

114-120 Old
Pittwater Road
Brookvale

Planning Proposal

July 2020



Lewis Advisory
Strategy | Planning | Projects



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Executive Summary

This report has been prepared by Lewis Advisory in support of a planning proposal to amend the Warringah Local Environmental Plan 2011 (WLEP 2011). The report has been prepared on behalf of Primewest Funds Pty Ltd for their site at 114-120 Old Pittwater Road, Brookvale.

The site is zoned IN1 under the WLEP 2011 and is currently occupied by two industrial buildings and substantial ancillary office space. While there continues to be demand for warehousing and industrial uses on the site, evolving business practices means there is no longer demand for the quantum of ancillary office space. Under the current planning controls, the office space cannot be used independently of the industrial operations. This has meant most of the high quality office space has been vacant for some years. There has been interest in the occupation of the office premises by other businesses, however this has not been pursued given the planning limitations on the use.

The planning proposal is seeking an amendment to Schedule 1 of the WLEP 2011 to include office premises as an additional permitted use on site. The office premises would be restricted to the existing buildings and to a maximum of 15,657 sqm, which is the current quantum of space available at the two buildings. The planning proposal is not seeking to increase the amount of office space currently on site and will not permit the development of new office buildings. Should the site be redeveloped in the future, the additional permitted use clause could not be relied on.

This approach ensures that the industrial zoning of the site is protected in the long term, consistent with the Greater Sydney Regional Plan, North District Plan and the Northern Beaches' Local Strategic Planning Statement. Importantly, it will also provide flexibility and economic certainty over the short to medium term while the site transitions from traditional (niche manufacturing and wholesale services) to advanced manufacturing and innovative industries.

The specific objectives of this planning proposal are to:

- make the most efficient use of existing built form and site infrastructure in the short to medium term
- capitalise on the current employment potential of the site and ensure it can operate at its full economic capacity
- facilitate the transitioning of the site from traditional (niche manufacturing and wholesale services) to advanced manufacturing and innovative industries, and
- protect the current manufacturing operations on site as well as the longer term strategic value of the industrial zoned land.

The approach outlined in the planning proposal will ensure that the Schedule 1 amendments are wholly consistent with the relevant strategic plans that apply to the site:

- Objective 23 of the Greater Sydney Plan (*Industrial and urban services land is planned, retained and managed*)
- Planning Priority N11 and Action 46 of the North District Plan (*Retaining and Managing industrial and urban services land*)
- Priority 22 of Towards 2040 (*Jobs that match the skills and needs of the community*)
- Priority 24 of Towards 2040 (*Brookvale as an employment and innovation centre*)
- Priority 28 of Towards 2040 (*Safeguarded employment Lands*)



Legal opinion has been sought on the proposed approach to ensure that it is robust and to give Council comfort that the planning proposal can proceed. Importantly, the legal opinion confirms that the approach taken ensures consistency with relevant strategic planning documents and that the proposal does not set a precedent. It provides examples of similar approaches in other LEPs, including the Sydney LEP 2012 and Liverpool LEP 2008.

Because the planning proposal does not facilitate the intensification of existing approved uses on the site, it will not result in any adverse environmental impacts. The planning proposal will create substantial social and economic benefits, particularly for Brookvale and the surrounding communities. These benefits include:

- Continued economic use of existing valuable assets on the site.
- Catering to modern innovative businesses with support services in an industrial precinct which is transitioning from traditional manufacturing to advanced manufacturing and last mile delivery.
- Significant improvement in the range of employment opportunities that would be available to residents of Brookvale and surrounding areas.
- Creating around 1,373 additional jobs, both directly and indirectly and contributing to the employment targets for Brookvale as set out in the LSPS.
- Improving the choice of tenants looking for larger office space within Brookvale. The commercial core zoning within Brookvale is predominately controlled by one land owner currently (Westfield Warringah Mall) meaning commercial floorspace is limited.
- Reducing the need for local residents to travel further afield to their place of work (i.e. improved employment self sufficiency).
- Additional customer flows created through increased labour intensities which would increase retail spending within Brookvale, positively impacting on the existing retail facilities and making more efficient use of infrastructure in the precinct.
- Contributing to the overall growth of Brookvale in line with its planning designation in the North Sydney District Plan and the Towards 2040 - Local Strategic Planning Statement.

Specifically, the planning proposal demonstrates strategic and site specific merit in that it will:

- give effect to the relevant strategic plans through the protection of industrial land in the longer term and facilitation of economic activity and innovation within an identified strategic centre (Brookvale)
- reflect emerging trends and facilitate the transitioning of the site from traditional to advanced manufacturing and innovative industries
- not allow for the intensification of existing approved uses and will have no additional impacts on the natural environment
- capitalise on existing built form and not place any additional demands on infrastructure.

Given the strategic planning merit of the amendments, it is requested that Council forward this planning proposal to the Minister for Planning and Public Spaces for a 'Gateway Determination' in accordance with Section 3.34 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), with a view to the proposal being incorporated into a future tranche of fast tracked planning projects.



1 Introduction

This report has been prepared by Lewis Advisory in support of a planning proposal to amend the Warringah Local Environmental Plan 2011 (WLEP 2011). The report has been prepared on behalf of Primewest Funds Pty Ltd for their site at 114-120 Old Pittwater Road, Brookvale.

The site is currently occupied by two industrial buildings and substantial ancillary office space. While there continues to be demand for warehousing and industrial uses on the site, evolving business practices means there is no longer demand for the quantum of ancillary office space. Under the current planning controls, the office space cannot be used independently of the industrial operations. This has meant most of the office space has been vacant for some years.

The objective of this planning proposal is to amend Schedule 1 of the WLEP 2011 to include office premises as an additional permitted use on site. The office premises would be restricted to the existing buildings and to a maximum of 15,657 sqm, which is the current quantum of space available at the two buildings.

A previous planning proposal was lodged in April 2018, however was later withdrawn to enable key strategic planning documents to be finalised. These documents have now been finalised and it is the appropriate time to revisit the planning proposal.

The site and development history is outlined in **Sections 2 and 3** of this document. **Section 4** outlines the planning proposal, including the intended outcomes, an explanation of the proposed provisions and strategic justification. Additional relevant considerations are outlined in **Section 5**, including the recently released criteria for “fast tracked assessments” issued by the NSW Department of Planning, Industry and Environment.

This planning proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning & Assessment Act 1979* (EP&A Act), and *A Guide to Preparing Planning Proposals* prepared by the NSW Department of Planning, Industry and Environment.



2 The Site

2.1 Description

Street Address	114-120 Old Pittwater Road, Brookvale
Local Government Area	Northern Beaches
Lot/DP	Lots 1 and 3 DP 868761, Lot 3 DP 444776
Land Area	4.2 ha
Primary Frontage	Old Pittwater Road (approx. 120m)
Local Environmental Plan	Warringah Local Environmental Plan 2011
Zoning	IN1 General Industrial



Figure 1 Site Location
(credit: RPS)

2.2 Existing Development

Existing improvements on the site include two industrial developments located to the north (114 Old Pittwater Road) and south (120 Old Pittwater Road). A substation is located on the eastern boundary (Lot 3 DP 444776).



114 Old Pittwater Road shares access to Old Pittwater Road with 108 Old Pittwater Road. There is also direct access from Old Pittwater Road to the site near the southern boundary of no.120, which caters for heavy vehicles.

A breakdown of current uses and car parking is provided in the table below.

Table 1 Development Schedule

	114 Old Pittwater Road	120 Old Pittwater Road	Total
Warehouse (GFA sqm)	6,214	8,459	14,673
Ancillary Office (GFA sqm)	11,317	4,340	15,657
Parking	225	309	534

2.3 Local Context

The site is located within a commercial and industrial precinct. It is surrounded by IN1 General Industrial zoned land to the north, south and east and RE1 land to the west.

The adjoining lot to the north of the site (108 Old Pittwater Road) contains offices, warehouses and workshops of mixed industry. To the south, 122-126 Old Pittwater Road contains the Villeroy & Boch Factory Outlet. There are a mix of employment and business uses along Old Pittwater Road and Westfield Warringah Mall is to the east on Pittwater Road.

The rear of the site abuts heavily vegetated public reserve zoned RE1 Public Recreation. The residential suburb of Allambie Heights is further west of the site, consisting of R2 Low Density Residential zoned land with single and two-storey detached dwellings.

2.4 Access and Transport

The site is well served by high frequency and highly accessible buses on Pittwater Road, which run from 4.30am until 12.30am. Services are regular at 15 to 30-minute headways during the peak periods.

The bus network, including the B-Line, provides a high level of accessibility to the Sydney CBD and other local destinations, including Manly, Dee Why, Collaroy Plateau, Mona Vale, Bayview and Frenchs Forest.



3 Background & Context

3.1 Site history

There are a number of development consents that relate to the site, which has been progressively redeveloped since 1985 when Hanimex first occupied the site. The most recent buildings were approved in 1993 under Consent 93/48.

Until recently, Fujifilm (previously Hanimex) and Avon occupied most of the two buildings for their respective national headquarters. Given the nature of these businesses at the time of occupation, a significant component of ancillary office space was required to support their manufacturing operations.

In October 2015 Primewest was informed that both these major tenants were downscaling their operations. Since then, Fuji has been progressively downsizing and shifting their operations closer to Macquarie Park and Avon have left Australia entirely. This has left much of the site vacant.

For the last 5 years Primewest has been trying to lease the existing industrial buildings and ancillary office space with minimal success. They have been forced to lease the industrial space separately from the office space and approximately 2,000 sqm of office space has been sitting primarily vacant for the last 3 years. Fujifilm vacated in May 2020, bringing the vacant office space to 5,000 sqm.

3.2 Changing trends in industrial land use

Business practices are evolving and many companies are no longer looking to co locate their office headquarters and manufacturing operations. There is a preference to locate manufacturing closer to logistics infrastructure, with primary office space in locations closer to CBDs. This has been an ongoing trend affecting many of Sydney's inner employment lands and is something a number of Councils are currently trying to resolve.

Since the 1980s, there has been a gradual conversion of many metropolitan industrial areas to other uses (predominantly housing). The remaining industrial lands in the inner/built up areas are a vital employment and service centre for the surrounding residential catchments. These areas are evolving, with a transition from traditional (niche manufacturing and wholesale services) to advanced manufacturing and innovative industries. Much of the built form in these areas is high quality, however does not meet the needs of modern industrial tenants. While these areas transition, there is often an underutilisation of existing developments as planning controls are not sufficiently flexible to support this process.

3.3 Consultation and chronology of events

Primewest has been collaborating with Council officers on a resolution to this problem since 2015, as outlined in the chronology of events below. They have also met with the Greater Sydney Commission and made representation to the Northern Beaches elected Council.

October 2015

- Primewest informed their 2 major tenants, Fujifilm and Avon, are downscaling their operations.



-
- November 2015**
- Warringah Council commences stage 1 engagement of the Brookvale Structure Planning process. One of the issues to be considered as part of the study is the type of uses to be allowed in the West Brookvale Industrial area.
- December 2015**
- Primewest commission consultants to investigate repurposing of large vacant office tenancies on site.
- January - March 2016**
- Primewest engage and meet with Warringah Council senior planning officers. Council advise waiting to lodge a planning proposal to facilitate office premises until after the Draft Brookvale Structure Plan is advertised.
- April 2016**
- Primewest lodge submission during the stage2 engagement phase of Brookvale Structure Planning Process.
 - Council inform in writing that they expect draft structure plan to be exhibited second half of 2016.
- May - September 2016**
- In collaboration with Council planning officers, Primewest try to find simplest solution to re-purpose office facilities under existing LEP without success.
 - Council advise a planning proposal should not be lodged until after the Draft Structure Plan is presented to Council.
- October 2016**
- Council advise the draft Brookvale Structure Plan will go to Council in February /March 2017, however this is delayed until May 2017.
- August 2017**
- Brookvale Structure Plan is presented to Council for approval and endorsed. The Structure Plan recommends office and business uses for West Brookvale Industrial area which includes the subject site.
- November 2017**
- Council publicly advertise the draft Brookvale Structure Plan
 - Primewest lodge submission supporting Structure Plan and meet with Council to discuss way forward.
- April 2018**
- Primewest lodge a planning proposal with Northern Beaches Council (PEX2018/0004).
- May - June 2018**
- Council request Primewest withdraw the planning proposal until their Local Strategic Planning Statement is finalised.
 - Primewest meet with GSC to discuss options and are advised that Northern Beaches Council need to undertake further investigation to justify office uses in Brookvale.
 - Primewest withdraw the application.
- June 2018 – November 2019**
- Primewest monitors LSPS progress with regular interactions with Northern Beaches Council.
- November 2019**
- Primewest makes a submission on the draft LSPS.



February 2020

- Elected Council considers the LSPS. Primewest make representation to the Council requesting amendment to wording to help facilitate flexibility. Council adopts LSPS unchanged.

3.4 Previous Planning Proposal

A planning proposal was submitted for the site on 12 April 2018 (PEX2018/0004). The proposal was seeking an amendment to Schedule 1 of the WLEP 2011, however without the limitations on floor space included in this proposal.

On 21 May 2018, Council advised the applicant that the planning proposal could not be considered until such time as further strategic analysis of Council's industrial lands was undertaken following the release of the North District Plan. Council raised a number of considerations, which have been addressed in **Section 5** of this report:

- Consistency with the Greater Sydney Region Plan and the North District Plan and ensuring there is sufficient justification for any inconsistencies
- Demonstrating strategic merit or site specific merit
- Consistency with ministerial directions, and
- Ensuring the proposal adequately addresses likely impacts, particularly economic and traffic impact.

The applicant decided to withdraw the planning proposal until such time as Council had finalised additional strategic analysis (namely their Local Strategic Planning Statement).

3.5 Current Office Demand

As outlined in **Appendix A**, demand for office floorspace in the Northern Beaches Council is higher than the state benchmark, with core office generating industries experiencing significant growth in demand recently. This demand is also occurring in the Northern Beaches area.

Existing office floor space supply in Brookvale is limited when compared to that of other surrounding precincts. There is generally a low level of supply as compared with other parts of Northern Sydney. Relevantly, the size of the office space for lease in this area are all typically quite small at less than 500 sqm and would suit a limited range of users.

In addition, much of the land zoned for office premises in Brookvale is associated with the Westfield Shopping Centre and is therefore unavailable for other office tenants.

Primewest has been approached by a number of potential office tenants, including Pullinen Property Group (1,000 sqm), Fulton Hogan (3,000 sqm) and Zanerobe (600 sqm), however due to the planning limitations on office premises at the site these have not progressed.

3.6 COVID-19 and Priority Projects

Since the previous planning proposal was withdrawn, there has been an unprecedented economic and social crisis with the worldwide COVID-19 pandemic. The social and economic impacts associated with this ongoing event and the implications for the site are discussed in more detail in **Section 4.3.3**.



There is an acknowledgement from all tiers of Government that all efforts should be made to stimulate the economy. This has resulted in the State Government introducing a process for “fast tracking” proposals which fit specific criteria. This planning proposal has been considered in the context of these criteria (refer **Section 5.4**).



4 Planning Proposal

This planning proposal has been prepared in accordance with Section 3.33 of the EP&A Act and *A Guide to Preparing Planning Proposals* (NSW Department of Planning and Environment), which requires the following to be addressed:

- Part 1: objectives and intended outcomes of the amendment to the LEP (**Section 4.1**)
- Part 2: explanation of provisions (**Section 4.2**)
- Part 3: justification, including its relationship to strategic planning frameworks; environmental, social and economic impact and State and Commonwealth interests (Section 4.3)
- Part 4: mapping (**Section 4.4** and **Appendix C**), and
- Part 5: community consultation (**Section 4.5**).

4.1 Part 1: Objectives or Intended Outcomes

This planning proposal seeks to allow the *existing* “ancillary office space” on site to be used independently of the approved warehouse uses. The planning proposal is not seeking to increase the amount of office space currently on site and will not permit the development of new office buildings.

While there continues to be demand for the industrial floor space on site, there is no longer demand for all of the ancillary office space. The ancillary office space has therefore been vacant for several years. There has been interest in the occupation of the office premises by other businesses, however this has not been pursued given the planning limitations on the use.

