribution to affordable housing, being at least 5% of any potential additional residential floor space, or where impracticable, an equivalent monetary contribution...*

Consequently, there appears to be a conflict in the affordable housing targets required by Council's VPA policy and Interim AH policy. Importantly, given the targets set out in the Region and District Plans and that the 2017 Planning Proposal was lodged under the VPA policy dated 17 September 2017, the 5% affordable housing target is considered appropriate when considering this Amended Proposal.

PAYCE has guaranteed to initially provide a minimum of 5% or 58 dwellings rented at discount market rental as affordable rental housing (to be secured through a VPA).

***Is the Planning Proposal consistent with Applicable State Environmental Planning Policies?***

***SEPP 19 – Bushland in Urban Areas***

This SEPP applies to the Cumberland LGA and applies to urban remnant bushland on land zoned public open space, seeking to appropriately protect and preserve bushland and habitat. The Site is not zoned open space however the adjoining lands of the Duck River corridor have ecological significance. The significance of the riparian corridor of Duck River is detailed in the *Ecological Assessment Report* by Cumberland Ecology (Attachment 9).

SEPP 19 is relevant to the proposed rehabilitation works along the Duck River Corridor.

***SEPP 55 – Remediation of Land***

SEPP 55 aims to provide for a State-wide consistent planning approach to the remediation of contaminated land, with various objectives and provisions, particularly to reduce the risk of harm to human health and the environment.

Clause 6 of SEPP 55 states that an environmental planning instrument should not include a zone that would change the use of the land, particularly for residential, educational, childcare or hospital uses unless the planning authority is satisfied that the potential risk to human health has been considered.

Similarly, Clause 7 of the SEPP requires the Council to consider whether a Site is contaminated and whether the Site is suitable for the proposed use (before or after remediation). In this regard, the contamination report undertaken by DLA Environmental finds that the land could be made suitable after remediation for the proposed land uses in the Planning Proposal under SEPP 55.

The Land Use Suitability Review and Stage I Preliminary Site Investigation conclude that following the implementation of a Remediation Action Plan and Validation, the Site can be made suitable for the future intended land uses, consistent with the criteria outlined in the National Environment Protection. For the purposes of the SEPP, it is reasonable to conclude that the Site will be able to be made suitable for the proposed uses.

***SEPP 65 – (Design Quality of Residential Apartment Development)***

SEPP 65 and the supporting *Apartment Design Guide* (ADG) seek to improve the design quality of residential apartment development in New South Wales. Nine *Design Quality Principles* are established in the SEPP, while the ADG provides further guidance in expanding upon and meeting such principles.

The amended Masterplan is designed to have close regard to SEPP 65 and associated ADG. The Masterplan is generally compliant with the ADG. The matters relevant in SEPP 65 are capable of being satisfied at development application stage, based on the Masterplan provided. Naturally, details and provisions will need to be carefully considered as the Proposal continues to develop through the planning process.

### ***SEPP (Affordable Rental Housing) 2009***

This SEPP has 7 aims, including to facilitate the effective delivery of new affordable rental housing by providing incentives by way of expanded zoning permissibility, floor space ratio bonuses and non-discretionary development standards. There is currently no affordable rental housing on the Site.

PAYCE has guaranteed to initially provide a minimum of 5% or 58 dwellings rented at discount market rental as affordable rental housing (to be secured through a VPA).

The affordable rental housing would be owned by PAYCE, held for 12-15 years as affordable rental housing and managed by a registered Community Housing Provider (CHP). The management by a CHP will ensure the housing is made available to those in need, and consistent with the provisions of the SEPP and governing regime established by NSW Housing.

The Amended Proposal, and provision of affordable rental housing, is generally consistent with the SEPP (Affordable Rental Housing) and the Council's *Interim Affordable Housing Policy*.

### ***SEPP (Building Sustainability Index: BASIX)***

SEPP - BASIX aims to minimise the demand of residential development upon energy demand and the State's potable water supply, particularly by setting a target of 40% reduced water use and 20% less energy use compared to average usage and verification through a Certification system. Future development applications will need to demonstrate that the BASIX requirements are met.

The requirements of BASIX will be met in the development phase of the Proposal.

### ***SEPP (Infrastructure) 2007***

*SEPP (Infrastructure) 2007* aims to facilitate the effective delivery of infrastructure across the State. This includes by identifying matters to be considered in the assessment of development adjacent to types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.

Many of the provisions relate to development by the Crown and exempt development of certain development by on behalf of the Crown, which is not relevant to the Proposal.

The Site is adjacent to and has a common boundary with land used for rail purposes adjoining a rail corridor. Before determining any development applications on the Site, the consent authority will, in accordance with clauses 85, 86 and 87 of the SEPP, give written notice of the proposed development to the rail authority. Consideration will be given to the potential effects of any excavation on the rail corridor and the potential impact of rail noise or vibration on future residential uses.

Clause 87(3) requires that residential development must not be granted consent unless appropriate measures have been undertaken to ensure that the following LAeq levels are not exceeded:

- (a) in any bedroom in the building—35 dB(A) at any time between 10.00 pm and 7.00 am,
- (b) anywhere else in the building (other than a garage, kitchen, bathroom or hallway)—40 dB(A) at any time.

The amended Masterplan has been designed with respect to the above requirements and the provisions of *Development Near Rail Corridors and Busy Roads – Interim Guideline*. Noise considerations to and from the proposed development have been examined. Consequently, the residential component has been reduced and redesigned to minimise impacts from adjoining rail uses. Additional amelioration measure can be incorporated through the detailed design stage.

Acoustic Logic Consultancy have conducted an acoustic assessment of potential noise impacts associated with the Amended Proposal (Attachment 4). Given the Site's proximity to the Auburn Rail Maintenance and Stabling Yards, Sydney Trains have raised concerns that future residential development may restrict operations on the site due to noise impacts on future receivers.

Train noise from the maintenance yards is the primary source of noise and vibration affecting the proposed development. The rail corridor is also the primary vibration source affecting the development. Noise and vibration monitoring have been previously undertaken at the site.

In response to the concerns raised by Sydney Trains, the Amended Proposal has increased the separation of the proposed residential development from the Stabling Yards as shown below.

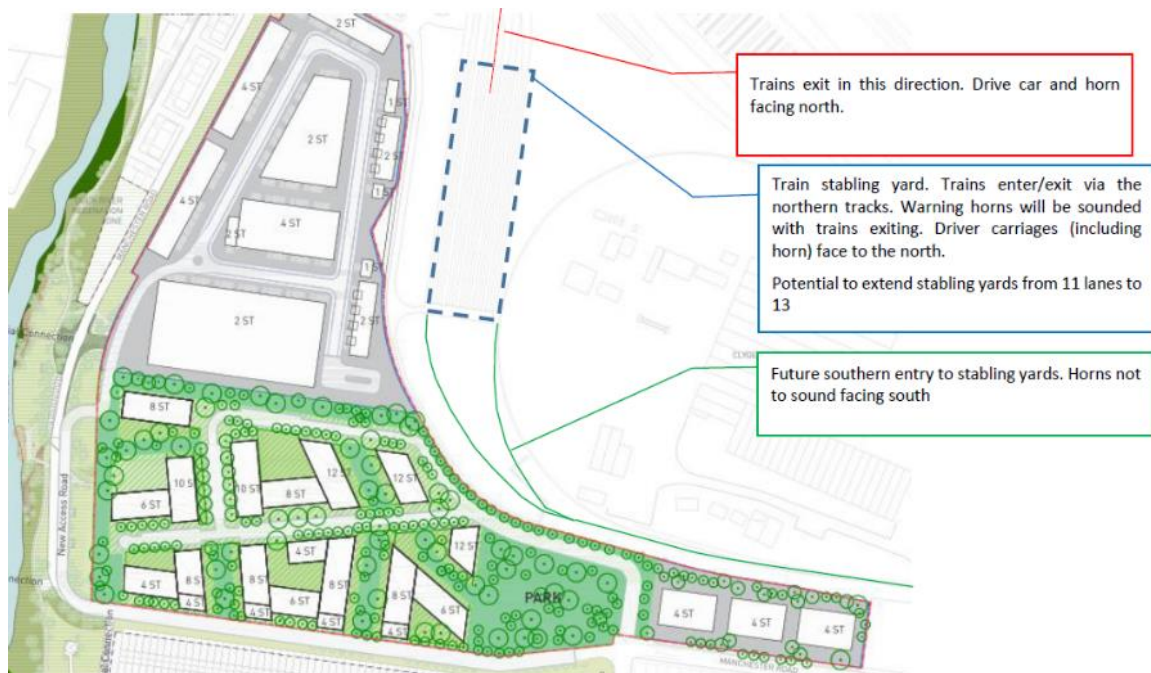


Figure 45. Location of Noise sources to the Amended Proposal (source: Acoustic Logic)



As well as reducing the total number of buildings located along the curved acoustic wall, a green buffer area between the rail uses and the residential development has been incorporated in the Amended Masterplan.

As detailed in the Figure below, additional treatments to the facades directly facing the rail yards may require additional acoustic treatment to essentially future proof reasonable levels of noise from future development within the rail yard.