The objectives of this planning proposal are to:

- Make the most efficient use of existing built form and site infrastructure in the short to medium term
- Capitalise on the current employment potential of the site and ensure it can operate at its full economic capacity,
- Facilitate the transitioning of the site from traditional (niche manufacturing and wholesale services) to advanced manufacturing and innovative industries, and
- Protect the current manufacturing operations on site as well as the longer term strategic value of the industrial zoned land.

The planning proposal will ensure the site can operate at its full economic capacity, without reducing the quantum of industrial land in the area. This will protect the site’s strategic employment and service role over the longer term.

Legal opinion from Holding Redlich has been obtained to ensure the planning proposal can achieve the objectives and intended outcomes (**Appendix B**). In particular, the legal opinion confirms that the proposed approach is legally robust, protects the IN1 zone in the long term and is consistent with the District Plan and Local Strategic Planning Statement. This is discussed further in **Section 5.1**.



4.2 Part 2: Explanation of Provisions

The provisions to be included in the proposed LEP are outlined below, in accordance with Section 3.33(2) of the EP&A Act.

Warringah Local Environmental Plan 2011

Name of Plan

This Plan is Warringah Local Environmental Plan 2011.

Aims of the Plan

This Plan aims to amend the *Warringah Local Environmental Plan 2011* as follows:

- Insert the following subclause in Warringah LEP 2011 Schedule 1 Additional permitted uses:

24 Use of certain land at 114-120 Old Pittwater Road, Brookvale

- (1) This clause applies to Lots 1 and 3 DP 868761 and Lot 3 DP 444776, 114-120 Old Pittwater Road, Brookvale identified as “Area 24” on the Additional Permitted Uses Map.*
 - (2) Use of that land identified as “Area 24” for office premises is permitted with development consent if the consent authority is satisfied that:*
 - (i) there will be no reduction in gross floor area available for industrial activities on any Lot,*
 - (ii) the development is carried out in an existing building, and*
 - (ii) no more than 11,317 sqm on Lot 1 DP 868761, and 4,340 sqm on Lot 3 DP 868761 and Lot 3 DP 444776 of existing gross floor area will be used for office premises.*
- Amend Warringah LEP 2011 Additional Permitted Uses Map Sheet APU_008A in accordance with the proposed additional permitted uses map (**Appendix C**).

Land to which Plan applies

This Plan applies to 114-120 Old Pittwater Road, Brookvale being Lot 1 and 3 in DP 868761 and Lot 3 DP 444776.



4.3 Part 3 - Justification

Part 3 of *A Guide to Preparing Planning Proposals* outlines ten questions to help justify the planning proposal. The planning proposal is justified based on the responses to these questions, as demonstrated in **Sections 4.3.1 – 4.3.4** below.

4.3.1 Section A: The Need for a Planning Proposal

Q1 – Is the planning proposal a result of any strategic study or report?

The proposal responds to a number of strategic planning documents prepared by local and State Governments. These are outlined in **Section 4.3.2**.

In addition, this planning proposal is accompanied by an economic needs and impact assessment (**Appendix A**), which demonstrates the economic need for the proposal.

Most significantly, the planning proposal is seeking to protect the long term integrity of the IN1 zone while also maximising the current economic potential of the site. These are fundamental themes in all relevant strategic planning documentation. The planning proposal is wholly consistent with the following relevant strategic plans that apply to the site:

- Objective 23 of the Greater Sydney Plan (*Industrial and urban services land is planned, retained and managed*)
- Planning Priority N11 and Action 46 of the North District Plan (*Retaining and Managing industrial and urban services land*)
- Priority 22 of Towards 2040 (*Jobs that match the skills and needs of the community*)
- Priority 24 of Towards 2040 (*Brookvale as an employment and innovation centre*)
- Priority 28 of Towards 2040 (*Safeguarded employment Lands*)

It is noted that Council is proposing to undertake additional investigations within the Brookvale industrial precinct to inform further amendments to the LEP and DCP. This further investigation is supported because, as demonstrated in this proposal, the nature of business activities on industrial lands is evolving and planning controls need to reflect current trends and demands. This sentiment is reflected in the Greater Sydney Plan which identifies at Objective 23 that the management of industrial lands should accommodate evolving business practices and changes in needs for urban services from the surrounding community and businesses.

This additional broader precinct based review should not impact the consideration of this planning proposal, which is necessary to solve an immediate problem at site and is consistent with existing strategic plans that apply.

The planning proposal will not impact the implementation of the other strategic planning investigations given that it will not change the existing zoning of the site and is limited to existing buildings on the site. If the site is ever redeveloped (resulting in the demolition of the existing buildings, then the amendments to Schedule 1 will no longer apply and could not be relied upon.



Q2 – Is the planning proposal the best means of achieving the intended outcome?

Yes.

The intended outcome of the planning proposal is to ensure the existing development on site realises its current employment and economic potential by creating additional jobs, while safeguarding existing employment lands.

In addition, it creates opportunity for innovation by allowing knowledge businesses and a broader diversity of jobs closer to home (strategy 23.1 – GSR Plan). It is a no-cost solution to providing additional employment generating floor space, without compromising the status quo.

To achieve this, the planning proposal is seeking an amendment to Schedule 1 of the LEP to enable the part of the existing buildings approved as ancillary office space to operate as standalone office space.

The planning proposal is clear that it only applies to the existing buildings on site and within the current GFA. It does not facilitate an expansion or intensification of office uses beyond what is already approved. If the site was comprehensively redeveloped and existing buildings demolished, standalone office premises would cease to be permissible.

There are two main alternatives to the current proposal:

1. Do nothing. The surplus office buildings remain largely vacant for the foreseeable future.
2. Redevelop the site. The existing buildings are demolished/substantially modified to cater for a permissible use.

Neither option is feasible or appropriate from a strategic planning or sustainability perspective.

Option 1 - the “do nothing” option does not represent the efficient use of existing built form and infrastructure and does not represent the economic and orderly use of land (refer **Section 5.2**). Further, it prevents an opportunity for employment generating businesses to relocate to the business park.

Option 2 - redeveloping the site is unnecessary, given the condition of the buildings and the fact that redevelopment would yield limited additional industrial floor space given the offices are multi-level over a relatively small footprint.

The approach set out in the planning proposal is considered the best means of achieving the outcome because it:

- ensures that the long term strategic value of the site for employment and urban services is retained
- makes the most efficient use of existing built form and infrastructure, allowing the economic potential of the site to be realised without substantial modifications
- is wholly consistent with the objects of the EP&A Act and in particular object (c); promoting the orderly and economic use and development of land
- is wholly consistent with the relevant strategic planning documentation, and
- provides an interim solution to a clearly articulated and site specific problem without setting a precedent for other employment land, including within the Brookvale industrial precinct.



4.3.2 Section B: Relationship with the Strategic Planning Framework

Q3 – Is the planning proposal consistent with the objectives and actions of the applicable regional, sub-regional or district plan or strategy (including any exhibited draft plans or strategies)?

Yes.

The following section outlines the consistency of the planning proposal with the relevant *Objectives* of the Greater Sydney Plan and *Planning Priorities* of the North District Plan.

The Greater Sydney Region Plan - A Metropolis of Three Cities

The planning proposal is consistent with the Greater Sydney Region Plan (GSR Plan). In particular, the planning proposal supports the following relevant objectives of the Plan:

- ***Objective 23 Industrial and urban services land is planned, retained and managed (Productivity)***

The GSR Plan identifies the approach to managing industrial and urban services land in the Eastern City as “Retain and Manage”. The GSR Plan provides further detail on this approach and includes the following statements of direct relevance to this proposal (p.133):

All existing industrial and urban services land should be safeguarded from competing pressures, especially residential and mixed-use zones.

The planning proposal is not seeking a change in zoning and will safeguard the site for industrial uses in the long term. The additional permitted use is for employment uses, not residential, and is restricted to the existing office space on site. If there is redevelopment of the site, the clause will no longer apply and could not be relied upon.

The GSR Plan also provides (p.133):

The management of these lands should accommodate evolving business practices and changes in needs for urban services from the surrounding community and businesses. There will be a need, from time to time, to review the list of appropriate activities within any precinct in consideration of evolving business practices and how they can be supported through permitted uses in local environmental plans.

The planning proposal is a direct response to the evolving business practices of the original tenants. There is no longer demand for the co-location of manufacturing and office headquarters at this location and therefore the requirement for ancillary office space has substantially reduced. This planning proposal outlines a mechanism to support business through a period of transition, with negligible impacts. It could also facilitate the attraction of a broader diversity of jobs and businesses (including, for example, knowledge businesses) close to home as businesses evolve.

The GSR Plan notes that in parts of Greater Sydney such as Lane Cove West, Mascot, Camperdown and Warriewood, office, industrial and urban services activities have been able to co-locate successfully. These precincts offer a broad range of urban services and jobs to the surrounding community. This can be done on the site without having any permanent impact to the current zoning of the land.



Brookvale is identified as a strategic centre within the GSR Plan. Strategic (and metropolitan) centres are to be the focus of employment within Greater Sydney. The planning proposal is consistent with this outcome and achieves the relevant objective (Objective 23) in the GSR Plan.

North District Plan

The planning proposal is consistent with the North District Plan (District Plan). In particular, the planning proposal supports the following Planning Priorities and Actions of the District Plan:

- **Planning Priority N11 Retaining and managing industrial and urban services land.**

The District Plan includes a range of actions to support this planning priority. Action 46 is directly relevant to this planning proposal:

Action 46: Retain and manage industrial and urban services land, in line with the principles for managing industrial and urban services land, in the identified local government areas [i.e. retain and manage] by safe-guarding all industrial zoned land from conversion to residential development, including conversion to mixed-use zonings. In updating local environmental plans, councils are to conduct a strategic review of industrial lands.

The planning proposal is not seeking to change the land use zoning and the industrial land will be safeguarded from conversion to residential or mixed use. The planning proposal will allow existing office buildings on site to be used independently of the manufacturing uses.

The planning proposal provides the opportunity for an innovative approach and will present opportunities for other office uses. It can facilitate the attraction of knowledge businesses and a broader diversity of jobs closer to home. This will not compromise the operation of existing industrial activities, nor will it weaken the current zoning of the site.

Q4 – Is the planning proposal consistent with a Council’s local strategy or other local strategic plan?

Yes.

The proposal is consistent with the following local strategies and plans:

- Northern Beaches’ Towards 2040: Local Strategic Planning Statement
- Shape 2028: Northern Beaches Community Strategic Plan
- Warringah Economic Development Plan 2011
- Warringah Employment Study 2013
- Draft Brookvale Structure Plan 2017 (noting this is proposed for review).

Each of these documents are discussed further below.

Northern Beaches’ Towards 2040: Local Strategic Planning Statement

Towards 2040 outlines a framework for growth in the Northern Beaches. Brookvale is identified as a strategic centre with a target/expectation of 3000-6000 additional jobs by 2040 – the highest growth in the LGA.

The following Priorities and actions are directly relevant to the planning proposal.

- **Priority 22 Jobs that match the skills and needs of the community**



One of the principles associated with this priority is to *maintain and increase employment floor space and ensure residential development within strategic and local centres does not diminish employment or economic opportunities (p. 158).*

The planning proposal maintains the existing employment floor space on site and is not proposing the introduction of non-employment uses. Rather than “diminishing’ employment or economic opportunities, the planning proposal seeks to maximise these employment opportunities. The current planning controls applying to the site are restricting the economic and employment potential of the site, as they only allow for ancillary office space to meet onsite demand. Allowing the surplus office space to be used as office premises for separate use provides an opportunity for that surplus space to provide a broader range of job opportunities closer to home for the LGA’s residents.

It is noted that a number of the specific actions associated with Priority 22 relate to the preparation of additional studies to inform the LEP and DCP provisions (**Actions 22.1 and 22.2**, p. 158). These studies may make further recommendations in relation to the site and surrounding area, however this is not considered a reason for the planning proposal not to proceed. Nothing in the planning proposal would impact on the outcomes of such studies being realised. This is because the planning proposal will be limited to the existing buildings on the site and still protects and maintains that surplus GFA for industrial uses if the increased demand for ancillary office premises arises in the future. In addition, if the site is redeveloped, it must be consistent with the zoning of the site, which means that the industrial zoning is protected for future industrial purposes.

Action 22.3 (p. 158) also outlines the intention to review planning controls to support specific industry sectors. This acknowledges that planning controls are sometimes inappropriate for a particular type of development or sector and that there needs to be a flexible approach in these circumstances to ensure economic growth. This planning proposal is consistent with this action.

- **Priority 24 Brookvale as an employment and innovation centre**

Brookvale is the Northern Beaches’ largest employment hub. It is also the most accessible centre in the LGA by public transport. It has a history of innovation, something that Council wants to foster in the future.

Two relevant principles are associated with this priority (p.167):

- (i) Support Brookvale as an employment-based centre, and*
- (ii) Preserve the industrial integrity of the industrially-zoned land.*

The planning proposal seeks to capitalise on the employment potential of the surplus GFA within the existing buildings on the site. It is not proposing the introduction of non-employment uses and it is not proposing out of centre development. It is supporting the function of Brookvale as an employment hub.

Flexibility is an essential ingredient in fostering innovation, and the planning proposal would assist in delivering Council’s vision for Brookvale. A rigid approach to planning for this site would stifle any innovation and economic potential of the site, and the Brookvale industrial precinct. This is particularly relevant noting that Towards 2040 notes that all industrial precincts in the Northern Beaches LGA are fully developed with no development in the pipeline (p. 180 of the LSPS).

The industrial integrity of the IN1 zoning will be preserved in the long term. Stand-alone offices will only be permissible on the site within the existing buildings and GFA. The



planning proposal does not facilitate an expansion of existing office space and new development for office use would be prohibited.

The planning proposal will assist with providing high-quality and industry appropriate commercial and industrial floor space, focussing on flexible division of floor space. This approach will support businesses, by providing flexibility in how space on the site is used and means that one large tenant is not required to take up all the space on the site (p.156). This means that the GFA can be shared between multiple businesses. In short, there will be no loss of industrial land, and will supply additional office premises in an employment hub.

- **Priority 28 Safeguarded employment Lands**

It is noted that the Northern Beaches has the lowest amount of industrial land in Greater Sydney and the value of employment lands close to residential areas is increasing. There is increasing pressure in many parts of Greater Sydney to rezone land for non-employment uses. It is necessary that these lands are protected and managed appropriately.

Importantly, the LSPS states that *future planning must balance local needs, a transitioning economy and high-value industries* (p.180). Planning controls must be flexible to cater for the evolution and transitioning of businesses, such as those previously occupying this site. The ancillary office space on this site is a legacy of changing manufacturing practices. It is no longer needed or desired by industrial tenants. There is however, local demand for this high quality office space to be occupied independently from the manufacturing uses.

The planning proposal outlines a mechanism for this transition to occur, supporting an immediate local need while protecting the long term integrity of the IN1 zoning.

One of the critical principles associated with the action is to support efficient use of land and built form that responds to changes in technology and innovation (p. 183). The planning proposal is wholly consistent with this. It is facilitating the occupation of existing office space that will otherwise remain vacant. As identified above, it also could facilitate the attraction of knowledge businesses and a broader diversity of jobs close to home.

Actions 28.1 and **28.3** (p. 183) reference additional investigations proposed to inform the LEP and DCP. Specifically, a review of the draft Brookvale Structure Plan is proposed. This is important strategic work, however should not impact on the consideration of this planning proposal. This planning proposal is required to solve an immediate site specific problem related to existing GFA on the site. Any broader strategic planning changes to the site that may result from the additional investigations would not be impacted by this planning proposal, particularly given that in the event that the site is redeveloped and the existing buildings are demolished, the clause will no longer apply.

Shape 2028: Northern Beaches Community Strategic Plan

Shape 2028 is the community strategic roadmap for the Northern Beaches LGA. It outlines the community's vision and sets the future direction for the LGA. There are two community outcomes and associated goals and strategies directly relevant to this planning proposal.

- **Vibrant Local Economy**

Goal 13: Our businesses are well-connected and thrive in an environment that supports innovation and economic growth:

Strategy a: Ensure that employment lands are retained and cater for a diverse range of businesses and industry and



Strategy d: Support business and professional networks that are responsive to the evolving needs of the business community.

The planning proposal is entirely consistent with these goals and strategies. It will not result in a loss of employment land and will enable the use of surplus existing GFA on the site to maximise its employment generating potential. The planning proposal is a direct response to the evolving needs of business.