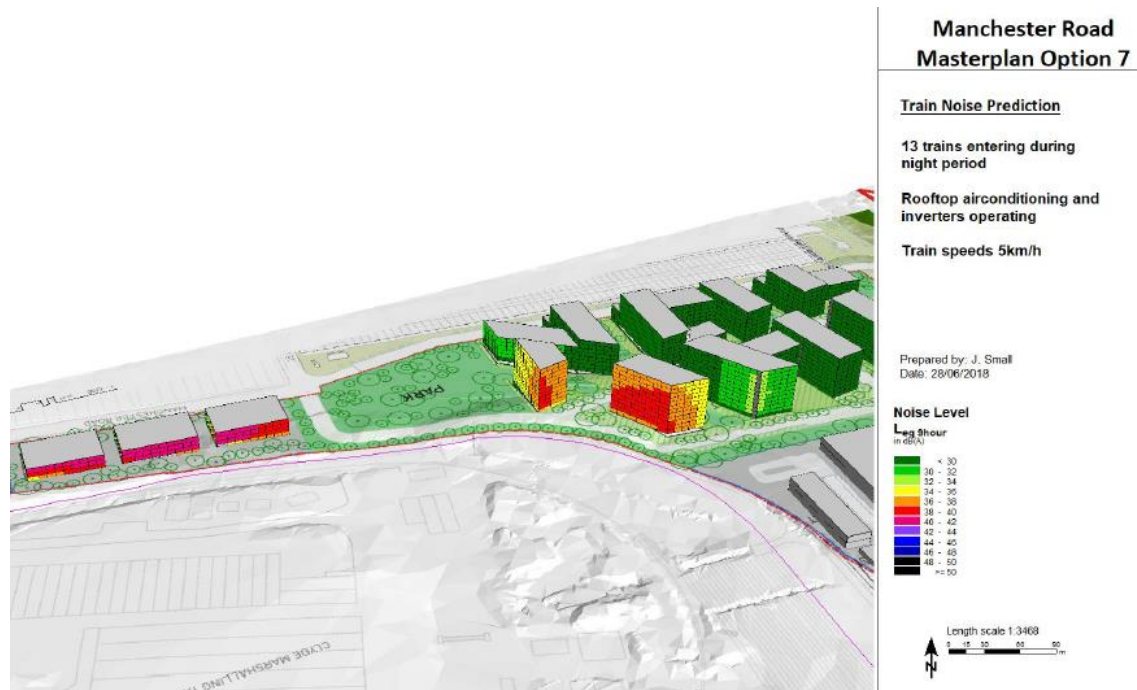


Figure 46. Predicted noise levels (source: Acoustic Logic)

The Noise Impact Assessment has been a critical input into the Amended Proposal, given the importance of the adjoining industrial land. This analysis has guided the proposed built form outcomes and concludes the following:

- Predicted noise level from train movements on the future southern rail line will have negligible impact on the development.
- Predicted noise levels from worst-case noise levels (i.e. horns) within the stabling yards have been assessed and will be unlikely to cause awakening reactions even with windows open.
- General noise levels associated with the site have been previously assessed in the ALC documents submitted with the planning proposal.
- Noise contour plots indicate that buildings along the boundary will provide substantial acoustic screening to buildings central to the development from noise sources within the stabling yards.

Clause 104 of Division 17 identifies the capacity or size of developments, including apartments or residential flat buildings with 300 or more dwellings, that require referral to Roads and Maritime Services (RMS). Both RMS and Transport for NSW will need to continue to be closely consulted throughout the Planning Proposal process, given the potential impacts (and opportunities) of the development on the adjoining road network, and wider commitments for public transport enhancement associated with the Proposal.

### ***SEPP (State and Regional Development) 2011***

SEPP (State and Regional Development) 2011 outlines criteria and processes associated with certain types of development (or within certain areas) deemed to be of State or Regional Significance, and the associated determination regime for such development.

Future development applications for the Site would be subject to the SEPP and are proposed to be determined under Part 4 of the EP&A Act.

Where development has a capital investment value between \$10 million and \$30 million, Council staff would undertake the assessment of the application although the determination function would be exercised by the Sydney Western City Planning Panel.

### ***Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005***

The Site is not within a zoned area of *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*, although the generic provisions of the deemed SEPP apply.

There are provisions within Part 2 of the Plan which outline principles within the wider catchment (Clause 13) and Waterway Area (Clause 14).

The Sydney Harbour Catchment SREP boundary encompasses much of the land within the Cumberland LGA and directly affects some areas. The Proposal is located within the overall Sydney Harbour catchment boundary, but is not directly impacted by the provisions of the SREP other than in meeting stormwater quality standards and the associated proposal to assist with the rehabilitation of Duck River. The Proposal is consistent with the principles for the wider catchment.

There are 12 objectives related to the Sydney Harbour Catchment in Clause 13 of the Plan. The Planning Proposal reasonably considers these matters and development of the Site has key potential benefits in terms of water quality and water treatment to improve runoff and better connections to and along the harbour foreshores.

### ***State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017***

This policy applies to the non-rural LGAs of the NSW and therefore applies to the Site. The aims of this Vegetation SEPP are to protect the biodiversity values of trees and other vegetation and to preserve the amenity of non-rural areas through the preservation of trees and other vegetation.

The Vegetation SEPP works together with the *Biodiversity Conservation Act 2016* and the *Local Land Services Amendment Act 2016* to create a framework for the regulation of clearing of native vegetation in NSW.

The SEPP will ensure the biodiversity offset scheme (established under the Land Management and Biodiversity reforms) will apply to all clearing of native vegetation that exceeds the offset thresholds in urban areas and environmental conservation zones that does not require development consent.

The Vegetation SEPP applies to clearing of:

- native vegetation above the Biodiversity Offset Scheme (BOS) threshold where a proponent will require an approval from the Native Vegetation Panel established under the Local Land Services Amendment Act 2016; and
- vegetation below the BOS threshold where a proponent will require a permit from Council if that vegetation is identified in the council's development control plan (DCP).

As the Site has very little vegetation, point 1 above is not relevant. Any removal of trees on the site will be subject to an application for a permit for tree removal from Cumberland Council.

***Is the Planning Proposal consistent with applicable Ministerial Directions (s.117 directions)?***

The Proposal is consistent with the relevant Local Directions issued by the Minister for Planning under S9.1 (formerly S117) of the EP&A Act as detailed in the Table below:

Ministerial Direction	Consistent	Comment
<b>1. Employment and Resources</b>		
<b>1.1 Business and Industrial Zones</b>		
Objective: (a) encourage employment growth in suitable locations	Yes	<p>The Amended Proposal complies with this objective</p> <p>The proposed urban renewal of the Site is consistent with the objectives of the zone as follows:</p> <ul style="list-style-type: none"> <li>• The Proposal seeks to provide for new and alternate employment uses</li> <li>• The Proposal provides for up to 2,612 direct new jobs which exceeds the existing jobs on the Site (50) to transition the Site to a more contemporary employment centre</li> <li>• The Proposal is supported by studies that indicate that it will support the viability and seeks to protect existing identified centres of Auburn and Lidcombe</li> </ul> <p>The Proposal is justified by several studies to support the rezoning of the part of the Site from an IN1 General Industrial Zone to a combination of business, recreation and residential zones, namely various economic studies prepared by SGS.</p>
Objective: (b) protect employment land in business and industrial zones		<p>The Amended Proposal complies with this objective.</p> <p>The Site currently contains several older warehouse buildings. Combined, the buildings currently located on the Site accommodate approximately 50 jobs. The Amended Proposal envisages development of the Site to accommodate:</p> <ul style="list-style-type: none"> <li>• a minimum of 7.2ha of employment land</li> <li>• 60,000m<sup>2</sup> of medium and large industrial GFA</li> <li>• 15,000m<sup>2</sup> of business/urban service GFA</li> </ul> <p>The Proposal will provide for a total of 1,338 direct jobs on the Site, with a total of 5,900 direct and indirect operational and construction jobs.</p>

Ministerial Direction	Consistent	Comment
Objective: (c) support the viability of identified strategic centres		<p>The Amended Proposal complies with this Objective.</p> <p>The Amended Proposal provides new homes, jobs and investment in Cumberland in accordance with <i>the Region Plan</i> which states that the Central City Subregion will;</p> <p><i>...grow substantially, capitalising on its location close to the geographic centre of Greater Sydney. Unprecedented public and private investment is contributing to new transport and other infrastructure leading to major transformation...</i></p> <p>The Amended Proposal supports the viability of nearby Auburn and Granville both of which are identified as local centres.</p>
1.2 Rural Zones	N/A	N/A
1.3 Mining, Petroleum Production and Extractive Industries	N/A	N/A
1.4 Oyster Aquaculture	N/A	N/A
1.5 Rural Lands	N/A	N/A
<b>2. Environment and Heritage</b>		
2.1 Environment Protection Zones	N/A	N/A
2.2 Coastal Protection	N/A	N/A
2.3 Heritage Conservation	Yes	<p>The Proposal complies with this Direction.</p> <p>A detailed heritage assessment of heritage impacts has been undertaken for the Site by Casey and Lowe.</p> <p>The Heritage Assessment concluded that <i>"in the absence of any identified heritage structures, archaeological Sites or features, or industrial vistas within the study area, re-zoning of the study area will lead to no loss of heritage values"</i></p>
2.4 Recreation Vehicle Areas	N/A	N/A
<b>3. Housing, Infrastructure and Urban Development</b>		

Ministerial Direction	Consistent	Comment
3.1 Residential Zones	Yes	<p>The Amended Proposal complies with this objective</p> <p>The amended Masterplan supported by guiding principles and Urban Design Report for the Site provides high quality and sustainable residential apartments with a mix of sizes.</p> <p>The proposed new housing is within walking distance to Clyde and Auburn train stations and has access to existing bus services.</p> <p>The Amended Proposal is consistent with Direction 3.1, as it proposes to:</p> <ul style="list-style-type: none"> <li>• reinforce the governments key strategic policy of the 30-minute city</li> <li>• increase housing supply in an urban location with a mix of dwelling sizes;</li> <li>• makes more efficient use of urban land optimising the use of existing public transport infrastructure and services;</li> <li>• offers well connected housing in an urban location that can reduce the consumption of land for housing on the urban fringe, and</li> <li>• demonstrates good urban and environmental design, with an urban form and structure characterised by suitable building forms, public parks and spaces, new pedestrian and cycle pathways and improvements to the Duck River riparian corridor.</li> </ul>
3.2 Caravan Parks and Manufactured Estates	N/A	N/A
3.3 Home Occupations	N/A	<p>The Amended Proposal complies with this objective</p> <p>The Amended Proposal will allow home occupations in accordance with the provisions of the Auburn LEP 2010.</p>
3.4 Integrating Land Use and Transport	Yes	<p>The objective of this Direction 3.4 is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</p> <ol style="list-style-type: none"> <li>improve access to housing, jobs and services by walking, cycling and public transport, and increase the choice of available transport and reduce dependence on cars;</li> <li>reduce travel demand including the number of trips generated by development and the distances travelled, especially by car;</li> <li>support the efficient and viable operation of public transport services, and provide for the efficient movement of freight.</li> </ol> <p>As discussed in previous sections, the Amended Proposal is consistent with this direction as it allows an underutilised Site to make better use of its proximity to major public transport and other services to assist the reduction in car dependency and travel demand in general.</p>