Goal 15 Our centres attract a diverse range of businesses, providing opportunities for work, education, leisure and social life:

Strategy a Promote Northern Beaches as an attractive place to establish a business

Flexibility is an important consideration for businesses seeking to establish in the Northern Beaches. Businesses are constantly evolving and dynamic and it is important that the planning system can adequately respond to this. This planning proposal demonstrates an amendment to the planning controls can be made without any additional impacts and would illustrate Council's commitment to this goal and strategy.

- **Environmental Sustainability**

There is a key theme of sustainability throughout this document, which is a relevant consideration for the planning proposal. It is clear that this is an important topic for the Northern Beaches community. The planning proposal aligns entirely with the community outcome of Environmental Sustainability, by making the most efficient use of existing built form and infrastructure, without any additional environmental impacts. It will also allow for complementary land uses and employment opportunities for residents within the Northern Beaches LGA, reducing the need to travel long distances to access a broad range of job opportunities (Strategy 23.1 GSR Plan).

The Warringah Economic Development Plan 2011

The Warringah Economic Development Plan 2011 (WEDP 2011) provides the framework and direction for economic development within Warringah. While the WEDP 2011 is almost 10 years old and is being progressively superseded with more recent planning, it is relevant to consider some of its objectives and high level themes.

- **Objective: Create an environment that is conducive to business investment and industry development and attraction**
- **Objective: Encourage sustainable and innovative business practices**
- **Theme 1: Growing Employment Opportunities**

The planning proposal is entirely consistent with these objectives and themes. It demonstrates how flexibility in the planning system can help in achieving economic outcomes and encouraging employment diversity and innovation.

Draft Brookvale Structure Plan

The Draft Brookvale Structure Plan was exhibited in 2017. Subsequently, the Greater Sydney Plan and North District Plan were finalised. While the Brookvale Structure Plan had identified opportunities for diversification of the existing employment lands, the Greater Sydney and North District Plans placed a greater emphasis on protecting industrial land. Council has identified a need to undertake additional investigations before the Structure Plan is revised and re-exhibited in 2020.



Given that the planning proposal is consistent with these strategic plans, it is considered that the planning proposal will be consistent with any revised Brookvale Structure Plan.

4.3.2.1 Strategic Merit Test

A Guide to Preparing Planning Proposals requires a planning proposal to meet the Strategic Merit Test. Part 3 of the guide establishes assessment criteria for determining if planning proposals have strategic merit. These are addressed below.

Table 2 Strategic Merit Test

Criteria	Discussion
a) Does the proposal have strategic merit? Will it:	
<ul style="list-style-type: none"> give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; OR 	<p>Yes. The planning proposal is consistent with relevant strategic planning documentation. Refer Section 4.3.2 for detail.</p>
<ul style="list-style-type: none"> give effect to a relevant local strategic planning statement or strategy that has been endorsed by the Department or required as part of a regional or district plan or local strategic planning statement; OR 	<p>Yes. The planning proposal is consistent with the Northern Beaches LSPS. Refer Section 4.3.2 for further detail.</p>
<ul style="list-style-type: none"> respond to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing strategic plans. 	<p>Yes. Market trends and business practices have evolved since the current development was approved. Existing strategic plans (appropriately) focus on the protection of employment lands. The Greater Sydney Plan also acknowledges that there is a need to cater for evolving business practices in precincts. It specifically states there is a need to review permitted uses and amend LEPs if necessary. The planning proposal is responding to changes in business practices that have occurred since the original development application was approved. It is not seeking to change the zone of the land, thereby protecting the industrial zoning of the site. The additional permitted use is proposed only in association with existing buildings, and within existing GFA.</p>



Criteria	Discussion
b) Does the proposal have site-specific merit, having regard to the following?	
<ul style="list-style-type: none"> the natural environment (including known significant environmental values, resources or hazards) AND 	<p>Yes.</p> <p>The planning proposal will not result in an intensification of approved uses or development and will have no additional impacts on the natural environment.</p>
<ul style="list-style-type: none"> the existing uses, approved uses, and likely future uses of land in the vicinity of the proposal AND 	<p>Yes.</p> <p>No change in land use is proposed and there will be no change in the context of existing, approved or future land uses in the vicinity.</p> <p>The current development consent permits office uses ancillary to the approved manufacturing use. The proposal is not intensifying the approved office use, only changing how it is occupied.</p> <p>The land will remain as a strategic, industrial landholding.</p>
<ul style="list-style-type: none"> the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision. 	<p>Yes.</p> <p>The planning proposal will not result in a change to existing infrastructure or services demand. It does not propose an intensification or change to existing approved uses.</p>

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

Yes.

The planning proposal is consistent with the following relevant SEPPs:

- SEPP No. 55 Remediation of Land**

The site is currently developed for warehouses and ancillary offices. The planning proposal does not propose a change in the zoning of the land and will not facilitate the development of office premises beyond what is already on site. It will only allow for the existing office space to be occupied independently from the warehouse uses. A Stage 1 Preliminary Site Contamination Investigation is not necessary.

- SEPP (Infrastructure) 2007**

The planning proposal is not proposing an intensification of existing employment uses on site and traffic impacts will be negligible. Consultation with TfNSW will occur during statutory exhibition of the planning proposal.



Q6 – Is the planning proposal consistent with applicable Ministerial Directions (s9.1 directions)?

Yes.

An assessment of the planning proposal against applicable section 9.1 Directions is set out in **Appendix D**. In particular, the proposal is wholly consistent with Ministerial Direction 1.1 Business and Industrial Zones, which states a planning proposal must:

(a) give effect to the objectives of this direction

The planning proposal is consistent with the objectives of the direction because it will:

- Encourage employment in an identified strategic employment centre (Brookvale) and will support its viability as an employment hub in the Northern Beaches.
- Protect the industrial zone of the site, which will not change

(b) retain the areas and locations of existing business and industrial zones

There will be no change to the existing area, location or extent of the industrial zone.

(c) not reduce the total potential floor space area for employment uses and related public services in business zones

There will be no change in potential floor space area for employment uses.

(d) not reduce the total potential floor space area for industrial uses in industrial zones, and

The planning proposal is seeking amendments that would allow existing ancillary office space to be occupied independently of the manufacturing uses. This would only be permitted within existing buildings and current GFAs. The proposed amendment specifically states that no reduction in GFA for industrial uses may occur. If the site is redeveloped in the future, the amendment would cease to apply.

(e) ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment

Not applicable.

4.3.3 Section C: Environmental, Social and Economic Impacts

Q7 – Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

No.

The planning proposal will not result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats. While the rear of the site contains native vegetation and is identified as a wildlife corridor in the Warringah Development Control Plan 2011, the planning proposal is not seeking an intensification of activity or additional development the site.



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

There will be no intensification of existing approved uses on the site. The proposal simply enables existing, approved office space to be occupied independently of the manufacturing uses on the site. There will therefore be negligible additional environmental impacts as a result of the planning proposal.

In particular, there will be negligible additional traffic and parking impacts associated with the planning proposal. In any case, it is important to consider:

- There is a considerable supply of parking on site, which exceeds the minimum requirements for existing and proposed uses as outlined in the Warringah DCP 2011 and is currently underutilised.
- The site is well serviced by public transport.
- Existing loading and waste collection arrangements are adequate to cater for future office tenants.

Improvements to the current traffic and parking situation could also be addressed as part of the future development application(s), which could require the provision of various measures (such as implementation of a Green Travel Plan) to reduce reliance on car travel.

Q9 – Has the planning proposal adequately addressed any social and economic impacts?

Yes.

The Economic Needs and Impact Assessment (**Appendix A**) outlines the substantial economic and associated social benefits of the proposal, particularly for Brookvale and the surrounding communities. These benefits include:

- Continued economic use of existing valuable assets on the site, being modern office buildings.
- Catering to modern innovative businesses with support services in an industrial precinct which is transitioning from traditional manufacturing to advanced manufacturing and last mile delivery.
- Significant improvement in the range of employment opportunities that would be available to residents of Brookvale and surrounding areas. In total, some 1,373 additional jobs are likely to be created both directly and indirectly due to the planning proposal.
- Assisting the Northern Beaches LGA to achieve the employment targets for Brookvale as set out in the LSPS. It is important to note that these additional jobs will result from no change in floorspace (GLA).
- Improving the choice of tenants looking for larger office space within Brookvale. The commercial core zoning within Brookvale is predominately controlled by one land owner currently (Westfield Warringah Mall) meaning commercial floorspace is limited.
- Reducing the need for local residents to travel further afield to their place of work (i.e. improved employment self sufficiency).
- Additional customer flows created through increased labour intensities which would increase retail spending within Brookvale, positively impacting on the existing retail facilities and make more efficient use of infrastructure in the precinct.
- Contributing to the overall growth of Brookvale in line with its planning designation in the North Sydney District Plan and the Towards 2040 - Local Strategic Planning Statement.



Importantly, the planning proposal will provide these substantial benefits with negligible additional impacts on the local community. There will be no construction required and no intensification of approved uses.

4.3.4 Section D: State and Commonwealth Interests

Q10 – Is there adequate public infrastructure for the planning proposal?

Yes.

The planning proposal will not result in additional infrastructure demand. It is not seeking a change of land use and will not facilitate an intensification of development on the site. The site is adequately serviced by all necessary infrastructure, including access to public transport.

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

Consultation with relevant State and Commonwealth authorities would be undertaken in accordance with the Gateway Determination.



4.4 Part 4: Mapping

This planning proposal seeks to amend the following map of WLEP 2011:

- Additional Permitted Uses Map APU_008A

The proposed map is included in **Appendix C**.

4.5 Part 5: Community Consultation

Community consultation will be conducted in accordance with Schedule 1 of the EP&A Act and *A Guide to Preparing Planning Proposals*.



5 Additional Considerations

5.1 Legal Opinion

In order to provide reassurance that the planning proposal was consistent with the relevant strategic planning documents and would not have unintended consequences more broadly, a legal review was undertaken by Holding Redlich (**Appendix B**). Their advice considered the following questions:

- **Does the proposed wording of the Schedule 1 amendment ensure protection of the IN1 zone in the long term?**

Response: *The drafting of the proposed clause, combined with clearly defining the area of the site that is currently occupied by the existing building, will provide a robust approach which will achieve the Intended Outcomes and, in particular, ensure consistency with the District Plan and LSPS by protecting the IN1 zone in the long term.*

This is because:

- (a) the Proposed Clause makes it clear that the use is limited to only a specific area and within an existing building. As such, the clause could not be relied upon for any proposed new buildings; and*
- (b) the clause requires any proponent to satisfy Council (and for Council to be satisfied) that the requirements of the clause have been met before development consent will be granted (and, in fact, can be granted). As is clear from clause (2) of the Proposed Clause, this includes Council being satisfied that there will be no reduction in GFA available for industrial uses and that the development is being carried out within an existing building.*

Their advice also provides examples from other LGAs where:

- similar wording has been used in Schedule 1, including Sydney LEP 2012, Auburn LEP 2010 and Leichhardt LEP 2013, and
- additional permitted uses in Schedule 1 are restricted to existing buildings, including Liverpool LEP 2008, Blue Mountains LEP 2005 and Byron LEP 1988.

This advice demonstrates that the proposed approach is sound and can be relied upon by Council to achieve the intended outcomes of the planning proposal.

- **Will the Planning Proposal create a precedent?**

During discussions with Council earlier in 2020, there was a question raised regarding the potential for this planning proposal to set a precedent given the LSPS has only recently been adopted. Holding Redlich have advised that a precedent for a range of reasons, but primarily because:

- *It is not a development application, which is assessed against specified planning controls, rather it is a Planning Proposal specific and unique to the site. Council is required to consider whether there is merit and whether it is consistent with the various strategic plans that it has for the site, the Precinct and the LGA before agreeing to progress the Planning Proposal. The only avenue of review is through the Pre-Gateway Review process where any proposal will need to meet both the Strategic Merit Test and the Site Specific Merit Test in order to proceed to Gateway.*



5.2 Consistency with the Objects of the EP&A Act

Section 1.3 Of the EP&A Act outlines the objects of the Act. Objects (b) and (c) are important considerations in the assessment of this planning proposal:

(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment

(c) to promote the orderly and economic use and development of land.

Alternatives to the planning proposal include the “do nothing” option and the comprehensive redevelopment of the site. Neither of these options are consistent with Objects (b) and (c) of the EP&A Act. The “do nothing” option would result in an inefficient use of existing built form and infrastructure on the site and would not represent the optimum use of the land from an economic perspective. Redevelopment of the site to replace the ancillary office space with another permissible use is unnecessary, would not facilitate ecologically sustainable development and would be of little benefit from an economic perspective. The current buildings are in good condition and could readily be occupied by new businesses should this planning proposal proceed. Redevelopment of the office space is also unlikely to result in a significant increase in industrial floor area given the office space occupies a number of levels over a relatively small footprint.

The planning proposal is considered the only option that is wholly consistent with the Objects of the EP&A Act.

5.3 Consistency with the Warringah LEP 2011

The relevant aims of the Warringah LEP 2011 specific to this Proposal are as follows:

(b) to recognise the role of Dee Why and Brookvale as the major centres and employment areas for the subregion

(e) in relation to non-residential development, to:

(ii) maintain a diversity of employment, services, cultural and recreational facilities

The planning proposal is consistent with the aims of the Warringah LEP 2011 as it will:

- Reinforces and support the role of Brookvale as a strategic employment centre, ensuring its economic and employment potential can be realised and that strategically important employment lands are protected in the longer term.
- Encourage a diverse mix of employment opportunities and foster innovation, through the provision of unique and flexible employment space.

Under Warringah LEP 2011, the site is zoned IN1 General Industrial. The objectives of the zone are:

- *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 enable other land uses that provide facilities or services to meet the day to day needs of workers in the area;*
- *To enable a range of compatible community and leisure uses; and*
- *To maintain the industrial character of the land in landscaped settings.*



The IN1 zone does not permit office premises. The existing office premises on site were approved as ancillary to the warehouses uses. The planning proposal is seeking to allow the ancillary office space to be occupied independently of the warehouse uses. This is considered consistent with the aims of the IN1 zone, primarily because it:

- facilitates flexibility and will enable a wide range of land uses
- ensures the site can realise its current employment capacity, and
- does not impact the integrity of the IN1 zone, will not result in a reduction of industrial GFA on site and will protect the industrial zoning in the long term.

5.4 Priority Projects Criteria

To support the recovery of the NSW economy during and after the COVID-19 pandemic, the NSW government have developed criteria to prioritise the assessment of planning projects. This planning proposal is consistent with these criteria, as outlined below:

- **Jobs**

The proposal would create an additional 1,373 jobs¹ on site, with no additional impacts.

- **Timing**

Once the planning proposal is approved, development applications could be lodged almost immediately. There is existing demand for the office space that could be capitalised on as soon as the planning controls are finalised.

There is negligible capital investment required to realise the additional jobs on site, because the existing office space is of high quality and would need only minor fit out works to cater for future tenants. There are no major site constraints, and with no construction works required, development applications could be assessed and determined quickly.

- **Public benefits**

The proposal will have substantial social and economic benefits, which are clearly articulated in section 4.4.3 and **Appendix A**.

¹assuming ancillary office space remains vacant



6 Conclusion

The planning proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Act 1979* (EP&A Act) and addresses the requirements of ‘A Guide to Preparing Planning Proposals’ (Department of Planning, Industry and Environment, 2016).

The planning proposal provides a sound justification for the proposed amendments to Schedule 1 of the Warringah Local Environmental Plan 2011, to include office premises as an additional permitted use at 114-120 Old Pittwater Road, Brookvale.

Specifically, the planning proposal seeks to allow the *existing* “ancillary office space” on site to be used independently of the approved warehouse uses. It is not seeking to increase the amount of office space currently on site and will not permit the development of new office buildings.

The planning proposal will ensure the site can operate at its full economic capacity, without reducing the quantum of industrial land in the area. This will protect the site’s strategic employment and service role over the longer term.

Importantly, the planning proposal will achieve this through no intensification of uses on site and therefore negligible environmental impacts. It will result in substantial social and economic benefits for the local community, including the creation of local employment opportunities.