Ministerial Direction	Consistent	Comment
3.5 Development Near Licensed Aerodromes	N/A	N/A
3.6 Shooting Ranges	N/A	N/A
<b>4. Hazard and Risk</b>		
4.1 Acid Sulphate Soils	Yes	<p>The objective of this direction is to avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils. This direction applies to all relevant planning authorities that are responsible for land having a probability of containing acid sulfate soils, as shown on Acid Sulfate Soils Planning Maps. Auburn LEP 2010 illustrates the potential for Class 4 and Class 5 Acid Sulphate Soils on the Site, which are classified as the least sensitive classes of Acid Sulphate Soils.</p> <p>Analysis of the Acid Sulfate Soils Map – Sheet ASS_002 of Auburn LEP 2010 indicates that the majority of Lot 11 is located within a Class 4 affected area.</p> <p>Auburn LEP 2010 will therefore require that an Acid Sulphate Soil Management Plan be provided with future development applications for the Site. The Planning Proposal is consistent with this direction.</p>
4.2 Mine Subsidence and Unstable Land	N/A	N/A
4.3 Flood Prone Land	Yes	<p>The Amended Proposal complies with this Direction.</p> <p>The Auburn LEP 2010 flood prone map shows that the Site is not located within the defined Flood Planning Area.</p> <p>However, Council's Flood Study indicates that a PMF event could affect the Site. Direction 4.3 therefore applies to the Site, as the Site is located within 'flood prone land', which is defined in the Floodplain Development Manual, 2005 as 'Land susceptible to flooding by the Probable Maximum Flood (PMF) event'.</p> <p>Whilst the Site is located within the area potentially affected by a PMF event, it is not located within the flood planning area mapped in Auburn LEP 2010 and is therefore consistent with the Direction. Refer to Flood Management Advice at 8.</p>
4.4 Planning for Bushfire Protection	N/A	N/A
<b>5. Regional Planning</b>		
5.1 Implementation of Regional Strategies	N/A	N/A
5.2 Sydney Drinking Water Catchments	N/A	N/A
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	N/A	N/A

Ministerial Direction	Consistent	Comment
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	N/A	N/A
5.5 Development in the vicinity of Ellalong, Paxton and Millfield (Cessnock LGA)(Revoked 18 June 2010)	N/A	N/A
5.6 Sydney to Canberra Corridor (Revoked 10 July 2008. See amended Direction 5.1)	N/A	N/A
5.7 Central Coast (Revoked 10 July 2008. See amended Direction 5.1)	N/A	N/A
5.8 Second Sydney Airport: Badgerys Creek	N/A	N/A
5.9 North West Rail Link Corridor Strategy	N/A	N/A
5.10 Implementation of Regional Plans		The Amended Proposal is consistent with <i>A Metropolis of Three Cities</i> the region plan for Greater Sydney and achieves the overall intent of the Regional Plan and it does not undermine the achievement of its vision, land use strategy, goals, directions or actions.
<b>6. Local Plan Making</b>		
6.1 Approval and Referral Requirements	Yes	<p>Direction 6.1 requires that LEP provisions encourage the efficient and appropriate assessment of development. Planning proposals must be substantially consistent with the terms of this direction.</p> <p>As a standard template instrument, Auburn LEP 2010 contains the relevant referral provisions to ensure the efficient and appropriate assessment of development.</p> <p>Should this Amended Proposal proceed, as an amending instrument to Auburn LEP 2010, it will be consistent with this direction.</p> <p>The Amended Proposal does not include consultation, concurrence or referral above and beyond the provisions of the Auburn LEP 2011. The Proposal does not include designated development.</p> <p>The Amended Proposal complies with Direction 6.1.</p>

Ministerial Direction	Consistent	Comment
6.2 Reserving Land for Public Purposes	Yes	<p>The Amended Proposal complies with this direction.</p> <p>The Amended Proposal seeks to rezone part of the existing private land to RE1 Public Recreation with the relevant approval of Cumberland Council and the other authorities as required.</p> <p>The land proposed to be zoned RE1 – Public Recreation will be dedicated to Council by way of a VPA.</p>
6.3 Site Specific Provisions	Yes	<p>The Amended Proposal complies with this direction.</p> <p>Direction 6.3 seeks to discourage unnecessarily restrictive Site-specific planning controls.</p> <p>The Amended Proposal seeks to rezone the Site to several zones in accordance with the Standard Instrument (SI). The proposed additional permitted uses in the IN1 zone are aimed at expanding the range of employment uses on the site and are of minor significance.</p>
<b>7. Metropolitan Planning</b>		
7.1 Implementation of A Plan for growing Sydney	Yes	The Amended Proposal is consistent with the relevant Goals and directions in the Strategy as outlined in this report.
7.2 Implementation of Greater Macarthur Land Release Investigation	N/A	N/A
7.3 Parramatta Road Corridor Urban Transformation Strategy	Yes	N/A
7.4 Implementation North West Priority Growth Area Land Use and Infrastructure Implementation Plan	N/A	
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	N/A	<p>The objective of this direction is to ensure development within the Greater Parramatta Priority Growth Area is consistent with the Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan dated July 2017.</p> <p>The Amended Proposal is consistent with this direction.</p>
7.6 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	N/A	N/A
7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor	N/A	N/A

Table 9 - Consideration of Section 9.1 (formerly Section 117) Planning Directions

### 8.3.3 Section C - Environmental, Social and Economic Impact

***Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the Proposal?***

The Site was formally part of the Clyde Marshalling Yards, with part of the Site used as an active industrial site. The western half of the Site is categorised by several large warehouses, stockpiling yards and car parks. The eastern half of the subject site is remediated and vacant land.

An Ecological Impact Assessment (EIA) has been prepared by Cumberland Ecology (Attachment 9) which assesses the potential impacts from the Proposal on threatened species, populations and ecological communities (TECs) listed under state and federal legislation, including the Grey-headed Flying-fox (*Pteropus poliocephalus*), Green and Golden Bell Frog (*Litoria area*) and River-flat Eucalypt Forest Endangered Ecological Community (EEC).

The Report notes that the Site has been entirely cleared of native vegetation, with no remnant woodland or forest remaining on the site. Low numbers of urban plantings are retained around buildings and in the eastern portion of the site, large bare areas have been established with exotic grasses, presumably for soil stabilisation.

As the Site is separated from the Duck River riparian corridor to the west by Manchester Road, any existing vegetation is completely disconnected from any canopy vegetation in the Duck River corridor.

The EIA is an update of an assessment undertaken for the original Proposal for the Site. The Report has also been updated to include any species listed under state and federal legislation since the earlier (March 2016) Ecological Impact Assessment.

This updated EIA has been prepared to address issues raised in the previous application and address the Proposal (it is considered to be still relevant to the Amended Proposal) as detailed in a relevant extract below:

*.. the former Auburn City Council advised that several native vegetation communities listed as TECs under the NSW Threatened Species Conservation Act 1995 (TSC Act) are known to be present in the riparian corridor of Duck River. Council also noted that a Grey-headed Flying-fox colony is known to occur along the upper Duck River, to the immediate south of the railway pedestrian bridge and railway line. Grey-headed Flying-fox is a Vulnerable species listed under the NSW TSC Act and also under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).*

*Due to the proximity of the TECs and the Grey-headed Flying-fox colony, Council requested that Assessments of Significance prepared in accordance with Section 5A of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) are provided with the Planning Proposal to assess the potential impacts on these matters from future residential development of the subject site. Council also indicated that the impacts of Grey-headed Flying-fox on the amenity of future residents should be discussed and mitigation measures proposed to minimise potential resident/colony conflicts.*

*A review of flora and fauna records within a 10 km radius of the subject site (i.e. the 'locality') was undertaken. Threatened species records were obtained from the Atlas of NSW Wildlife*

database, which is administered by the NSW Office of Environment and Heritage (OEH, 2015a).

A list of nationally protected species predicted to occur within the locality was generated using the Commonwealth Department of the Environment and Energy (DoEE) Protected Matters Search Tool (DoE, 2016a).

Updated searches of both databases were undertaken on 22 September 2017 in order to identify any additional species that may have been listed since the earlier searches were undertaken. These records and species predictions were also duly considered and their likelihood of occurrence on the subject site assessed...

The EIA has been updated following an assessment of comments from Council and other stakeholders, and results from the database assessment. The following entities are covered within the scope of the EIA:

- Grey-headed Flying-fox
- Green and Golden Bell Frog (*Litoria aurea*)
- Tadgell's Bluebell (*Wahlenbergia multicaulis*)
- Migratory wading (i.e. wetland) birds (listed under Section 209 of the Environment Protection and Biodiversity Assessment Act 1999, or EPBC Act)
- Threatened ecological communities.

Following survey and assessment, the EIA concludes that the Proposal is unlikely to have a significant impact on TECs and Grey-headed Flying-fox.