The planning proposal:

- is consistent with relevant strategic plans and policies
- is consistent with the relevant legislation, statutory plans and policies including the objects of the EP&A Act and the aims of WLEP 2011
- demonstrates strategic and site specific merit and
- will result in no adverse environmental, economic or social impacts

Given the strategic planning merit of the amendments, it is requested that Council forward this planning proposal to the Minister for Planning and Public Spaces for a ‘Gateway Determination’ in accordance with Section 3.34 of the EP&A Act, with a view to the proposal being incorporated into a future tranche of fast tracked planning projects.



Appendices



Appendix A Economic Needs and Impact Assessment prepared by Location IQ



**114 - 120 OLD PITTWATER RD,
BROOKVALE**

Economic Need and Impact Assessment

Prepared for Primewest
July 2020

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COVID-19 DISCLAIMER

COVID-19 is a respiratory illness caused by a new form of coronavirus. It was first reported in December 2019 in Wuhan City in China, with the virus able to be spread easily from person to person. The first Australian cases were recorded on 25 January 2020. As at 6th July 2020 there had been 8,449 confirmed cases of COVID-19 in Australia, however, 94 new cases recorded over the last 24-hour period.

Since the outbreak of COVID-19 in Australia, the Federal and State governments have taken a precautionary approach to implementing strategies to minimise disease transmission through strong border measures, social distancing legislation and communication activities.

Restrictions have been eased in recent weeks, as the rate of growth in cases has flattened and subsequently declined. However, each of the States and Territories will be easing restrictions at different rates, based on local conditions.

Unprecedented world events such as the COVID-19 pandemic will take time for the market to absorb and be reflected in the data used to assess its impact. As such, it is difficult to predict the scale and duration of its impact on the Australian economy, and more specifically, on the property market. On this basis, changes in market conditions as at the date of this report may not be reflected in the data and information.

Location IQ will continue to monitor the impact of the pandemic on the retail landscape, sales, and consumer preferences with a view to implementing findings in future reports and forecasts. The information and recommendations in this report are current as at the date of this report and (unless otherwise specifically stated) necessarily assume that the Australian economy and the subject asset(s) or site(s) to which the report relates, have not been significantly impacted by the COVID-19 pandemic. However, it is important to note that the COVID-19 pandemic is an important risk factor which must be taken into consideration when relying on the data and recommendations in this report.

Location IQ disclaims all liability and responsibility in respect of any loss suffered or incurred as a result of the COVID-19 pandemic materially impacting the findings of this report, but only to the extent that such impact is not reflected in the data and information used to support the recommendations.



EXECUTIVE SUMMARY

Key points to note regarding this independent need and impact assessment for the planning proposal at 114 - 120 Old Pittwater Road, include:

Brookvale Site

- i. Brookvale is located in the Northern Beaches of Sydney, approximately 16 km from the Central Business District (CBD). Brookvale forms part of the Northern Beaches Council Local Government Area (LGA) and has an extensive business community with a relatively large industrial area for this part of Sydney.
- ii. Brookvale is the LGA's largest employment hub, accommodating one third of the LGA's jobs.
- iii. Two buildings currently occupy the Primewest 114 – 120 Old Pittwater Road site across some 41,870 sq.m in area of which net lettable area accounts for some 29,579 sq.m. The site is zoned as IN1 General Industrial along with the surrounding sites. The transport links and infrastructure in Brookvale mean that the area is well-suited for employment generating floorspace.
- iv. The northern building is predominately occupied while the southern building is primarily vacant with unoccupied floorspace of 10,583 sq.m. The site is currently developed for warehouses and ancillary offices with this being a requirement of the zoning. The Brookvale buildings and design are not able to provide the flexibility for modern industrial users who require limited office floorspace as part of their operations. Consequently, the office space is vacant with little prospect for that space to be leased.
- v. Primewest are now seeking to allow the existing office premises on the site to be used independently of any warehouse/manufacturing type uses. The objective of the proposal is to make greater use of the substantial area of high quality, valuable space for standalone office purposes. Future tenants would operate within the existing buildings without the need for additional space or significant structural change on site.
- vi. This report, along with the planning proposal, seeks to detail the potential economic and public benefits of the proposed scheme. An outline of the industrial and office property market segments provides a review of the fundamentals which are highly relevant for the subject site.
- vii. There are two main alternatives to the current proposal:



- **Do nothing:** the office buildings remain significantly vacant for the foreseeable future.
 - **Redevelop the site:** the existing office buildings are demolished/substantially modified to cater for a permissible use.
- viii. These options are not considered to be feasible or appropriate from a strategic planning or sustainability perspective. Furthermore, these options are not commercially viable.

Industrial Market

- i. A number of changes within the industrial property sector have taken place recently as a result of changing technologies in the business place. These include logistics and e-commerce, which have changed the requirements for businesses traditionally locating in industrial properties. In particular, new modern industrial warehouses are larger both in size and height, contain clear space or column free environments with good access to a sub-regional population base critical for their attractiveness to tenants.
- ii. By comparison, small industrial precincts such as Brookvale are largely fully utilised with minimal land available for future development. These sites do not fulfill the attributes of modern industrial land user requirements detailed above.
- iii. Remaining industrial lands in built up areas, however, remain a vital employment and service centre for their surrounding residential catchments. This is particularly the case at Brookvale, which is a major industrial precinct serving the Northern Beaches of Sydney. The role and function of these precincts, however, is evolving with a transition from traditional (niche manufacturing and wholesale services) to advanced manufacturing and innovative industries currently underway.
- iv. While this transition occurs, there will be some repurposing of existing buildings or new development that needs to occur to meet the needs of new operators. This process, however, can take time and money.
- v. New users, such as advanced manufacturing and last mile delivery do not typically include large offices as part of the industrial uses.
- vi. The significant investment in buildings on the existing site which continue to have a strong economic value and use, are the catalyst for the planning proposal which seeks to make a greater use of the existing built form and avoid economic and environmental waste. The planning proposal allows existing viable buildings to be used while a transition occurs in the types of users at Brookvale. This economic friction is unavoidable in a rapidly changing global economy.
- vii. The planning proposal is consistent with these trends in which the Brookvale industrial precinct is well positioned to serve a greater role in meeting the needs of innovative industries, however, the transition

leads to some vacant space as this process occurs. It is economically vital to make use of this space as much as possible in the meantime.

- viii. The planning proposal does not change the long term underlying use of the land as industrial, with any future redevelopment of the site to be compliant with planning regulations relating to industrial use.

Office Market

- i. The Sydney office market is concentrated within major precincts such as the CBD, North Sydney, Macquarie Park and Parramatta. Vacancy levels are at historical lows and rents high in these precincts.
- ii. Although, there are pockets of commercial floorspace are located throughout suburban locations including the northern portion of Sydney, these precincts have traditionally been driven by the lower cost of office rents.
- iii. In recent times, changes in workforce trends, including working from home, work/life balance, access to a range of facilities such as childcare, shopping and the like, and long travel times, has driven greater employment self sufficiency (i.e. people being employed where they live).
- iv. In addition, the level of office vacancy in major office markets (CBD, North Sydney and Chatswood) has contracted recently. Given the uncertainty around the Covid-19 pandemic in Australia, it is too early to model office impacts. For this reason, this report does not assume any impact from Covid-19, but rather takes a long-term stabilised perspective on the demand for office floorspace.
- v. Improvements in infrastructure such as the development of the Metro rail network currently under construction will likely lead to greater demand for office floorspace at St Leonards, Crows Nest and North Sydney in the medium term.
- vi. Businesses such as Professional, Scientific and Technical Services form a major part of the Northern Beaches region employment with these industries generating demand for office floorspace. The Northern Beaches enjoys a comparative advantage for such services which are best placed to achieve innovations given the skilled requirements of staff within these businesses (matching the skills of surrounding residents).
- vii. The planning proposal seeks to allow space for innovative industries within the Brookvale precinct, co-locating with potential innovative industrial users and close to research precincts such as the Northern Beaches hospital, TAFE and sports precinct at SeaEagles Centre of Excellence.
- viii. All these factors together with access to a white collar workforce and provision of existing facilities means locations like Brookvale are becoming more attractive destinations for a range of office uses.

- ix. There has historically been a significant underinvestment in commercial office developments across the Northern Beaches. A review of current projects indicates that this underinvestment is likely to continue which will ultimately further increase the undersupply of office floorspace in the short to medium term.
- x. The overall level of commercial core zoned land at Brookvale is 17.1 ha which is significantly lower than that which is provided at Chatswood (30.3 ha) and Macquarie Park (75.3 ha). Furthermore, Scentre Group (the operator of Westfield Warringah Mall) control almost all the commercial core zoned land at Brookvale. As a result, the majority of commercial core land in Brookvale is not being used for commercial offices, meaning that the commercial land is a shopping centre precinct but not able to accommodate office uses which are being demanded in the area. The subject site could fulfil this role in the short to medium term.
- xi. The subject site provides large floorplate office space in an ideal location near existing infrastructure such as shopping centres and public transport to meet the needs of commercial users in the region. This will promote more efficient use of infrastructure.
- xii. Further, given the rapid increase in office rents, the subject site can provide cost-effective accommodation for larger office users, while having minimal, if any, implications for existing and proposed office developments.

Proposal Benefits

- i. It is important to note that a significant portion of the 114 - 120 Old Pittwater Road buildings are currently vacant. The landlord has been unable to fill this space with tenants which comply with the existing planning controls in the current physical configuration. As a result, a large portion of floorspace at 114 - 120 Old Pittwater Road is not contributing to the overall employment of the Brookvale precinct.
- ii. 1,373 jobs are likely to be created both directly and indirectly as a result of commercial offices being permitted on site. This assumes that all office floorspace at the subject site is occupied (15,657 sq.m).
- iii. The substantial positive benefits of the proposal include the following:
 - Continued economic use of existing valuable assets on the subject site, being modern office buildings.
 - Serving a greater role in meeting the needs of innovative industries. The transition may lead to some vacant space as the process occurs. This economic friction is unavoidable in a rapidly changing global economy.

- Assisting with the economic viability of the precinct with flexible planning options where friction can often be created (and vacant buildings eventuate) when significant changes are occurring in the industrial built form space.
 - Significant improvement in the range of employment opportunities that would be available to residents of Brookvale and surrounding areas. In total, some 1,373 additional jobs are likely to be created both directly and indirectly due to the planning proposal.
 - The planning proposal will assist the Northern Beaches in achieving the employment targets for Brookvale as set out in the *Towards 2040 - Local Strategic Planning Statement*. This involves accommodating some 3,000 - 6,000 additional jobs over the period to 2036. It is important to note that these additional jobs will result from no change in floorspace (GLA).
 - The proposed independent office use would improve the choice of tenants looking for larger office space within Brookvale. The commercial core zoning within Brookvale is predominately controlled by one land owner currently (Westfield Warringah Mall) meaning commercial floorspace is limited.
 - The planning proposal would also result in reducing the need for local residents to travel further afield to their place of work (i.e. improved employment self sufficiency).
 - The additional customer flows created through increased labour intensities would increase retail spending within Brookvale and would positively impact on the existing retail facilities and make more efficient use of infrastructure in the precinct.
 - The planning proposal would contribute to the overall growth of Brookvale in line with its planning designation in the North Sydney District Plan and the *Towards 2040 - Local Strategic Planning Statement*.
- iv. It is concluded that the combination of the substantial positive economic impacts will particularly benefit Brookvale and the surrounding communities. This report has not identified any adverse economic impacts associated with the planning proposal.

INTRODUCTION

This report presents an assessment of the need and demand for a commercial office to operate independently of any industrial or warehousing land uses at Brookvale on the Northern Beaches of Sydney. The report also considers the likely economic impacts that would result from the proposal. The subject site is referred to as 114 - 120 Old Pittwater Road throughout the remainder of this report.

Under the current planning controls, the office space cannot be used independently of the industrial operations. This has meant that much of the office space has been vacant for some years. The objective of the planning proposal is to amend Schedule 1 of the Warringah Local Environmental Plan (WLEP) 2011 to allow standalone office use of the office building sites (i.e. not associated with the industrial use).

This report is structured and presented in **four (4)** sections as follows:

- **Section 1** details the location of the 114 - 120 Old Pittwater Road site and discusses the context of the site within the Northern Beaches. The planning proposal is reviewed as well as the alternative options for the subject site.
- **Section 2** summarises key industrial land trends as well as providing a review of the industrial property market in Sydney.
- **Section 3** outlines the relevant office market while detailing the current demand and supply for office floorspace.
- **Section 4** outlines the conclusions of this report, including an assessment of the need for the planning proposal.



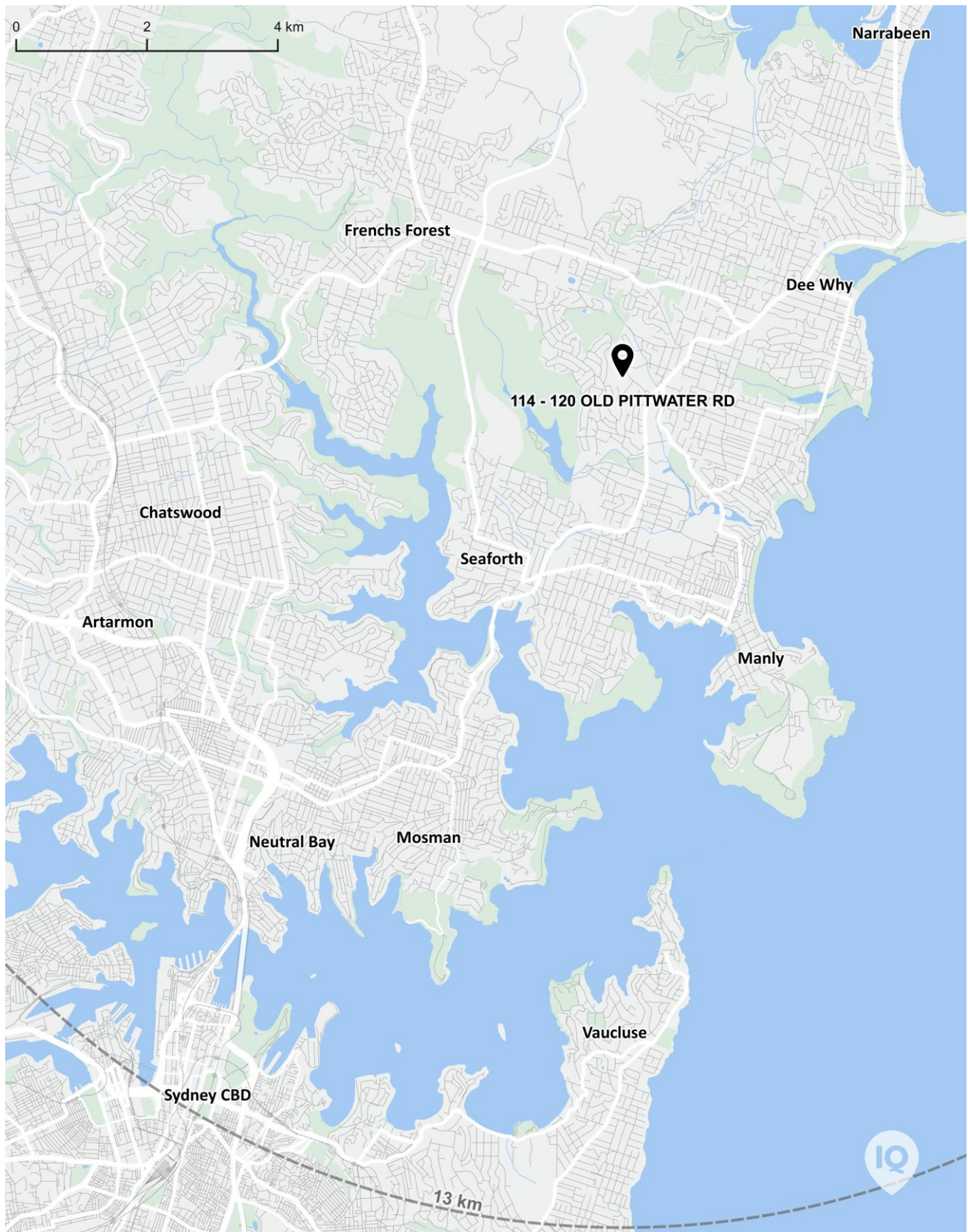
1 LOCATION AND PROPOSAL

This section of the report reviews the regional and local context of the Old Pittwater Road site in Brookvale and provides a summary of the proposed development scheme.