#### *Recommendations to manage any potential risks to TECs*

The EIA makes the following recommendations to manage the risks on TECs and the nearby flying-fox colony, and to minimise the risk of human conflicts with the colony:

- Maintaining a buffer of at least 100 m between the camp and any residential land use, as recommended in the Duck River Grey-headed Flying-fox Management Plan (Dragonfly Environmental, 2014);
- Implementing a well-considered landscape management plan that does not attract large numbers of flying-foxes to the residential areas to feed, thus reducing interactions with residents and potential damage to property;
- Implementing detailed erosion, surface water and sewerage management plans to minimise the offsite impacts on the TECs and Grey-headed Flying-fox habitat in the adjacent Duck River corridor;
- Considering a number of design potentials to minimise resident/bat conflicts such as:
  - Underground parking spaces to limit potential damage to vehicles from bat excrement
  - Double glazing of windows facing the camp;
  - Appropriate sound insulation in the building;
  - Limiting the number of windows facing the camp, or requiring non-opening windows;
  - Installing of air conditioners; and
  - Outdoor areas, including balconies and courtyard gardens, positioned away from the river/camp
- Undertaking acoustic testing during construction phases as required to monitor and manage noise levels affecting the camp site



- Timing construction works as required to avoid critical birthing and pup-rearing phases of the species' life cycle;
- Timing restoration works in the Duck River corridor (especially approaching the specific camp site area) to avoid critical birthing and pup-rearing phases of the species' life cycle;
- Facilitating community awareness of Grey-headed Flying-fox to encourage better understanding of the species' behaviours and options available to reduce risk of disturbance to residents;
- Approaching restoration works in the Duck River corridor in a manner that will maintain structural layers at any point in time and not cause further harm to the colony (i.e. retaining exotic trees and understorey cover until replanted vegetation can develop sufficiently to provide shelter for the colony);
- Approaching restoration works in the buffer between the camp and any residential land, so as not to result in expansion of the bat colony. This will include considering the use of plants that are not preferred flying-fox habitat species in landscaping plans, or limiting works to bank stabilisation and weed control as required; and

The amended Masterplan and allocation of landuses, in particular residential uses are consistent with these recommendations.

### ***Threatened Ecological Communities***

The EIA concludes that the Planning Proposal unlikely to result in a direct impact on TECs (this is still considered relevant to the Amended Proposal). The updated report notes that no TECs occur within Site and no vegetation loss within the adjacent Duck River corridor is proposed as part of the planned future residential development. Any rehabilitation work undertaken as part of the regeneration of the Duck River will be undertaken in close consultation with Council and the appropriate authorities.

The EIA makes the following conclusions in relation to potential impact on TECs near the site (bold our emphasis):

*... that Planning Proposal may exacerbate indirect threatening processes that can continue to degrade the TECs in the adjacent Duck River corridor. Pollution from urban runoff and higher density occupation of the subject site may increase weed impacts on the riparian zone. However, the development of the subject site is likely to involve detailed erosion, surface water and sewerage management plans and it is expected that the risks will be manageable.*

*Furthermore, the proponent is proposing to undertake restoration activities along Duck River, which will also mitigate the potential impacts on riparian vegetation and facilitate the recovery of the TECs.*

*It is concluded that the Planning Proposal is **unlikely to result in a significant impact on TECs. As such, no Species Impact Statement is required....***

## Threatened Species

The EIA concludes that the Proposal is unlikely to result in a significant impact on Grey-headed Flying-fox. As such, no Species Impact Statement and no EPBC Act referral are required.

Key conclusions from the EIA in relation to potential impacts on any threatened species follows:

*...no threatened flora or fauna species were found or considered likely to occur on the subject site other than Grey-headed Flying-fox, which camp nearby in the Duck River riparian corridor. No migratory species are considered to make significant use of the subject site.*

*No Grey-headed Flying-fox were found to be using the camp at the time the site was surveyed. Fly-out patterns could not be observed and assessed further.*

*Notwithstanding, the main threat to any Grey-headed Flying-fox colony is likely to be from loss of habitat at the camp site, or loss of foraging habitat within 20-50 km of the camp site (which would reduce the suitability of the camp for prolonged periods of roosting and breeding).*

*At the Duck River site, the indirect impacts to a colony due to noise, heat, interactions with humans and altered fly-out patterns are not likely to be a significant issue.*

*The Planning Proposal will not remove roosting or foraging habitat within 20-50 km of the camp site. The potential impacts from interactions with future residents, change in noise levels and possible offsite effects on the quality of the riparian vegetation along Duck Creek are not expected to be significant and are likely to be manageable.*

*The proponent is also proposing to implement a restoration program for the riparian vegetation along a section of Duck River upstream of the camp site, which will improve foraging habitat and the suitability of the camp site for roosting.*

*Further and more detailed studies of flying foxes will be made during later stages of the planning and design process to ensure that negative resident and flying-fox interactions will be minimised....*

The Amended Proposal and Masterplan has been formulated based on the assessments within the EIA. Based on the conclusions and recommendations of the EIA, the likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the Proposal has been satisfactorily addressed in this Amended Proposal.

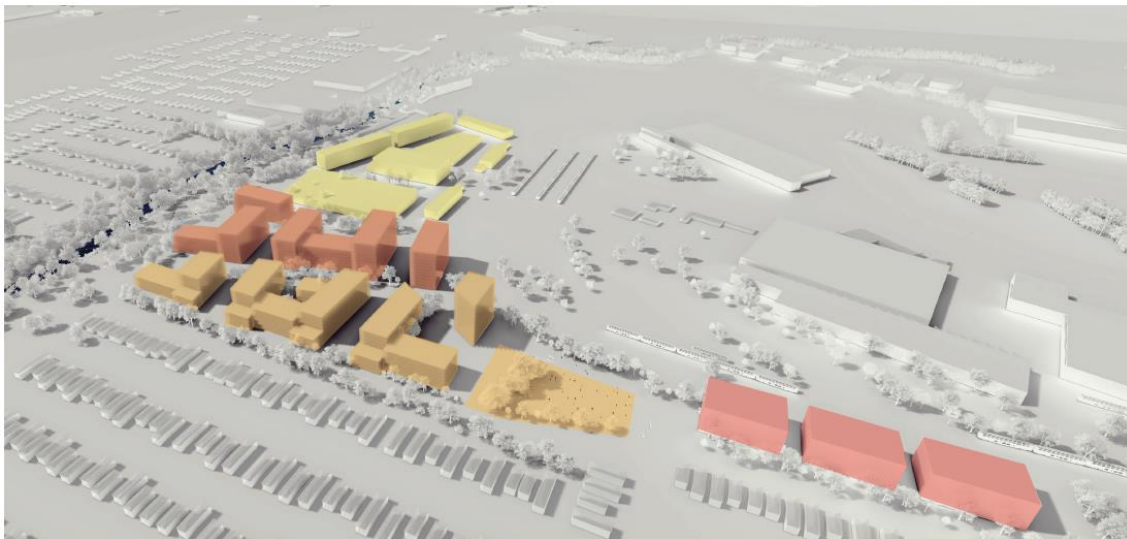
***Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?***

## ***Built Form and Amenity***

The amended Masterplan is designed to have close regard to SEPP 65 and associated ADG. This seeks to reduce impacts to adjoining properties and ensure high levels of amenity for future communities. The proposed built form is justified in this location based on the following rationales adopted for the Masterplan:

#### *Location and orientation of Built Form*

- building heights range between 2-12 storeys, with tall buildings in the centre of the site
- relocation of residential buildings away from adjoining railway uses and associated potential landuse conflict through amended urban design, increased employment uses and reduced residential yield
- medium rise 4 storeys residential development located along the southern boundary to aid with the sensitive transition of the Site to the neighbouring low-rise dwellings in Manchester Road
- taller buildings are designed with smaller footprints, rather than lower bulkier buildings to achieve larger and improved public domain, parks and open space outcomes for the Site
- taller buildings are located to minimise impacts on adjoining residential properties in terms of excessive overshadowing, overlooking, bulk and scale visual impacts
- the Masterplan proposes an average of circa 6 storeys across the Site, with only 3 buildings at 12 storeys avoiding a monotonous height across the Site leading to improved urban design outcomes



**PTW**

LEGEND: STAGE 1 STAGE 2 STAGE 3 STAGE 4

Figure 47. Proposed built form and staging (Source: PTW)

#### *Transition Zones*

- to ensure a sensitive transition to existing low-density dwellings along Manchester Road, all development with an address to Manchester Road will be limited to 4 storeys
- all other development along the western and southern boundaries will be 4 - 6 storeys; to help transition building heights
- western boundaries are co-located with open space buffers to assist in the transition of building forms

#### *Building Orientation*

- A graduation of building height will provide site orientation and view sharing toward Duck River.
- New built form is arranged to provide optimum solar orientation and building energy performance.



*Landscaping and Green Spaces will be provided in the form of:*

- Recreational and environmental improvement along the Riparian Duck River;
- Public open space parkland
- Linear parkland links across the site
- The public domain of the streetscape.

#### *FSR Assumption*

- realistic assumptions regarding FSR relationship to envelopes to allow good articulation with the residential area with the southern 8.1ha having an FSR of 1.5:1 and the northern industrial zone retaining the FSR of 1:1

#### **Heritage**

A detailed assessment of heritage impacts (HIA) has been undertaken for the Site by Casey and Lowe (Attachment 6). This report followed a report prepared for the previous Planning Proposal for the Site, which identified no impacts in relation to aboriginal and European heritage. Key findings and observations in the current report are detailed below.

Clyde Railway Yards & Signal Box is listed as a heritage item in Auburn LEP 2010 as an archaeological Site and listed on RailCorp's S.170 register (under the provisions of the NSW Heritage Act 1977) as a goods yard with potential archaeological features. Details of the Clyde Railway Yards & Signal Box heritage item listing are provided below:

The S170 listing specifically mentions the potential for archaeological remains:

#### *Potential Archaeological Features*

There is a potential for remnants of early structures within the Goods Yard, which requires further archaeological assessment. The site was analysed by archaeologist Edward Higginbotham for the Auburn Heritage Study in 1995, who established that there was physical evidence of heritage significance. The scattered nature of the remains is most likely the reason why the site is listed on the Auburn LEP as an archaeological site. The site has continued to be degraded since assessed in 1995.

The listing specifically excludes any aboveground structures. This listing excludes property not owned by RailCorp and all above surface buildings and structures. The HIA advises that the effect of listing on the S170 register is that an appropriate approval, in this case a S139/140 approval under the *Heritage Act 1977*, be obtained prior to the disturbance of significant archaeological remains, if these exist within the site area. The site is listed on the Auburn LEP as an archaeological site. This listing appears to derive from its inclusion in the Auburn Heritage Study where its heritage significance was defined as:

*The Clyde Marshalling Yard is significant in demonstrating the large volume of railway goods traffic generated by the Sydney Metropolitan area, both in historical and current terms. It also demonstrated the close relationship between local industry and rail transport.*

The HIA reviews the heritage values of the Site in terms of:

- its role as a potential archaeological Site
- railway heritage
- industrial heritage



In terms of any archaeological heritage impacts, the HIA notes the following (bold our emphasis):

*...The study area appears to have been termed an archaeological site when it retained evidence of its use from the end of the nineteenth century as part of the Clyde Marshalling Yards, and railway tracks, sidings and buildings associated with its railway use were still present. Lots 11 and 12 no longer retain evidence of being part of the marshalling yards and the land has been cleared and apparently remediated in places. **Apart from some stray artefacts relating to rail infrastructure, there is no evidence that the site contains buried remains or remains that would have archaeological research potential ...***

In relation to railway heritage impacts, the HIA makes the following assessment:

*...The present study area is effectively separated from the remainder of the Clyde Marshalling Yards by the existing fencing and noise wall. There are no visual links or signs that indicate the land was once part of the Marshalling Yards. There are no remaining elements of industrial heritage or evidence of the land's previous use as part of the marshalling yards...*

In relation to potential industrial heritage impacts, the HIA makes the following assessment:

*...The study area has industrial elements in the form of the warehousing, although the warehousing is not linked to the railway use of the land or the marshalling yards further to the north. The existing warehousing has not been identified as being of heritage value and does not reflect the use of the land as part of the marshalling yards...*

The HIA concludes that the Planning Proposal does not result in any adverse heritage impacts as detailed below:

*...The land in question is expected to retain no elements relevant to its original heritage listing as part of the Clyde Marshalling Yards. It contains no identified heritage elements and has been physically separated from the remaining marshalling area. The original heritage listing, therefore, cannot be sustained and is no longer relevant. In the absence of any identified heritage structures, archaeological sites or features, or industrial vistas within the study area, re-zoning of the study area will lead to no loss of heritage values within the Auburn Local Government Area...*

These findings are considered to be relevant to the Amended Proposal.

### **Transport and Traffic**

A revised Traffic and Transport Impact Assessment (TIA) has been undertaken by Jacobs (Attachment 2). Their report assesses the existing traffic and transport conditions and an assessment of the impact of the development on the transport network.

Manchester Road provides the primary vehicular access to the southern edge of the site, served by Chisholm Road from the south. Further south, Mona Street provides the closest vehicular crossing of Duck River. A private road owned by RailCorp continues west from Manchester Road and provides additional access points along the southern and western boundaries of the site.

Under the provisions of the Amended Proposal, vehicular access to the residential component of the Site would be via a new access road that would align with Chisolm Road.

The intersection of Chisolm Road and Manchester Road is proposed to be converted to a roundabout to facilitate traffic movements as part of the access arrangements.

The industrial component of the site will continue to be served by the private road while the business component would have direct access from Manchester Road.

The existing road network is constrained by the operation of intersections at Mona Street / Clyde Street and South Parade / Rawson Street. Traffic modelling has identified future capacity issues and significant delays at other intersections as a result of the proposed land use and traffic generated by the site. The TIA has modelled the following 2 scenarios:

- Scenario 1: Do minimum
- Scenario 2: Intersection upgrades including
  - Extension of turn bays in South Parade
  - Signalising of the Manchester Road / Cumberland Road intersection from a roundabout
  - Signalising Redfern Street / Clyde Street to be coordinated with Mona Street / Clyde Street.
  - An additional right turn bay at Mona Street / Chisholm Road.

The results of the traffic modelling with the proposed intersection upgrades are shown in Table 4.12. With the proposed intersection upgrades, the intersections would operate at Level of Service 'D' or better.

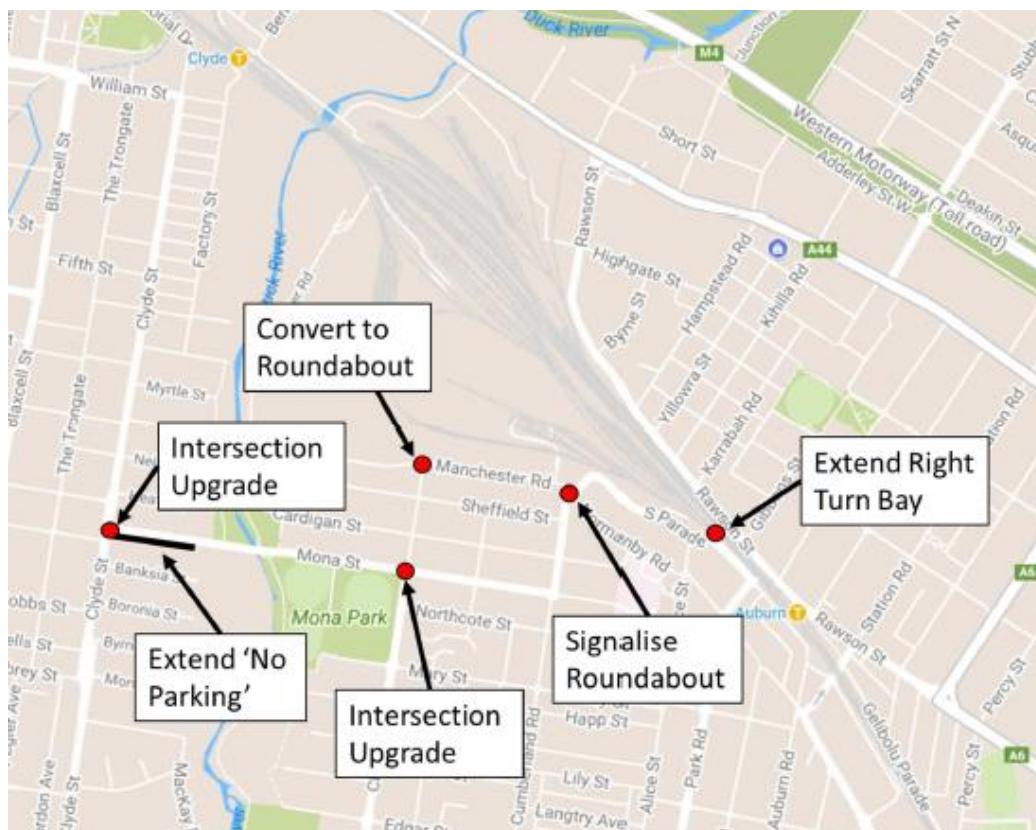


Figure 49. Intersection mitigation measures (source: Jacobs)

### Public Bus Routes

The local bus routes are shown in the Figure below. Routes S2 and S3 only operate in peak commuter periods. Bus route 908 operates from Bankstown to Merrylands via Birrong and Auburn.

The buses are operated by Busways and have approximately 60 – 30-minute headways during peak periods. There are bus stops located approximately 200m walking distance south of the site on Cumberland Road and Mona Street.

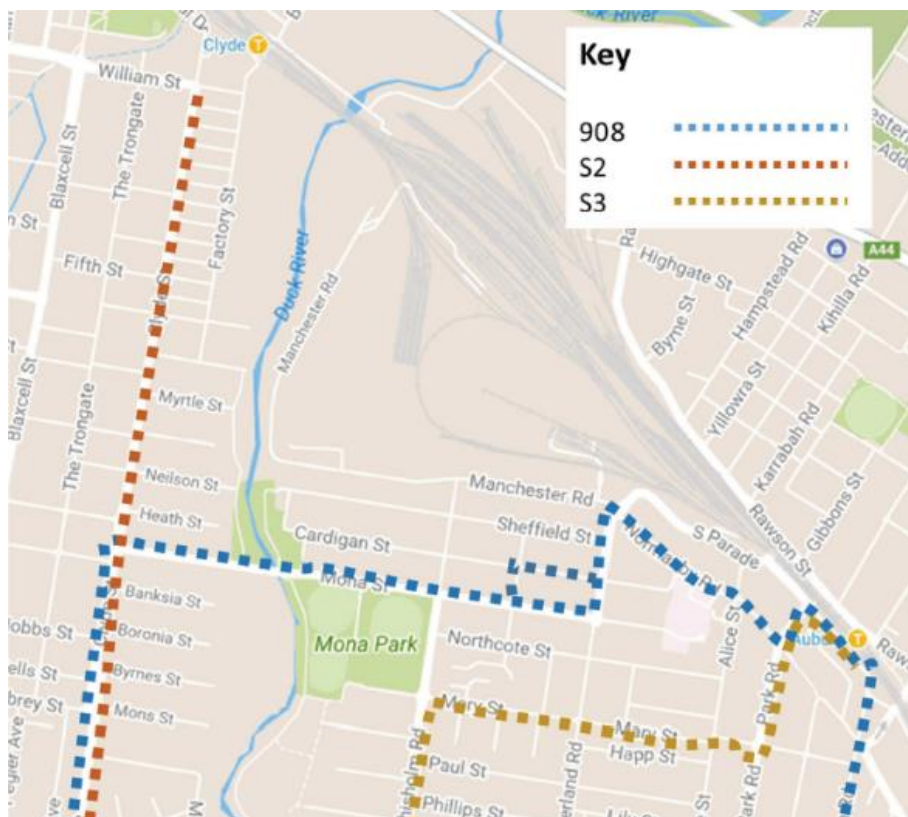


Figure 50. Bus routes (source: Jacobs)

The TIA identifies an opportunity to improve bus services by modifying the existing bus route 908 to service the site along Manchester Road and provide a bus connection to Auburn Station.