1.1. Regional and Local Context

- i. Brookvale is located in the Northern Beaches of Sydney, approximately 16 km from the Central Business District (CBD) (refer to Map 1.1). Brookvale forms part of the Northern Beaches Council Local Government Area (LGA). The Northern Beaches Council population is currently estimated at 273,400, and is projected to grow to 309,330 by 2036.
- ii. Brookvale has an extensive business community and contains a relatively large industrial area within this part of Sydney. Brookvale is the largest employment precinct in the LGA and accounts for one third of all jobs.
- iii. Two buildings currently occupy the Old Pittwater Road site (across a total land area of 4.2 ha). Map 1.2 illustrates the location of the subject site and surrounding uses. Key points to note include:
 - The site is zoned as IN1 General Industrial along with the surrounding sites.
 - Westfield Warringah Mall is situated approximately 800 metres to the east.
 - Low density residential is located to the west (past bushland).
- iv. There is limited vacant employment land within the Brookvale area for future development. Despite this, Brookvale is well-suited for commercial floorspace given:
 - Public transport including a number of busses which run along the nearby Pittwater Road (including the new B-line service).
 - Proximity to infrastructure within the surrounding area including the major provision of retail floorspace at Westfield Warringah Mall.
 - Proximity to surrounding residential areas which reduces the need for residents to travel to other commercial centres such as Chatswood or North Sydney.

MAP 1.1. 114 - 120 OLD PITTWATER ROAD REGIONAL CONTEXT



MAP 1.2. 114 - 120 OLD PITTWATER ROAD LOCAL CONTEXT

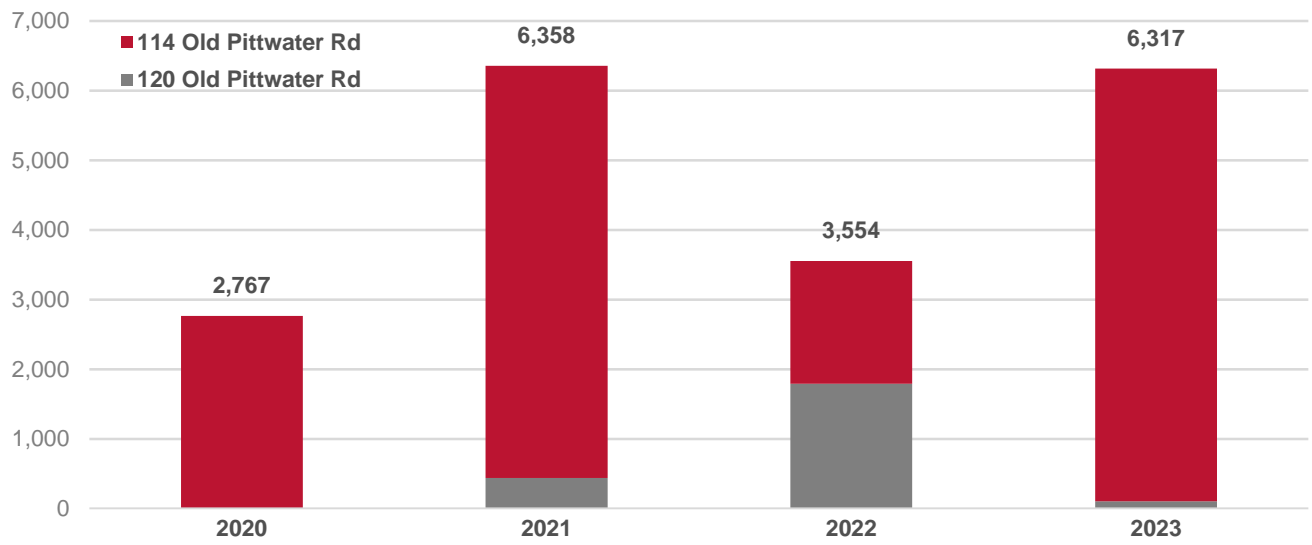


1.2. Existing and Proposed Premises

- i. The site is occupied by two buildings on the northern and southern portion of the site. Overall, the site is some 41,870 sq.m in area of which net lettable area accounts for some 29,579 sq.m.
- ii. The buildings were acquired by Primewest in 2012 and are supported by a total of 634 car spaces. This is a significant level of car parking for an industrial development.
- iii. Current tenants of the two buildings on site include:
 - Woolworths is the largest single tenant which currently occupies the third level of the northern building. Woolworths occupies 6,214 sq.m of space which is primarily used to fill online orders (i.e. a dark store).
 - James Bennett which specialises in print and digital wholesale services to libraries occupies 3,758 sq.m.
 - Other tenants on the property include Service New South Wales and Ozsale.
- iv. The northern building was fully occupied in April, although, camera maker Fujifilm recently vacated. The southern building is primarily vacant with unoccupied floorspace of 10,583 sq.m.
- v. Chart 1.1 details the current lease expiries by GLA at the subject site. This indicates that the majority of leases are due to expire in the short term (within the next three years). As a result, there is a greater likelihood of additional vacant floorspace to form part of the subject site in the future.
- vi. The tenants at the Old Pittwater Road site are generally similar to that of surrounding uses in the Brookvale industrial precinct. This includes businesses which require customer or supplier access to site (such as Service New South Wales). The Woolworths dark store is the exception which does not require customer visitation. Elsewhere in the Brookvale industrial precinct is a range of office/wholesale centres.
- vii. The subject site, with a large office component, suited previous tenants such as Fuji and Avon, which operated their head office with their main warehouse facility. There is now a lack of demand for office floorspace to be collocated with significant light industrial uses at Brookvale.
- viii. Despite the current lack of tenant demand for the office floorspace to be attached to the industrial use, the existing office buildings are in otherwise excellent condition. It would be economic waste to redevelop these buildings in the short to medium term, with a much more efficient economic outcome being a reuse of the buildings for office use only.

- ix. Primewest are now seeking to allow the existing office premises on the site to be used independently of any warehouse/manufacturing type uses. This simple, operational change would allow offices occupying the buildings to be provided without ancillary industrial warehouse usage.
- x. The planning proposal does not change the long term underlying use of the land as industrial, with any future redevelopment of the site to be compliant with planning regulations relating to industrial use.
- xi. Future tenants would operate within the existing buildings without the need for additional space or significant structural change on site.
- xii. The objective of the proposal is to make greater use of the substantial area of high quality space for standalone office purposes. The remainder of this report details the industrial and office market fundamentals as well as reviewing the potential employment generation along with other economic and public benefits of the proposal.
- xiii. There are two main alternatives to the current proposal:
 - **Do nothing:** the office buildings remain significantly vacant for the foreseeable future.
 - **Redevelop the site:** the existing office buildings are demolished/substantially modified to cater for a permissible use.
- xiv. These options are not considered to be feasible or appropriate from a strategic planning or sustainability perspective. Furthermore, these options are not commercially viable.

CHART 1.1. 114 – 120 OLD PITTWATER ROAD LEASE EXPIRY BY GLA



Source: Primewest



2 INDUSTRIAL LAND TRENDS

This section of the report reviews industrial land trends throughout Australia and Sydney generally, and how they are relevant for the planning proposal, given the sites zoning and existing built form.

2.1. Industrial Land Trends

- i. Industrial lands can be used for a number of purposes, including:
 - Heavy industry such as petrochemical plants.
 - Large factories/manufacturing/warehousing.
 - Light manufacturing and small factory/office/warehousing.
 - Research and development parks.
- ii. In Australia, over the past 30 – 40 years, there has been a gradual, yet evident decline in traditional industrial land uses within built up/metropolitan areas. These declines have been attributed to a number of factors, including increasing population pressures, lack of vacant land for residential development, rising property prices and urban consolidation policies of State Governments.
- iii. Consequently, traditional industrial activities are moving from inner city locations to larger and more affordable sites on the city fringe that have better road and rail infrastructure. These site characteristics include:
 - Larger and more affordable.
 - Superior road and rail transport which allow 24 hour access for heavy vehicles.
 - Situated closer to major population growth centres and a blue collar labour force.
- iv. As a consequence, a number of industrial land areas have declined in value as technological advances result in new facilities being built in terms of supply chain and distribution networks.
- v. Reflecting the above, a large proportion of land in major metropolitan areas have been converted from industrial to other uses (predominantly housing) since the 1980s.

- vi. Reflecting these trends, planning policies have rezoned large tracts of new industrial land in outer suburban areas. As inner city industrial land is eventually relocated to outer metropolitan locations, vacated inner city space over time will be converted to higher order uses.
- vii. Remaining industrial lands in inner/built up areas, however, are a vital employment and service centre for their surrounding residential catchments. This is particularly the case at Brookvale, which is a major industrial precinct serving the Northern Beaches of Sydney. The role and function of these precincts, however, is evolving with a transition from traditional (niche manufacturing and wholesale services) to advanced manufacturing and innovative industries.

2.2. Industrial Tenant Drivers

- i. A number of changes within the industrial property sector in relation to tenant requirements have also taken place recently as a result of changing technologies in the business place. These include logistics and e-commerce, which have changed the requirements for businesses traditionally locating in industrial properties.

E-Commerce

- i. Over the past five years, there has been a significant shift in the retail market from traditional bricks and mortar retail outlets towards more online based purchasing. Online retail purchases currently comprises approximately 10% of total retail purchases in Australia. This has led to a significant change in the composition of industrial properties within the Australian market generally, leading to more traditional bricks and mortar requiring a greater amount of warehouse space to fulfil online ordering. The majority of smaller retail goods purchased online are still served from traditional retail stores, however, larger goods such as whitegoods and other bulky items are served directly from warehouses.
- ii. This trend is changing, in that retailers are starting to serve customers who order smaller goods from warehouses as well. For example, supermarkets in Australia are starting to serve customers directly from their warehouses in the form of “dark supermarkets” which is a supermarket that customers do not have access to where staff members fulfil online orders. This is the case for the Old Pittwater Road site which currently accommodates a Woolworths dark store.
- iii. The fulfilling of online retail orders is location sensitive, with the distance of delivery a significant factor. Retailers who are potentially looking for warehouse/industrial floorspace would likely be looking for locations with access to substantial transport routes and the low cost of the industrial floorspace would be a large factor in determining exactly where to locate. These discretionary retailer warehouses need to serve larger sub-regions (typically 1-2 for the whole Sydney metropolitan area) as compared with a food and grocery retailers such as Woolworths serving smaller regions. Brookvale is not well placed to serve a larger sub-region for discretionary retailers.

Globalisation of logistics

- i. Logistics businesses in Australia have increased significantly in terms of their complexity and global reach, with a number of mergers and acquisitions by overseas logistics firms increasing the complexity of local logistics firms' business structures. This has led to a significant increase in the amount of industrial floorspace required by these firms as well as the type of fitout that they are now requesting which is more automated and significantly more sophisticated.
- ii. In order to fulfil future floorspace requirements, local logistics firms are now partnering up with land developers in order to get access to significant sites so they can be developed with the specific needs of the business in mind. The trend is now for distribution centres in the order of 75,000 sq.m (7.5 hectares) of floorspace to be developed. This is still significantly smaller than some distribution centres in other countries which are up to 200,000 sq.m in size, or larger. It is important to note that the subject site is significantly smaller than the current development trends across industrial lands.

Industrial Floorspace Design

- i. In the past, industrial/warehouse floorspace has traditionally been a homogenous product consisting of relatively simple buildings. This has changed in recent years with the specific requirements of particular tenants being taken into consideration during the initial development of the building.
- ii. Newer industrial buildings tend to include concrete slabs that can withstand a significant amount of weight, additional space to allow for the increased use of robotics, bays to accommodate larger trucks getting in and out of the sites. Consideration has also been given to working conditions for staff and security of the site when designing the initial building.
- iii. Industrial buildings are typically supported by a small amount of ancillary office floorspace. It is difficult to be precise about this level as the office requirements typically depend on the specific tenants industry in question. Nevertheless, recent industrial developments including warehouse and distribution centres for Aldi and Costco have included office floorspace of approximately 5% of total GLA.
- iv. Intermodal freight precincts are being developed throughout each of the major capital cities of Australia, including at:
 - Moorebank and Eveleigh in Sydney.
 - Bromelton in Brisbane.
 - Western Interstate Freight Terminal in Melbourne.

- v. With the growth in population in the major metropolitan cities, freight handling capacity is increasingly constrained by heavily congested road networks, so that more containerised freight needs to be moved by rail. A number of intermodal freight precincts which are located close to the national rail network are now being developed.

Implications for Brookvale

- i. The major metropolitan cities are the hubs for industrial land, given their access to major transport routes, intermodal terminals and ports/air links. The large modern industrial sheds are locating in new outer suburban industrial precincts. The subject site is not well positioned to fulfill this role.
- ii. Recent trends in industrial lands including the growth of logistics and e-commerce have changed the requirements of established suburban industrial areas. There is a transition occurring from traditional manufacturing to advanced manufacturing and innovative industries. While this transition occurs, there will be some repurposing of existing buildings or new development that needs to occur to meet the needs of new operators. This process, however, can take time and money.
- iii. The planning proposal is consistent with these trends in which the Brookvale industrial precinct is well positioned to serve a greater role in meeting the needs of innovative industries, however, the transition leads to some vacant space as this process occurs. It is economically vital to make use of this space as much as possible in the meantime.

2.3. Sydney Industrial Market

- i. The various major real estate companies such as Knight Frank, Savills, Colliers and the like, track industrial development throughout Australia's major capital cities including Sydney. Chart 2.1 outlines completed industrial floorspace by year throughout the Sydney market according to Knight Frank research dated February 2020. This shows that since the Global Financial Crisis in 2008/09, industrial development in Sydney has grown significantly, at an average annual growth rate of 5.5% over the 10 year period to 2019. Based on existing projects, the level of industrial development is projected to reach an unprecedented level in 2020 (refer Chart 2.1).
- ii. The typical use of industrial land use by sector is detailed in Chart 2.2. According to Savills, the primary use of industrial floorspace is for wholesale activities (41%). Other major uses of industrial land include transport and logistics (26%) as well as manufacturing and engineering (13%).
- iii. Information also sourced from Savills indicates that the Sydney West industrial precinct records significantly higher land values when compared with similar precincts at other capital cities (refer Chart 2.3). In 2019, Sydney industrial land values were more than twice that of the key industrial precincts of Melbourne and Brisbane.

- iv. Map 2.1 uses industrial land zoning to illustrate the key industrial precincts throughout the Sydney metropolitan area. As shown, industrial lands are concentrated in the western portion of Sydney. This is likely to be a function of the lower land cost (as compared with industrial lands closer to the city) and the ease of accessibility (in the form of major roadways).
- v. It is important to note that there are significant parcels of vacant, industrial zoned land around Kemps Creek (in close proximity to Sydney's second airport which is currently under construction at Badgerys Creek). By comparison, small industrial precincts such as Brookvale are largely fully occupied with older buildings with minimal land available for future modern industrial development. At a broad level, therefore, there is substantial further land available for industrial development to meet the ongoing needs of the broader Sydney population.
- vi. A significant consideration of tenants which occupy industrial lands is accessibility to ancillary goods and services. This is especially the case for wholesale operators with time and distance to markets an important factor when considering the relative value of industrial lands. The majority of international containers destined for Sydney arrive at Port Botany with the distance to this trading hub highly relevant for industrial land tenants. Sydney Airport which is located in close proximity to Port Botany is also a significant freight hub.

Map 2.1 illustrates a 30 minute drive time drive from Port Botany. As shown, large portions of industrial lands are situated within this drivetime (Alexandria, Strathfield, Liverpool, Padstow and Prestons) while Brookvale is beyond this 30 minute boundary. It is important to note that this drive time does not factor in traffic congestion, meaning that destinations further away are likely to take longer to access than those closer to Port Botany. From Map 2.1, it is easy to identify the level of industrial zoned land in relative proximity to key port facilities.