## Trains

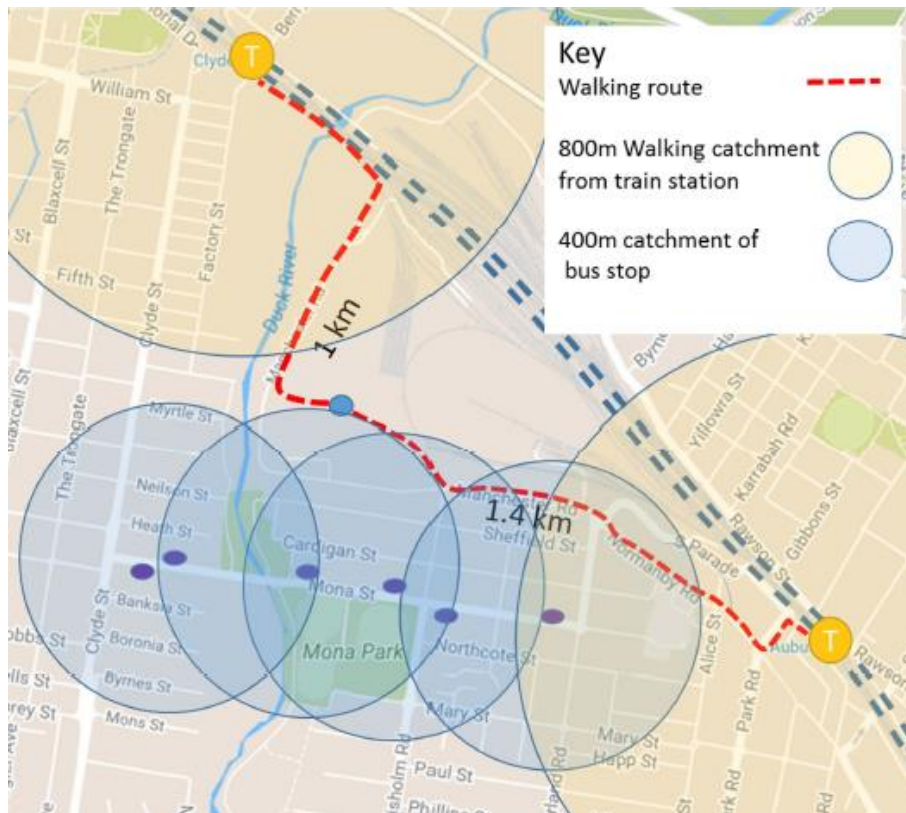


Figure 51. Train stations (source: Jacobs)

Clyde Station and Auburn Station are the closest rail stations to the Site. Both Stations are within walking distance of the site. Both stations are more than 800m from the majority of the site. The site is within a walkable distance to either Clyde Station or Auburn Station requiring a 15 to 20-minute walk.

In relation to these stations, the TIA notes the following:

**Clyde Station** is about 1km walking distance from the centroid of the site. There is a public walkway that runs parallel to the railway line and provides walking access between the site and the station and a crossing of the Duck River. There are currently up to 11 services per hour that stop in the peak hour. A new timetable was adopted in November 2017. The changes to services included:

- T1 Western Line services remained the same westbound (peak of 4 per hour)
- T1 North Shore services were removed eastbound (peak of 5 per hour dropped)
- T2 Inner West Services were added (peak of 8 per hour added)
- Carlingford Line will be discontinued (peak of 2 services per hour dropped) when Parramatta Light Rail construction commences

**Auburn Station** is approximately 1.4km walking distance from the centroid of the site with access along public footpaths. There are approximately 18 services stopping at Auburn Station per hour. The peak stopping pattern in the evening peak is:

- T1 line Eastbound (4 per hour)
- T1 Line Westbound (4 per hour)
- T2 Inner West Line Eastbound (4 per hour)
- T2 Inner West Line Westbound (6 per hour)



The Amended Proposal (including the proposed traffic measures) will improve access to these stations in order to reduce dependence on private vehicles. This will be achieved by providing links to existing pedestrian paths that lead to the local stations.

#### *Active Transport*

There are existing off-road cycle routes adjacent to the western side of Duck River. An extension of this shared path to the north has been identified within Council's Bike Plan. There are currently no other bicycle routes marked in the Bike Plan that connect the site to the nearest train stations. There are existing pedestrian connections to Auburn Station available along the existing road side footpaths.

There are new pedestrian connections available from the northern end of the site via RailCorp land to Clyde Station. These have been provided to allow easy access for workers at the Hub to Clyde Station.



Figure 52. One of the existing entrances to the pedestrian path to Clyde Station

#### *Shuttle Bus*

PAYCE are offering to provide a shuttle bus to operate between the Site and the Auburn Station. This would be a free shuttle bus that operate free of charge to users for the first 5 years of the development.

The TIA assesses the existing traffic and transport conditions, the proposed development and concludes that impacts on traffic and transport are acceptable subject to mitigation measures and intersection upgrades.



### ***Land Use Suitability***

A land use suitability review for the Proposal has been undertaken by TRACE Environmental (Attachment 7). In consideration of the proposed new land uses on the site, TRACE Environmental has reviewed the following environmental reports prepared for the site:

- *Remediation Action Plan*, Lot 12 DP1166540, Manchester Road, Auburn, NSW, prepared by E3Consulting Australia Pty Ltd, 9 July 2012
- *Report & Remedial Action Plan*, 300 Manchester Road, Auburn, NSW, prepared by JBS&G (VIC & SA Pty Ltd), 12 December 2013
- *Stage 1 Preliminary Site Investigation*, Lot 11 DP1166540, 300 Manchester Road, Auburn, NSW, prepared by DLA Environmental Services Pty Ltd, 2 July 2015
- *Land Use Suitability Review*, Lot 12 DP1166540, 300 Manchester Road, Auburn, NSW, prepared by DLA Environmental Services Pty Ltd, 2 July 2015

Based on a review of the above referenced environmental reports, and the requirements of SEPP No. 55 – Remediation of Land and the National Environment Protection (Assessment of Site Contamination) Amendment Measure (NEPM, 2013), TRACE Environmental concluded that the site can be made suitable for all land uses associated with the proposed redevelopment, including residential, childcare centres, public open space, footpaths, roadways, commercial land uses such as retail shops and offices.

A Remedial Action Plan (RAP) will be prepared for the site following any rezoning, outlining the requirements for remediation and validation of each stage of the proposed redevelopment, in accordance with the approved master plan.

### ***Stormwater & Flooding***

There are no flooding maps associated with the Auburn LEP 2010, the Site is not below the 1 in 100 year flood level and the Site is not known to be flood liable.

### ***Servicing and Survey Report***

A report regarding services on and to the Site has been provided by Northrop (Attachment 8). This report describes the services available on and to the Site, outlines easement constraints and assesses the capacity of the services.

There is an easement for electricity in the south-east corner of the Site, and various rights of way (of variable width) providing access around the perimeter of the Site to the railway lands, as detailed on the land survey by LTS Lockley. There is a stormwater pit and pipe network that collects and discharges the majority of stormwater flows generated across the Site. Currently, stormwater flows generated from Lot 11 drain to the west (towards Duck River), while surface flow from Lot 12 drains to the south (towards Manchester Road).

The western half of the Site is largely covered by buildings and concrete/paving with approximately 60% of the Site being impervious. The eastern portion of the Site comprises some 6ha of undeveloped and vacant land. In terms of stormwater, there are two overland paths traversing the Site. The proposed redevelopment, by provision of open space, leading public domain design and On-Site Detention (OSD) has the potential to significantly reduce runoff and improve water quality in accordance with Council requirements.

In terms of potable water, the Site is currently serviced by a water main owned by Sydney Water Corporation (SWC). This main runs along the southern side of Manchester Road (at the eastern end). A water main is also located directly opposite (on the northern side).

The existing water main is not expected to be large enough to service demand from the proposed development and therefore a larger water main will be required to supply water to the Site.

Water requirements for fire-fighting purposes (including pumps and dedicated on-Site water storage tanks) will be subject to confirmation through the design and detailed Authority consultation phase, including water meters to service various zones / buildings (as required).

The provision of water and sewer services (and the management of new development considering existing easements) can be managed through the Planning Proposal and direct engagement with Sydney Water.

There are gas services available to the Site (to the south in Manchester Road) and telecommunication services would be enabled for the proposed redevelopment.

There is sufficient capacity in the high-pressure main to service the Site. A direct connection to the DN350 high-pressure gas main will not be permissible.

A separate extension from the main will need to be provided to the Site, with a pressure reduction substation. Preliminary calculations indicate that a 1050 kPa main would be sufficient to secure the supply of natural gas to the new development. The final scope of works for natural gas supply will be subject to Jemena.

The Site currently accommodates a single sub-station owned by AusGrid. The substation is serviced directly by high-voltage feeder lines from the Lidcombe Zone Substation which is located approximately 2km from the subject development Site.

Preliminary load calculations indicate that the proposed development would require approximately eight (8) to ten (10), 1,000 kVA substations to service electricity for the Site. The ultimate number of substations will depend on the size of the substations installed across the Site.

It is expected new feeder lines will need to be extended from the Lidcombe Zone Substation to service the total demand for the proposed development. There are currently spare conduits in the HV feeder services trench, which potentially could be used to extend new feeder lines to the Site.

A formal application will need to be submitted to AusGrid to confirm sufficient capacity within the existing Lidcombe Zone Substation; the final infrastructure provisions to be made to service the proposed development; and removal of the existing on-Site sub-station. It is recommended future substations be placed above RL 6.2 m AHD, to avoid any possibility for inundation from the adjoining floodwaters.

## ***Has the Planning Proposal Adequately Addressed Any Social and Economic Effects?***

### ***Economic Impact Assessment***

SGS have undertaken a number of reports in support of the 2017 Proposal which have been previously submitted to Cumberland Council. SGS have prepared a new report in support of the 2018 Amended Proposal (Attachment 3).

The economic analysis of the Amended Proposal is a critical part of the strategic justification to rezone the site from purely industrial uses to a mixed use development.

This new report synthesises the previous SGS' analysis of the context, feasibility, economic impact, social impact and strategic justification for the Amended Proposal.

A significant component of this analysis is a high level feasibility analysis of the Amended Proposal with an alternative development scenario that allows for a development in line with the current planning controls. At its highest level, this is a relevant planning consideration in order to promote the *orderly and economic use and development of land* complemented by a strong alignment with current State Government Planning consistent with the objectives of the EPA& Act.

In this regard, the SGS work should be considered holistically and not from a stand -alone economic impact perspective. A summary of the relevant extracts of the SGS report are outlined below (**BOLD** our emphasis):

#### *Strategic and planning context*

*...The Greater Sydney Region Plan has identified the Greater Parramatta area to be of significant importance to emerging industries in the Sydney area. The subject site is located within a 'Review and Manage' region of the Central City District Plan, allowing for flexibility in the use of undeveloped industrial land. The Cumberland Draft Employment Lands Strategy aspires for Cumberland to provide jobs for higher order industries and provide space for emerging industries...*

*...Current development planned and under construction in Auburn is largely based upon existing industries and demands for warehousing, freight and logistics, and waste material recycling. **The Manchester Road site provides limited access to the motorway and major arterial network, limiting its role supporting future freight and logistics operations that may seek a site of this scale. It does, however, provide opportunity for smaller-scale, local and emerging industries to move into an established area with good accessibility to a local workforce who skills align with this role. It also provides an opportunity for the precinct to support the growth of the Parramatta CBD and Greater Paramatta to Olympic Park (GPOP) corridor. ...***

#### *Cumberland LGA Profile*

*There has been strong growth in health services and education as well as Professional, Scientific and Technical Services, though a significant proportion of the available workforce does not have higher education qualifications past secondary school.*

***Growth in floorspace demand is strong for freight and logistics, local light industrial, light manufacturing, retail, and special and urban services, all of which are proposed for inclusion in the PAYCE development.***

#### Site feasibility

High level feasibility analysis compared PAYCE's proposed project case with an alternative scenario that builds the site out to full capacity under the current planning controls. **This analysis indicates that PAYCE's Project case delivers a feasible outcome (delivering a positive residual land value (RLV), of approximately \$38 million), while the Industrial build out case is marginally unfeasible, delivering a negative RLV, of around \$3.5 million.** Sensitivity testing of the modelling results suggests that the Industrial build out scenario may be marginally feasible using slightly different assumptions, such as lower construction costs or slightly higher rents per square metre for industrial space.

**However, the addition of acquisition costs for the site for another developer would add significant cost to the feasibility equation and likely further disincentivise the development of the site solely for industrial uses.**

#### Economic impacts

The highest rates of future growth in employment in the Cumberland LGA are expected in non-industrial sectors. However, industrial and urban services jobs are expected to make up a significant proportion of Cumberland's economy in 2036. Despite shifts towards other industries, there will still be demand for industrial floorspace in Cumberland to service projected jobs growth in this sector.

Both the Project case and Industrial build out scenario will deliver a significant increase in employment at the site. **Either scenario also has the potential to deliver a significant proportion of the Cumberland LGA's floorspace demand 25% and 40% of future industrial demand and 73% and 116% of urban Services demand.**

**The Project case is likely to generate a higher number of jobs and value-add in construction.**

#### Strategic assessment

The SGS Net Community Benefit Test (NCB) suggests that the **Project case is likely to deliver an increase in wider benefits** compared to both the base case and the alternative full industrial build out case. The Project case also meets more of the GSC's Directions and Objectives compared to the Industrial build out scenario.

In terms of the economic impact analysis, the Amended Proposal represents a superior outcome to the alternate scenarios. In this regard, relevant details of the SGS economic impact assessment are summarised below (**BOLD** our emphasis):

#### Demand for urban service and industrial land

- The highest rates of growth in employment in the Cumberland LGA are expected in non-industrial sectors. Manufacturing is forecast to grow to 2036.
- However, industrial and urban services jobs are expected to make up a significant proportion of Cumberland's economy. Though the forecasts suggest that there will be smaller increases in these sectors to 2036 compared to others, industrial related industries will account for around 33,000 jobs, and urban services, 26,000 jobs in 2036. This represents growth of 11% and 17% respectively from 2016 levels, and will account for 33% of total jobs in the LGA.
- Despite shifts towards other industries, there will still be demand for industrial floorspace in Cumberland to service expected jobs growth. Over 1 million square metres of additional employment floorspace will be required in the Cumberland LGA by 2036. Of

this growth, over 297,000 square metres will be needed for industrial-related uses. The key land use categories expected to accommodate this floorspace include freight and logistics, local light industrial, light manufacturing, and urban services.

#### *Employment floorspace potential at the site*

- Both the Project case and Industrial build out scenario will deliver a significant increase in employment at the site. Compared to the base case, **the Project case is expected to deliver a net increase of between 977 and 1,122 jobs (or between 1,955% and 2,224%) and an additional 300 commercial jobs.** The Industrial build out could deliver between 1,584 and 1,814 jobs (or an increase of between 3,168% and 3,628%).
- Either scenario has the potential to deliver a significant proportion of the Cumberland LGA's floorspace demand. **The Project case could deliver approximately 25% of the LGA's industrial floorspace demand, and 75% of urban services demand.**

#### *Job creation and value add*

- The Project case is likely to generate a higher number of jobs and value-add during construction. The Project case will deliver a higher number of jobs and create more Gross Value-Added than the full industrial scenario due to the greater complexity of residential versus industrial construction
- The Industrial build out case is likely to generate a higher number of jobs and value-add during construction. The Full industrial build-out will deliver a higher number of jobs and create more Gross Value-Added during operations compared to the PAYCE scenario. However, this, does not take into consideration the other social benefits that the PAYCE scheme will deliver.

Based on the above analysis, not only does the scheme lead to significant economic benefits, it is demonstrated to be more feasible and economically superior to an hypothetical alternate scheme that maintained a full industrial uses under the current industrial zoning.

#### ***Retail Impact Assessment***

One of the key features of the 2017 Proposal was the introduction of a new local centre. This was supported by an Economic Impact Assessment of the proposed retail uses undertaken Leyshon Consulting.

This assessment examined the existing local retail facilities, noting there are almost no retail facilities within the defined trade area at present. Leyshon's analysis of these centres indicate there is currently a very low level of vacant floorspace, which suggests *prima facie* that existing centres are currently trading at acceptable levels.

The report concludes that these net community benefits will not be diminished by any adverse trading impacts given the proposal's modest impacts as identified in this assessment. In addition, the rapid population growth after 2021 on the site and within surrounding suburbs will increase available retail spending significantly to the benefit of all operating in the Auburn retail sector.

The Amended Proposal does not include a retail centre with retail limited to neighbourhood shops. Leyshon Consulting has prepared an amended report to support the Amended Proposal (Attachment 15).



## **Social Impact Assessment**

### *Social Impacts*

The *Social Impact Assessment* (SIA) prepared by SGS also includes a community and recreation facility assessment (Attachment 3). The Report identifies the need for the following facilities as a result of the Amended Proposal:

- demand for primary and secondary school places, though this would likely be able to be accommodated in existing schools
- demand for 1 to 2 child care centres, and potentially for a pre-school at the site, noting that child care centre could be included in the proposed commercial/retail component
- need for a community meeting place within the site, and there may also be demand for health facilities. A 1,000 square metre community centre is included in the proposal, which would satisfy this demand
- the expected provision of open space and recreation facilities as part of the proposal would likely satisfy the requirements under the guidelines

The provision of the proposed new open space, community and recreation facilities, will provide convenient access to services, an attractive living environment for residents of the new development, and encourage social interaction between residents. In addition, the facilities provide a new walkable focus of community life for residents in the existing 'host' community.

The location of the proposed site close to the Clyde and Auburn Railway stations will also provide the opportunity for the new facilities and services to be conveniently accessed by residents of adjacent areas on their way to or from the stations.

The Proposal includes 58 new affordable rental housing units which is generally consistent with the provisions of the *Cumberland Interim Affordable Housing Policy* which has identified a growing waiting time for social housing in the area. These additional dwellings will thus help alleviate pressures on existing social housing in the area.

The Report concludes that the social impacts and benefits of the Amended Proposal are as follows:

***The provision of new facilities as part of the development will deliver benefits for the existing community around the site. This will include access to services, employment opportunities, and improved public open space.***

***The Project case would provide a significant contribution to the Cumberland LGA's dwelling target under the Central City District Plan. The Project case is expected to deliver 1,150 new dwellings, a significant portion of the 9,350 dwellings target under the Plan. This will also include affordable housing, and helping to alleviate pressures on social housing and households experiencing housing stress in the Auburn area.***

***The development has the potential to deliver benefits and opportunities for both residents and those currently living in the Auburn area. This may include new employment opportunities within 30 minutes of where people live, access to new facilities, and opportunities for recreation and social engagement.***

## 8.4 Environmental Sustainability

Environmental Sustainability is a guiding principle in the development of the Masterplan and Landscape Masterplan. This principle carries through every aspect of the Planning Proposal both at a macro and micro level from the improvements to Duck River to building design and public domain, open space and increased areas for active public recreation.

The Amended Proposal incorporates a number of sustainability objectives, measures and initiatives to be further developed during the development of the Site. These objectives have also been adopted in PTW's Urban Design Report to inform the Masterplan and Landscape Masterplan.