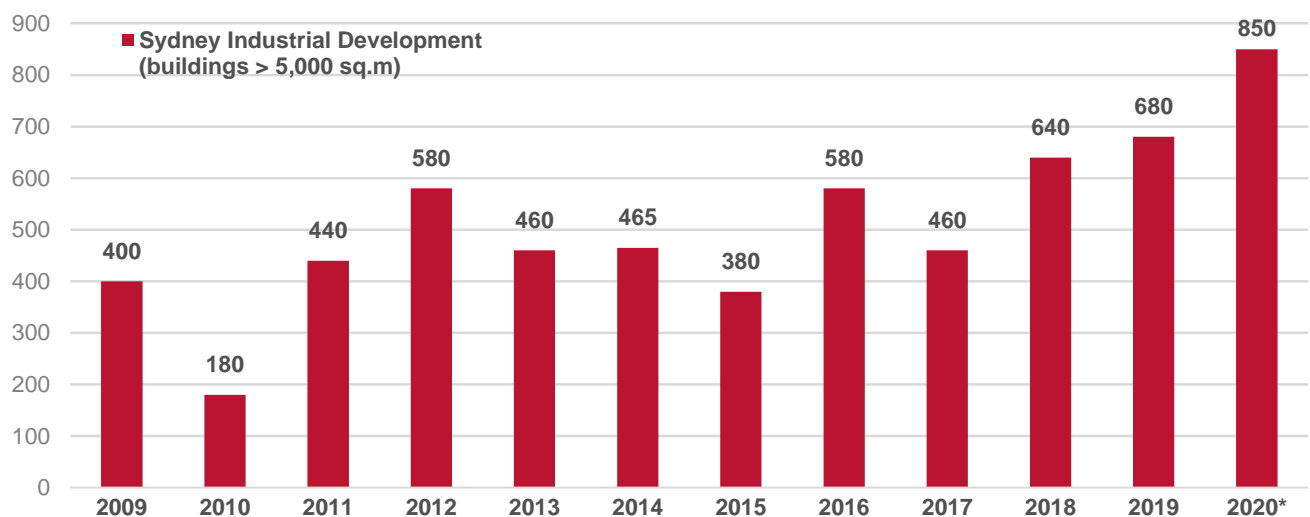
- vii. Chart 2.4 details the average land values for industrial precincts in Sydney (on a \$ per sq.m basis). This indicates that Alexandria, Botany and Maroubra are the most expensive precincts with this likely to be due to the proximity to the Sydney CBD/airport and trading hubs such as those detailed above.
- viii. Average industrial land values in Brookvale were in the order of \$850 per sq.m in 2019, well below the three key precincts detailed above. There are industrial precincts within a 30 minute drive time of Port Botany which offer lower land values (Moorebank and Prestons) as compared with Brookvale, reflecting the lack of greenfield land in Brookvale as compared with those precincts.
- ix. Table 2.1 provides a comparison of the key attributes of competing industrial precincts. This includes Brookvale as well as an inner west precinct (Strathfield South) and an outer west example (Prestons). Broadly speaking, the industrial precincts of Strathfield South and Prestons have a greater focus on heavy industry uses such as concrete suppliers, recycling processors and food manufacturers. Brookvale on the hand, has uses more typical of a business park with wholesale traders and self-

storage facilities. The differences in these uses across industrial precincts is likely to stem from the differing attributes of these precincts.

- x. Chart 2.5 details the proportion of industrial land development projected across the Australian states. This information was sourced from Colliers and encompasses projects currently under construction as well as those proposed. The share of the estimated resident population (ERP) within these states (as sourced from the ABS) provides a high level benchmark of the overall demand for industrial land in the short to medium term. Putting aside the existing stock, an approximate parity between these values would indicate a level commonly referred to as equilibrium or a balanced market.

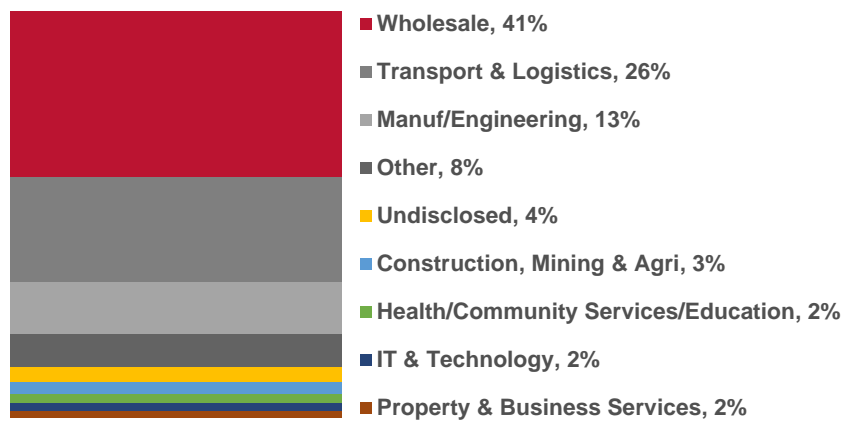
Relevantly, the proportion of current industrial development is significantly skewed towards New South Wales (primarily Sydney) at 46% of future floorspace. The share of the News South Wales population (33%) would indicate that an oversupply of industrial development is likely to be experienced in the medium term. By comparison, states including Queensland and Western Australia may experience an indicative under supply over this period.

CHART 2.1. SYDNEY INDUSTRIAL LAND SUPPLY, 2009 – 2020



* Estimated based on current projects
 Source: Knight Frank Research/Cordell Connect

CHART 2.2. TYPICAL INDUSTRIAL LAND USE



Source: Savills Research

CHART 2.3. INDUSTRIAL LAND VALUE COMPARISON AT CAPITAL CITIES (\$ PER SQ.M)



Source: Savills Research

MAP 2.1. INDUSTRIAL ZONED LAND IN SYDNEY

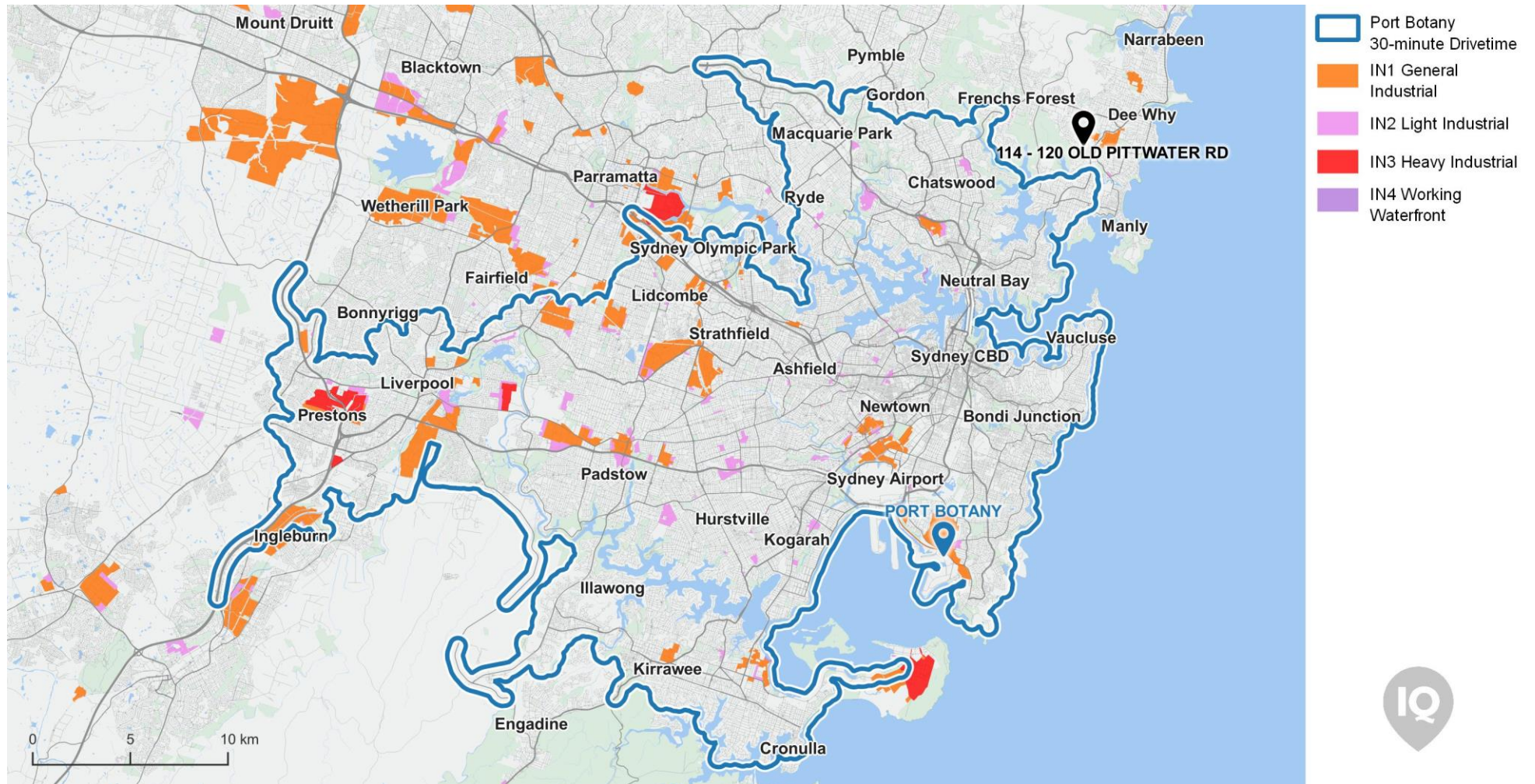


CHART 2.4. SYDNEY INDUSTRIAL LAND VALUE (\$ PER SQ.M) COMPARISON, 2009

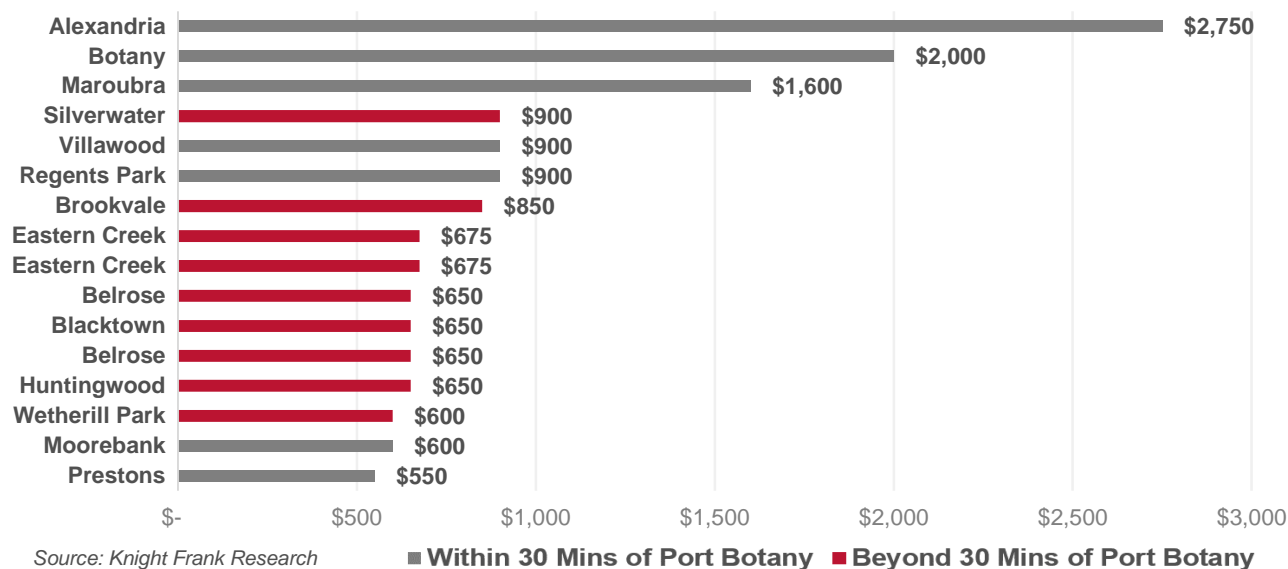
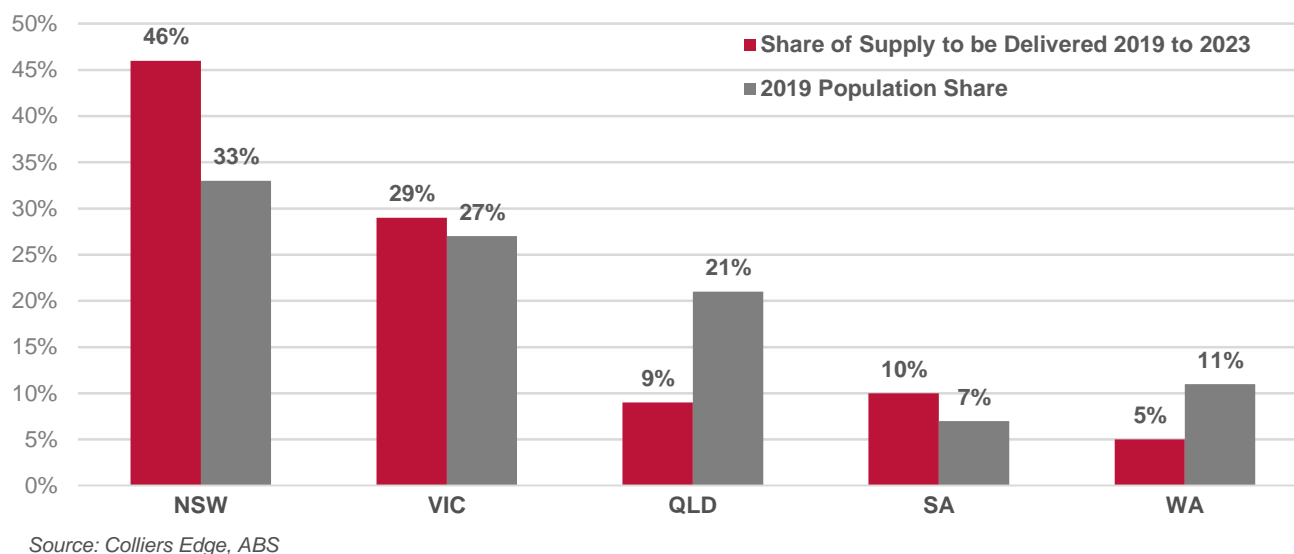


TABLE 2.1. COMPARABLE INDUSTRIAL PRECINCT ATTRIBUTES

Precinct Attribute	Brookvale	Strathfield South	Prestons
Surrounding Blue Collar Workforce	×	✓	✓
Within 30 Min of Port Botany/Sydney Airport	×	✓	✓
24 Hr access	✓	✓	✓
Access to rail infrastructure	×	✓	×
Proximity to Major Road (km)	0.2	0.0	0.0
Access through residential areas	Minimal	Minimal	Some Access

CHART 2.5. SHARE OF INDUSTRIAL LAND DEVT AND 2019 ERP



Implications for Brookvale

- i. The Brookvale industrial precinct sits in an area with a highly educated workforce. The land value of the precinct is relatively high as compared with other Sydney precincts.
- ii. The Sydney North District Plan indicates that across this entire area, it contains only four per cent of Greater Sydney's total stock of industrial and urban services land. Only approximately seven per cent (39 hectares) is undeveloped, indicating strong demand for this scarce resource. None of the Brookvale precinct land is undeveloped.
- iii. The industrial land in the North District Plan, including Brookvale, has a role to play in smaller industries including innovation and advanced manufacturing.
- iv. The concept or term 'advanced manufacturing' is necessary to distinguish from the older industrial model.
- v. Advanced manufacturers as globally-oriented and innovative manufacturers, in general share the following characteristics:
 - high Intellectual property component;
 - dependent on global supply chains;
 - the only public sector support needed is at the Research & Development phase through tax credits or leveraging public/private partnerships.
- vi. Advanced manufacturers tend to be engaged in collaborations with universities, the CSIRO and other research institutes, and they sell to a global market on distinctive qualities. The development of the Northern Beaches hospital is a major boost for the Brookvale area.
- vii. Advanced manufacturers are involved in the development of new markets, new products, new technologies and new ways to manufacture existing products.
- viii. This market, however, takes time to transition and the transition process is underway at Brookvale.
- ix. Last mile delivery will be another important component of the future Brookvale industrial precinct, as evidenced by the Woolworths Dark store at the subject site.
- x. In a product's journey from warehouse shelf to customer doorstep, the "last mile" of delivery is the final step of the process — the point at which the package finally arrives at the buyer's door. In addition to being a key to customer satisfaction, last mile delivery is both the most expensive and time-consuming part of the shipping process.

- xi. As recognised in the *Towards 2040 - Local Strategic Planning Statement* for the Northern Beaches at page 150 “*Freight connections in the LGA are constrained and distance to Sydney Airport, Port Botany and the future Western Sydney Airport is a challenge. Vehicles over 19 metres are prohibited on Sydney Road, the Spit Bridge and Warringah Road. This increases travel times, adds to the cost of deliveries and requires smaller trucks*”.
- xii. Retailers are working through this complex issue, however, increased warehouse space is likely to be required in areas like Brookvale to meet this growing industry. Again, however, this transition period can take time.

2.4. Office Floorspace with Industrial

- i. In the past, it was common for major industrial tenants to include their head office functions (marketing, administration, etc) with their warehouse facilities. This was particularly the case when at locations such as Brookvale, access to a white collar workforce was available, together with the provision of warehouses that met the needs of the business.
- ii. As industrial trends have resulted in larger warehouses in more distant locations, together with improvements in technology which enable remote working, there has been a decrease in the operation of major head offices together with the major business warehouse.
- iii. The proportion of office to warehouse space at Brookvale, at approximately 37%, is well above the level of office space typically built in larger industrial warehouses today at 10% (5% for Aldi and Costco as indicated previously).
- iv. Further the future uses at Brookvale industrial precinct, including advanced manufacturing and last mile delivery does not include a large office component as part of the sites. This is clearly evidenced by the Woolworths Dark store at the Primewest site.

Implications for Brookvale

- i. The industrial market is changing rapidly with the space required to be flexible to accommodate the different demands of various companies over time. Good design is critical to ensure it will suit different users such as allowing cool room or insulation to be added.
- ii. Recent evolutions of industrial floorspace have been brought about by advancements in logistics and E-Commerce.
- iii. The subject site is no longer relevant as large warehouse industrial land use with a large office component given these trends. New users, such as advanced manufacturing and last mile delivery do not include large offices as part of the industrial uses.

- iv. The significant investment in buildings on the existing site which continue to have a strong economic value and use, however, means the planning proposal seeks to make a greater use of the existing built form and not create economic waste. The planning proposal allows existing viable buildings to be used while a transition occurs in the types of users at Brookvale. This economic friction is unavoidable in a rapidly changing global economy.



3 OFFICE MARKET

This section reviews the commercial office market at a local level and discusses the demand and supply of office floorspace on the North Beaches.

3.1. Sydney Office Market

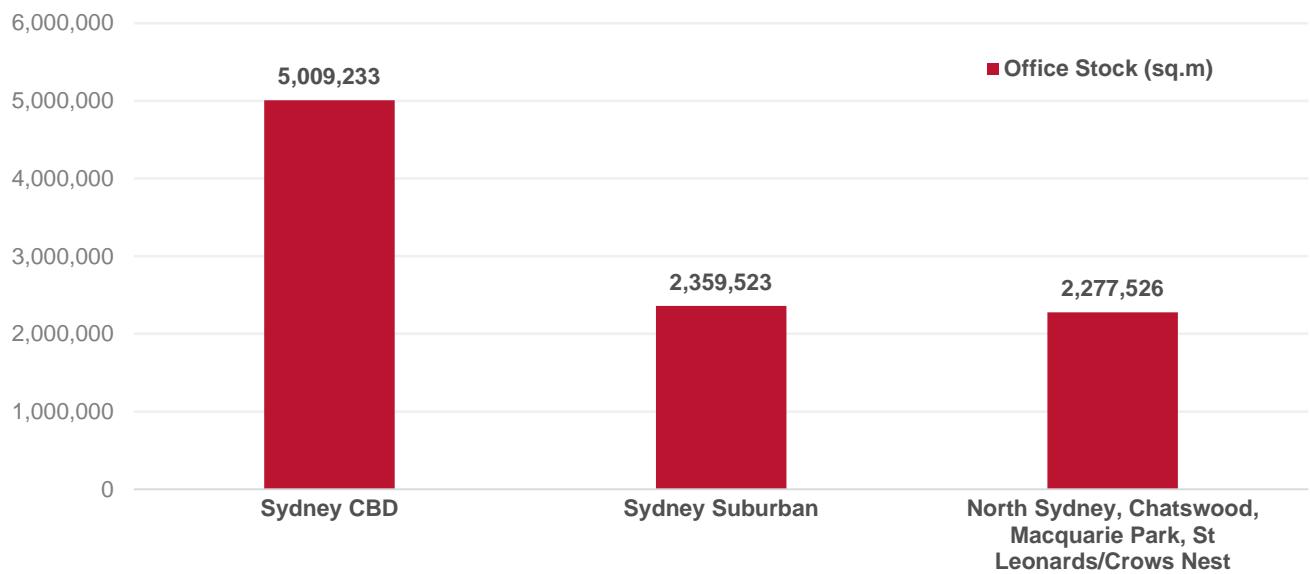
- i. The Sydney office market is concentrated within the CBD and other major centres (North Sydney, Macquarie, Parramatta and Chatswood), although, precincts of commercial floorspace are located throughout suburban parts of Sydney.
- ii. Chart 3.1 details the total stock of office floorspace across Sydney (CBD, northern Sydney and suburban markets). As shown, the suburban market is approximately half that of the CBD market size (in sq.m). This indicates that suburban markets (in total) are an important component of Sydney's overall supply of office floorspace.
- iii. A key driver of the demand for office floorspace is the attraction of developing a critical mass of similar tenants. This is observed in the Sydney CBD (diversified financials), Macquarie Park (telecommunications and pharmaceuticals) and St Leonards (call centres).
- iv. At Brookvale there have traditionally been trade or building companies as well as manufacturers with warehouse/office requirements.
- v. Chart 3.2 details the net face office rents on a per sq.m basis and generally indicates that rents reduce in line with the distance from the CBD which records the highest average rents. Suburban office precincts have likely been driven by the lower cost of office rents outside the CBD along with the provision of key infrastructure.
- vi. Along with rents being higher in the CBD, the level of vacancy is generally accepted to be lower than that of suburban markets. In particular, in recent times, the development of the Sydney Metro together with strong residential demand, has seen net absorption of office stock in the Sydney CBD.
- vii. As a result, vacancy rates are very low with costs and the lack of available supply often prohibitive for prospective tenants looking at the CBD market. The current Sydney CBD office vacancy rate is 3.6% well below the long term average of 10%.

- viii. The implications of the above, is that there is increased demand for office floorspace in the suburbs, as inner city office floorspace becomes more scarce and more expensive.

3.2. Northern Sydney Office Market

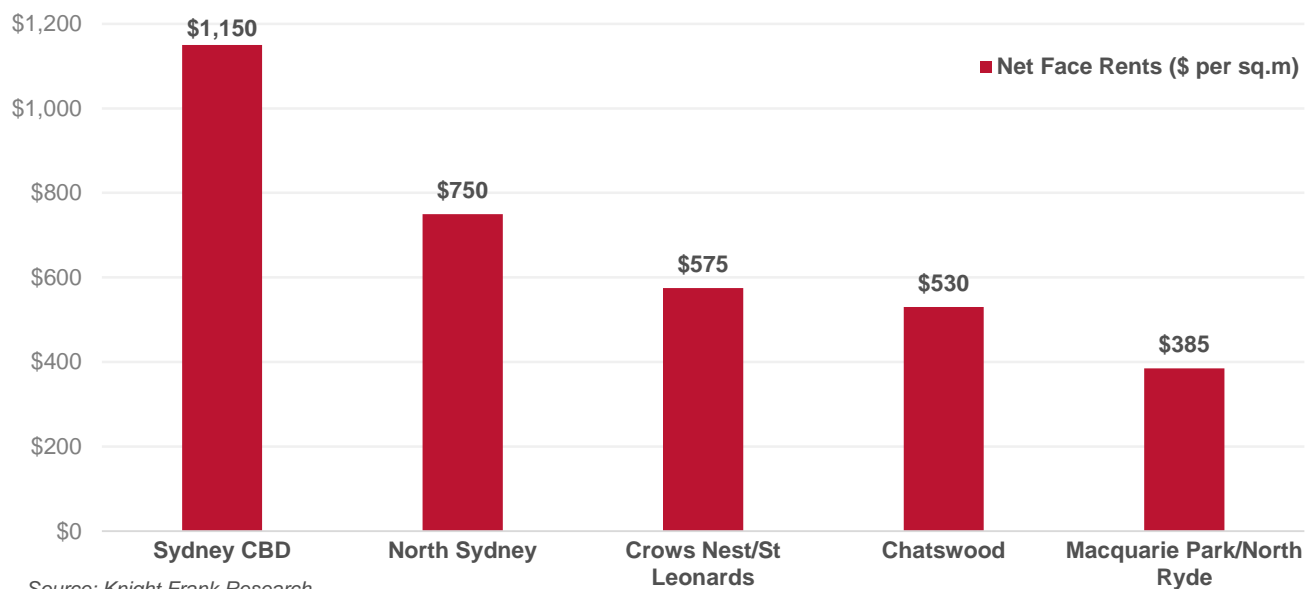
- i. Chart 3.3 outlines recent vacancy rates reported at the major office markets closest to the subject site, noting that office vacancy rates are not readily available for Brookvale or similar small precincts. As shown, similar to the Sydney CBD, the level of vacancy has contracted at North Sydney and Chatswood while remaining flat at St Leonards and Crows Nest.
- ii. According to the Property Council, the historical vacancy average for office floorspace is just under 10% across the country. The low levels of vacancies have been driven by the limited new stock along with a high level of conversion from residential uses.
- iii. Improvements in infrastructure such as the development of the Metro rail network currently under construction will likely lead to greater demand for office floorspace at St Leonards, Crows Nest and North Sydney in the medium term. Most recently, the redevelopment of 1 Denison Street (60,000 sq.m) and 100 Mount Street (40,000 sq.m) have been predominately leased prior to completion of construction. This confirms the current demand for a significant volume of office floorspace in Northern Sydney.
- iv. Chart 3.4 outlines the level of commercial core zoned land at competing office precincts to Brookvale (illustrated on Map 3.1). Although office use is permissible under other zones, commercial core land encompasses intensive business activities in close proximity to public transport. As shown, the level of commercial core zoned at Brookvale is comparable to North Sydney, although, without the significant density brought about by commercial towers.
- v. The overall level of commercial core zoned land at Brookvale is 17.1 ha which is significantly lower than that which is provided at Chatswood (30.3 ha) and Macquarie Park (75.3 ha). Furthermore, Scentre Group (the operator of Westfield Warringah Mall) control almost all the commercial core zoned land at Brookvale and use that for a shopping centre. As a result, the majority of commercial core land in Brookvale is not being used for commercial offices, meaning that the commercial land is a shopping centre precinct but not able to accommodate office uses which are being demanded in the area. The subject site could fulfil this role in the short to medium term.