The sustainability objectives and initiatives to be incorporated into the planning for the Site include:

- Energy Efficiency
- Indoor Environment Quality
- Water Management
- Sustainable Transport
- Sunlight and Daylight
- Waste Management
- Material Selection
- Land Use and Ecology
- Community and Liveability

Further, the sustainability initiatives evident in the Masterplan will also be incorporated into detailed development plans to reduce the impact on the environment, and enhance the quality of living for the precinct. These key areas have a common theme with the sustainability objectives:

Sustainability Initiative	Areas of future investigation for the Site
Energy Efficiency	<ul style="list-style-type: none"> <li>• Passive design to response to prevailing winds and Site conditions for optimal natural ventilation</li> <li>• HVAC systems for zoned air conditioning and energy efficient appliances</li> <li>• Investigation of solar photovoltaic cells, central domestic hot water systems</li> <li>• Integrated renewable energy generation, building integrated wind turbines</li> </ul>
Indoor Environment Quality	<ul style="list-style-type: none"> <li>• Thermal comfort through use of suitable building materials</li> <li>• Cross ventilation/ natural lighting in future building design</li> </ul>
Water Management	<ul style="list-style-type: none"> <li>• High rating fittings and fixtures throughout the development</li> <li>• Water recycling including rain water harvesting</li> <li>• Grey and Black Water recycling</li> <li>• Water Sensitive Urban Design through rain gardens, bio swales and tree gardens/pits to be integrated into the development</li> </ul>
Sustainable Transport	<ul style="list-style-type: none"> <li>• Consideration of electric car charging points for residents</li> <li>• Cyclist facilities for residents at end point destinations</li> </ul>
Waste Minimisation	<ul style="list-style-type: none"> <li>• Waste sortation for residents to enable recycling and organic waste stream to a communal compost system</li> </ul>
Materials Selection	<ul style="list-style-type: none"> <li>• Sustainable construction methods</li> </ul>

Sustainability Initiative	Areas of future investigation for the Site
	<ul style="list-style-type: none"> <li>Sustainable use of resources with low embodied CO<sub>2</sub>, regard to health impacts, suitable environmental accreditation and recycled content in future development</li> </ul>
Land Use and Ecology	<ul style="list-style-type: none"> <li>Masterplan that provides increased ecological value through the transformation of a former industrial land to providing parks and ovals, street landscaping and roof gardens</li> <li>Reducing the heat island effect through landscaping and increased vegetation and water features</li> </ul>
Community and Liveability	<ul style="list-style-type: none"> <li>Building a sense of community through communal gardens and facilities</li> <li>Community environmental education</li> <li>Innovative way finding for residents and visitors</li> </ul>

Table 10: Sustainability Initiatives (Source: Northrop)

Future detailed design stages of the development will explore integrating these sustainability principles including implementation strategies to be covered in the Site specific DCP for the Site.

## 8.5 Mapping

The Planning Proposal is accompanied by zoning, height and FSR maps, which have been prepared in accordance with the Planning Proposal guidelines and if approved will be consistent with the standard technical requirements for LEP maps:



Figure 53. Proposed Zoning Map (Source: PTW)

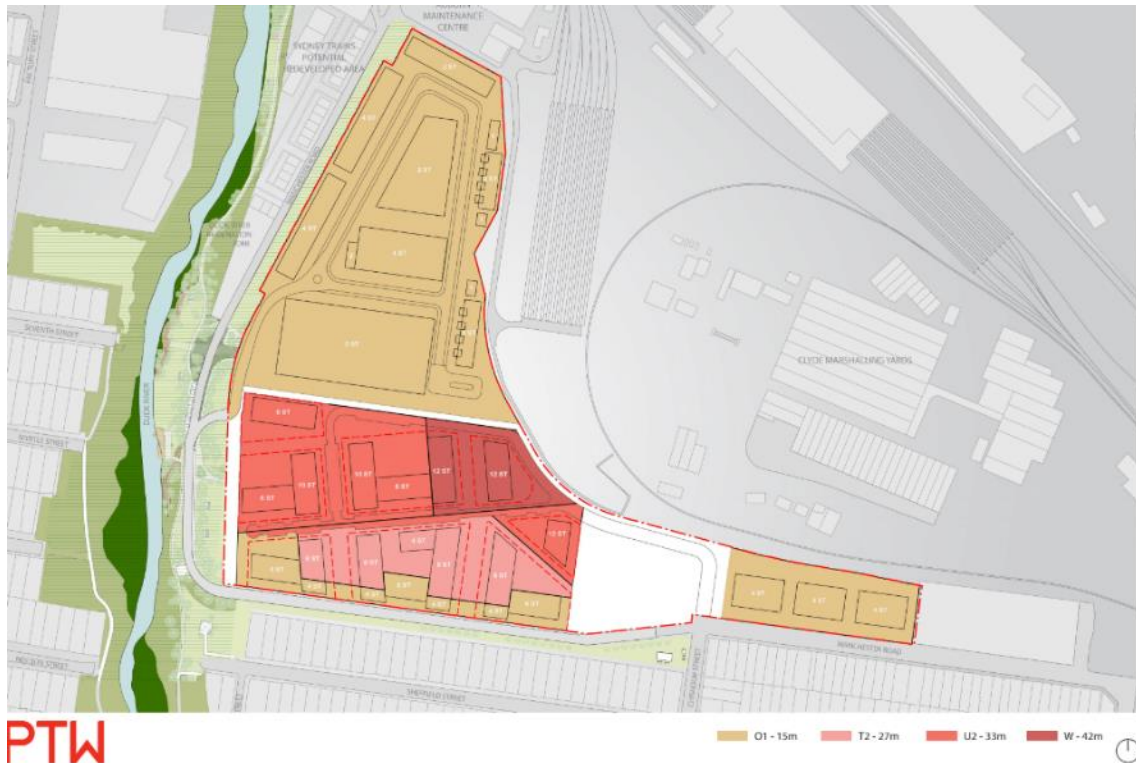


Figure 54. Proposed Height Map (Source: PTW)



Figure 55. Proposed FSR Map (Source: PTW)



## 9 Community consultation

PAYCE propose to work in collaboration with Council and the Cumberland community. Consultation will be supported by communications and information distribution, encouraging full community participation in the process. Community and stakeholder engagement are essential parts of successful and sustainable urban development.

PAYCE has built a reputation around engaging with local communities in the delivery of urban renewal projects, with recent projects in Melrose Park, Ermington, Wentworth Point, Riverwood and Victoria Park. Future community engagement for the Site will be based on the following principles:

- **Proactive**- Communicate with relevant stakeholders. Ensure they remain informed through the provision of timely, relevant and targeted information. Identify and report issues and special needs to build solutions into the program where possible
- **Inclusive** - Ensure all key stakeholders have easy access to the program to ensure there are 'no surprises' and they do not feel that they are being 'left in the dark'
- **Accessible** - The team will be accessible for the duration of the development of the project
- **Transparent and accountable** - Record, publish and make information publicly available. Ensure that stakeholders are provided with information on the decision-making processes during the delivery of the project
- **Responsive** - Respond in an effective manner to individual concerns. Ensure every reasonable effort is made to resolve issues to the satisfaction of all involved
- **Reliable** - Honour all commitments and be consistent in communication and interaction with communities and stakeholders
- **Organised** - Record engagement activities to ensure that all issues are properly dealt with and documented for future reference

### 9.1 Project Timeline

The proposed project timeframe for the completion of the Amended Proposal is dependent on the complexity of the project and the nature of any additional information that may be required by the Council and/or DP&E including the need for agency and community consultation.

PAYCE proposes to work in collaboration with Council, DP&E and other relevant agencies on a proposed project timeline which will include the following key milestones:

- anticipated commencement date (date of Gateway determination)
- anticipated timeframe for the completion of required technical information
- timeframe for government agency consultation (pre and post exhibition as required by Gateway determination)
- commencement and completion dates for formal public exhibition period
- dates for public hearing (if required)
- timeframe for consideration of submissions
- timeframe for the consideration of a Proposal post exhibition
- date of submission to the department to finalise the Local Environmental Plan (LEP)
- anticipated date Relevant Planning Authority (RPA) will make the plan (if delegated)
- anticipated date RPA will forward to the DP&E for notification.

## 10 Conclusion

This Amended Planning Proposal has been prepared pursuant to Section 3.33 of the *Environmental Planning and Assessment Act 1979* and in accordance with the provisions of the DP&E's - *A Guide to Preparing Planning Proposals October (2012)*.

The amended Proposal seeks to amend the *Auburn Local Environmental Plan 2010* as it relates to land at Manchester Road, Auburn (the Site). The primary purpose of the Planning Proposal is to rezone part of the Site from the *IN1 General Industrial* zone to a range of residential, business and open space zones to facilitate the urban renewal of the Site.

The Amended Proposal seeks more appropriate built form controls, seeking a new maximum height limit of up to 42 metres (12 storeys), a floorspace ratio of 1.5:1 on the southern 8.1ha of the site and removal of the minimum lot size controls for the site.

Key public benefits including the delivery of open space, upgrade of a section of the Duck River corridor and intersection upgrades, would be secured through a Voluntary Planning Agreement, in close consultation with the Council.

This Amended Proposal responds to government and community feedback. It also aligns with the *2018 Greater Sydney Region Plan and Central City District Plan*.

The Amended Proposal contemplates significant changes to the 2017 Planning Proposal and drastic changes from the 2015 proposal, namely a large reduction in the residential dwelling yield and the density and significant increase in the employment land component.

The Amended Proposal is a catalyst project, suitable to transition to a mix of innovative employment uses supported by improved amenity and public benefits that a contemporary workforce and new community demands. It is accompanied by a comprehensive range of specialist expert reports to support the proposed new planning regime for the Site.

These reports guide the Proposal to ensure it maximises the opportunities for benefits delivered with the Site, responds to its existing constraints as well as ensuring that the future use as a mixed-use precinct will have acceptable impacts on the environment, infrastructure and surrounding development/communities.