CHART 3.1. TOTAL OFFICE STOCK COMPARISON, 2019



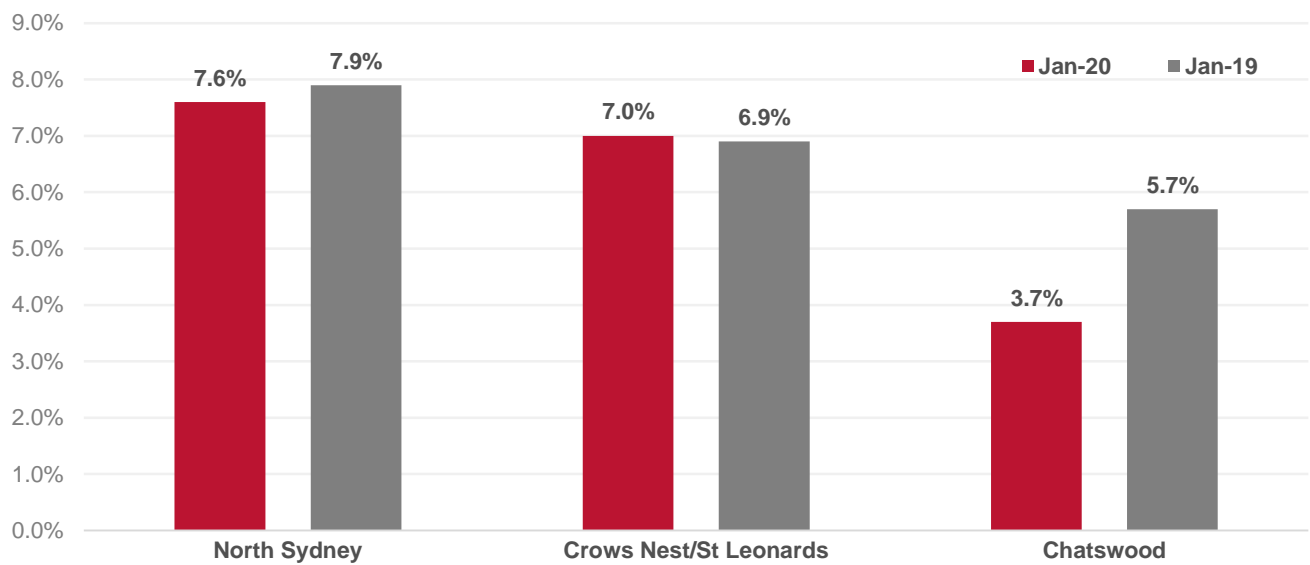
Source: Knight Frank Research

CHART 3.2. SYDNEY OFFICE RENTS (\$ PER SQ.M) BY PRECINCT, 2019



Source: Knight Frank Research

CHART 3.3. OFFICE VACANCY LEVELS, 2018 – 2019



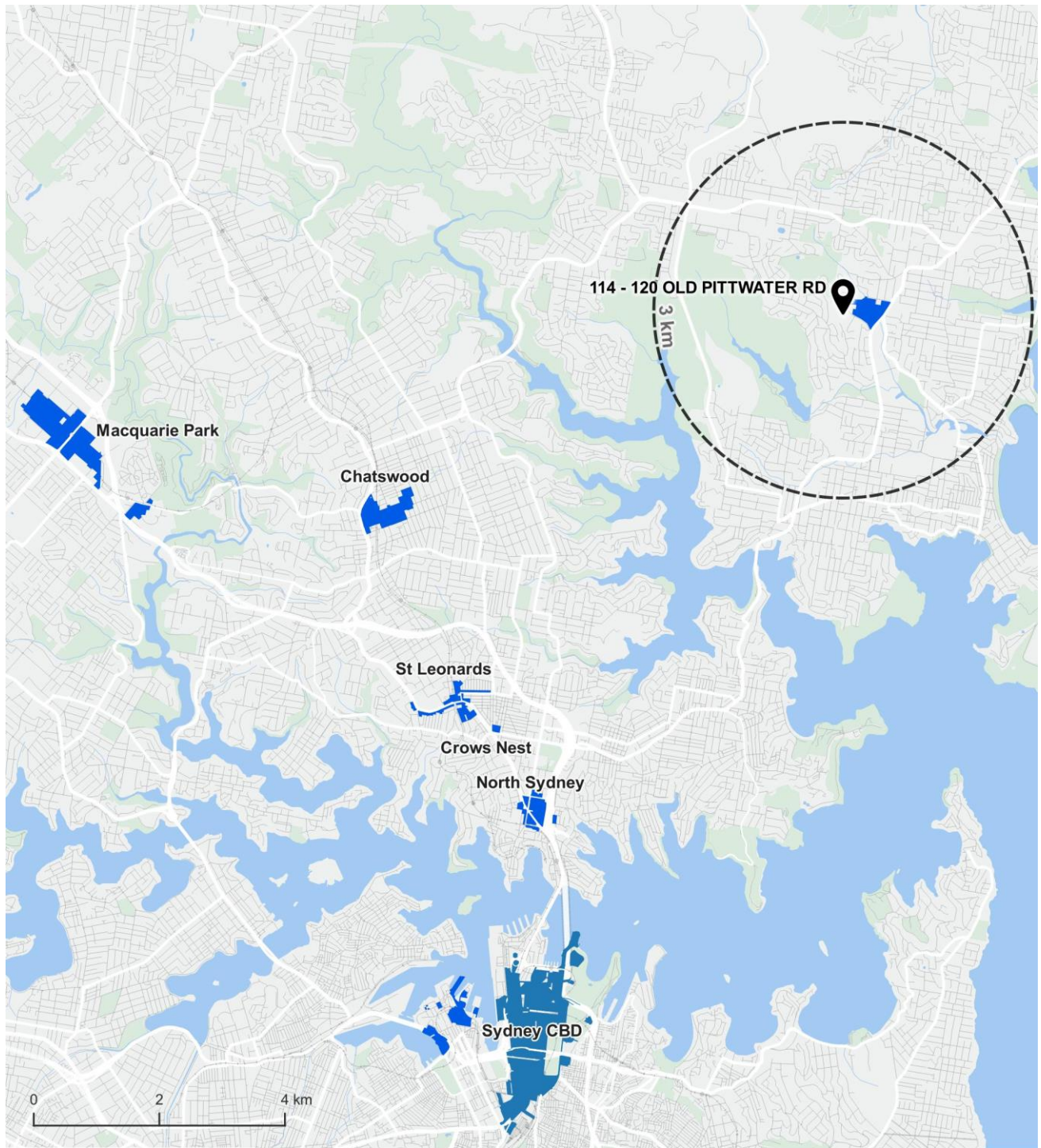
Source: Property Council Australia


CHART 3.4. COMMERCIAL CORE LAND ZONING BY PRECINCT



Source: Respective LGAs

MAP 3.1. NORTHERN SYDNEY COMMERCIAL CORE LAND ZONING



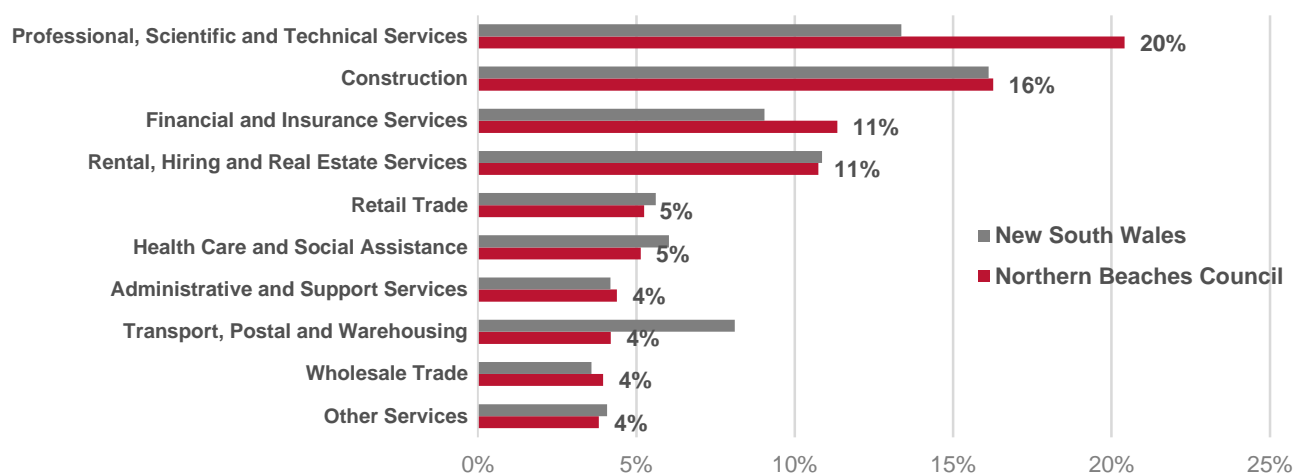
-  B3 Commercial Core
-  B8 Metropolitan Centre



3.3. Northern Beaches Office Demand

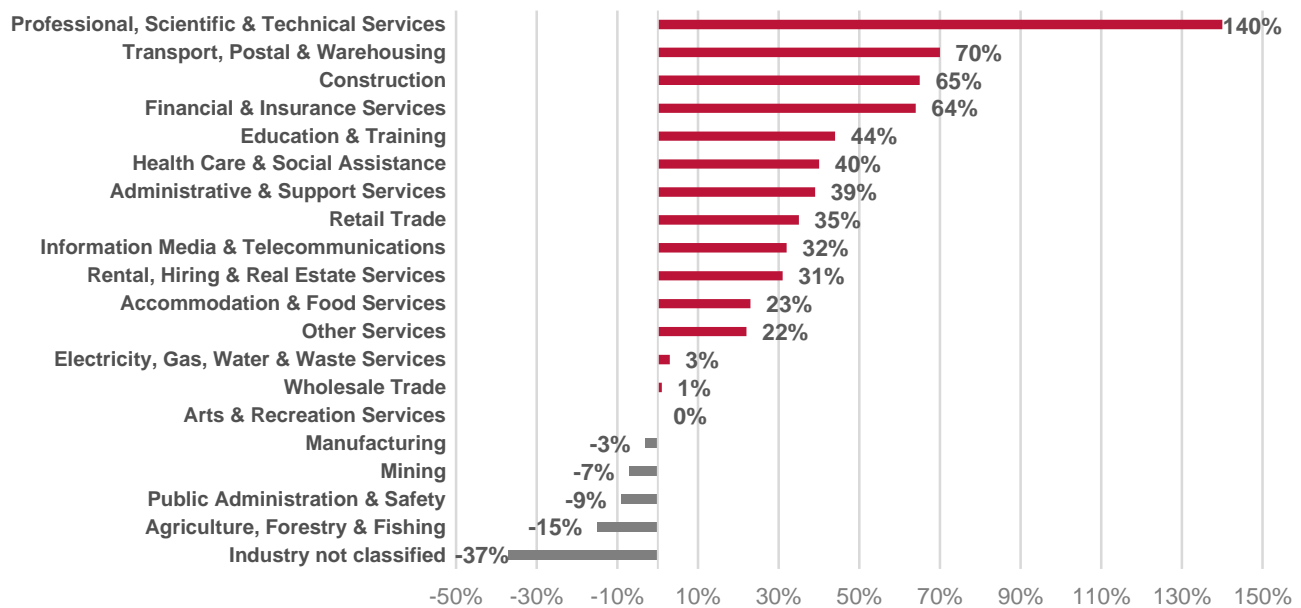
- i. The demand for office floorspace is primarily driven by private businesses in suburban markets such as Brookvale. As a result, there is likely to be a positive relationship between the number of businesses and the absorption of office floorspace. It is also important to note that the nature of business activities is likely to be relevant in determining the overall level of demand for office floorspace.
- i. Chart 3.5 details the proportion of businesses by sector for the North Beaches Council as well as being benchmarked against New South Wales. Key points to note include:
 - The Northern Beaches accommodates a greater proportion of office generating floorspace such as Professional, Scientific and Technical Services as well as Financial and Insurance Services.
 - The Northern Beaches supports a lower proportion of Transport, Postal and Warehousing businesses as compared with the overall level in New South Wales. This industry sector is likely to generate the greatest demand of industrial floorspace.
- ii. Chart 3.6 details the change in registered businesses over the 2018 to 2019 period. This indicates that the greatest growth was experienced in the Professional, Scientific and Technical Services industry while contractions occurred in the Manufacturing and Mining related businesses.
- iii. In summary, the demand for office floorspace in the Northern Beaches Council is higher than the state benchmark with core office generating industries experiencing significant growth in demand recently. This demand is also occurring in the Northern Beaches area.

CHART 3.5. BUSINESSES BY INDUSTRY SECTOR (TOP 10), 2019



Source: ABS, Counts of Australian Businesses

CHART 3.6. CHANGE IN REGISTERED BUSINESSES, 2018 – 2019



Source: ABS, Counts of Australian Businesses

3.4. Northern Beaches Office Supply

- i. The existing level of office floorspace supply in Brookvale is limited when compared to that of Frenchs Forest or other surrounding precincts. Map 3.2 illustrates office space which is currently advertised for lease in the immediate area. There is generally a low level of supply as compared with other parts of Northern Sydney. Relevantly, the size of the office space for lease in this area are all typically quite small at less than 500 sq.m and would suit a limited range of users.
- ii. The subject site has the ability to offer larger office space areas for a user looking to accommodate a number of workers at the one site. The lack of choice in the Northern Beaches market is very limiting factor for prospective tenants. The greater the provision of office floorspace, the greater the likelihood that an area can be self-sufficient for the employment of its residents (i.e. residents work near where they live).
- iii. Knight Frank has reported that the total level of the Northern Sydney office floorspace is in the order of 530,000 sq.m. The vacant floorspace at 114 - 120 Old Pittwater Road represents approximately 1% of this office market floorspace and less than 1% of floorspace across the total Sydney suburban market. This highlights the relative size of the office market and demonstrates that there are minimal, if any, implications for competing precincts from the Planning Proposal. The use of vacant office floorspace on the subject site for office use only is insignificant in the scale of broader Northern Sydney demand.

As a result of the above, the subject site would not increase vacancy rates in other office precincts. Furthermore, the planning proposal will assist in the supply of employment generating office floorspace which will continue to be driven by overall employment growth.

- iv. The ABS publishes data of building works (by type) for each LGA in Australia. A summary of this data for residential and office builds (latest available) is displayed in Chart 3.7. This includes alterations/additions as well as new builds for private and public sector projects. As shown, total works for residential builds across the Northern Beaches are significantly higher than that of office projects for the period March 2019 to June 2019.
- v. Total residential building values typically form the majority of building activities. The overall level of office builds across the Northern Beaches was 1.8% in Q4 2019. A review of nearby LGAs indicates that this is a relatively low level of investment when compared to that which was recorded at Mosman, North Sydney and Willoughby (refer Table 3.1).
- vi. The lack of office development is a result of the lack of vacant sites which are suitable for commercial offices throughout the Northern Beaches. Map 3.3 illustrates current commercial office projects as sourced from the Cordell Connect database.
- vii. Map 3.3 includes an indicative number of workers based on the assumption that one worker is provided per 13 sq.m of total office floorspace. As shown, there is a limited number of current proposals. Furthermore, the current proposals are relatively small as compared with projects in the larger centres of North Sydney and St Leonards.
- viii. The largest office proposal on the Northern Beaches currently is for a fitout of the existing building at 1 Garigal Road in Belrose. This project is expected to accommodate approximately 350 workers. Despite Belrose accommodating a business park precinct, this is the only known proposal for additional office floorspace in the suburb.
- ix. The lack of development for new office space at Belrose is likely to be due to the limited options of transport links which the precinct is serviced by. Furthermore, Belrose accommodates a lower population density as compared with Brookvale. A surrounding population base is important as it enables workers to reside in close proximity to their place of work.
- x. In conclusion, there has historically been a significant underinvestment in commercial office developments across the Northern Beaches. A review of current projects indicates that this underinvestment is likely to continue which will ultimately further increase the undersupply of office floorspace in the short to medium term.

Consequently, the Planning Proposal will add choice to the market and at the same time, not impact on the viability of other projects in the area, given the low level of supply.

MAP 3.2. ADVERTISED OFFICE LEASES

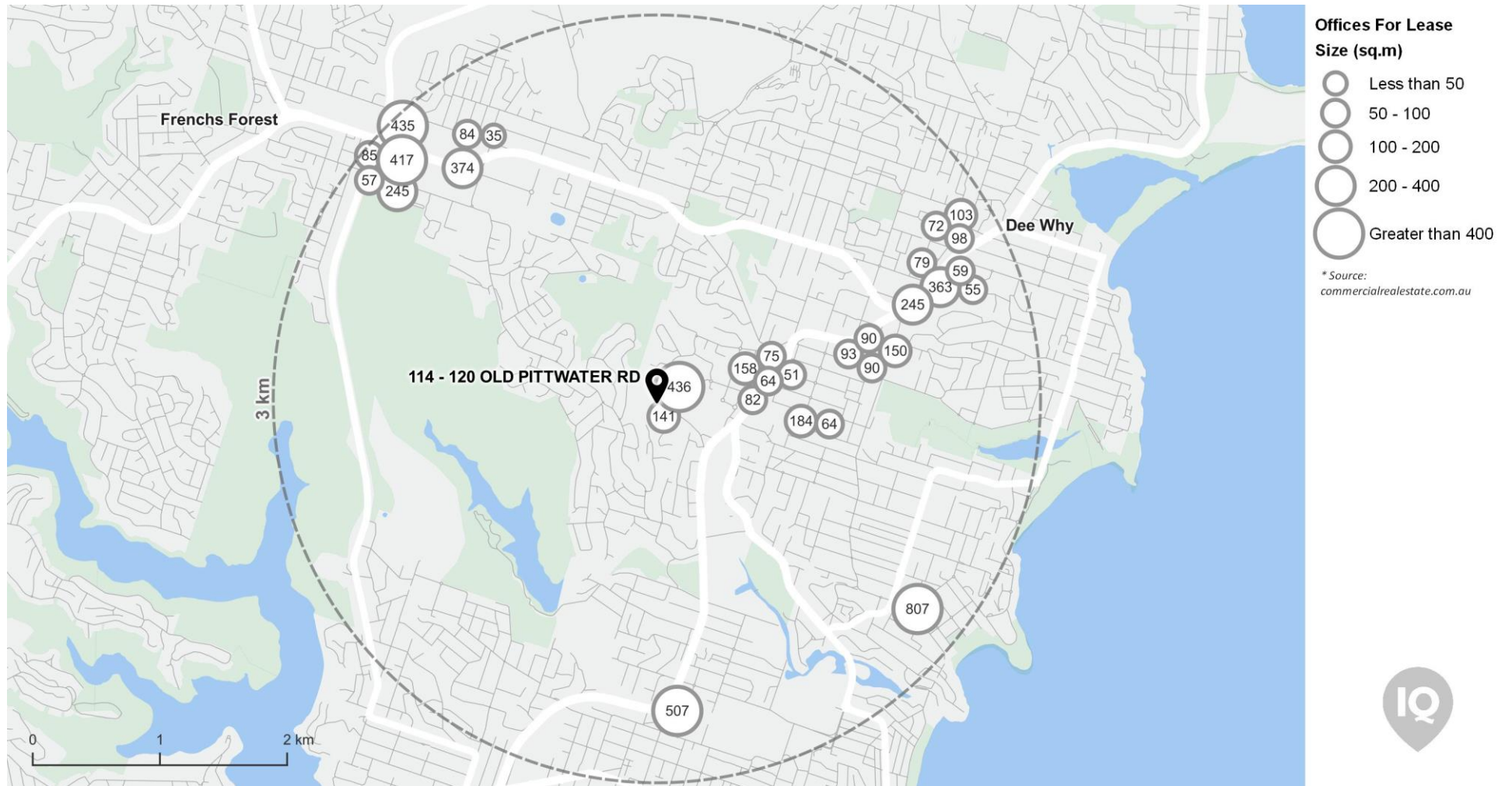
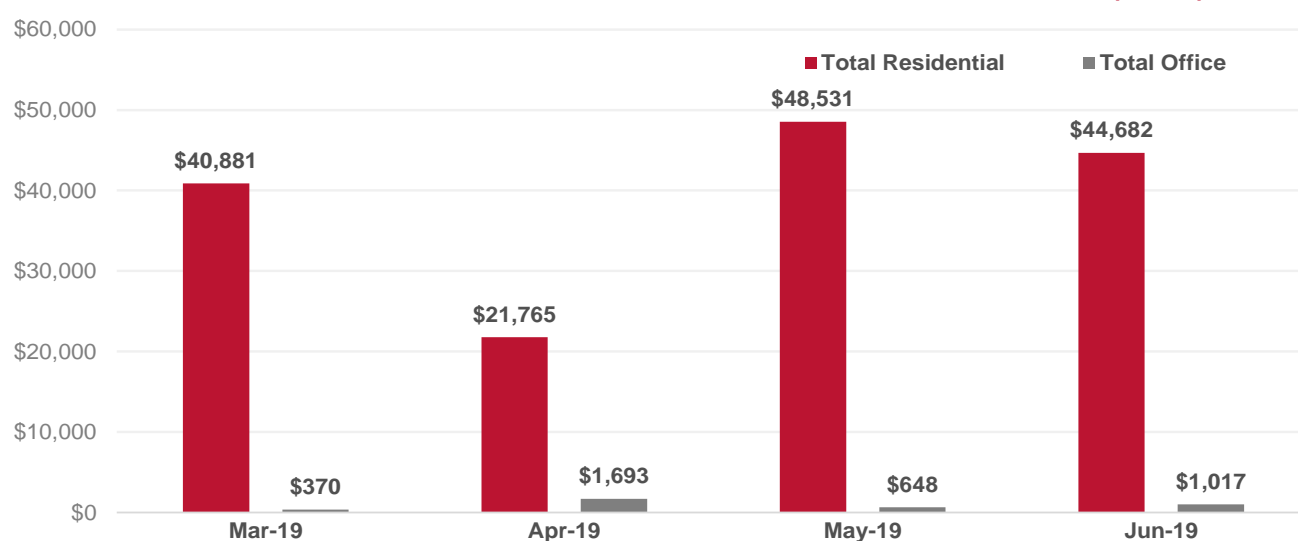


CHART 3.7. NORTHERN BEACHES TOTAL BUILD VALUE, MAR19 – JUN19 (\$'000)

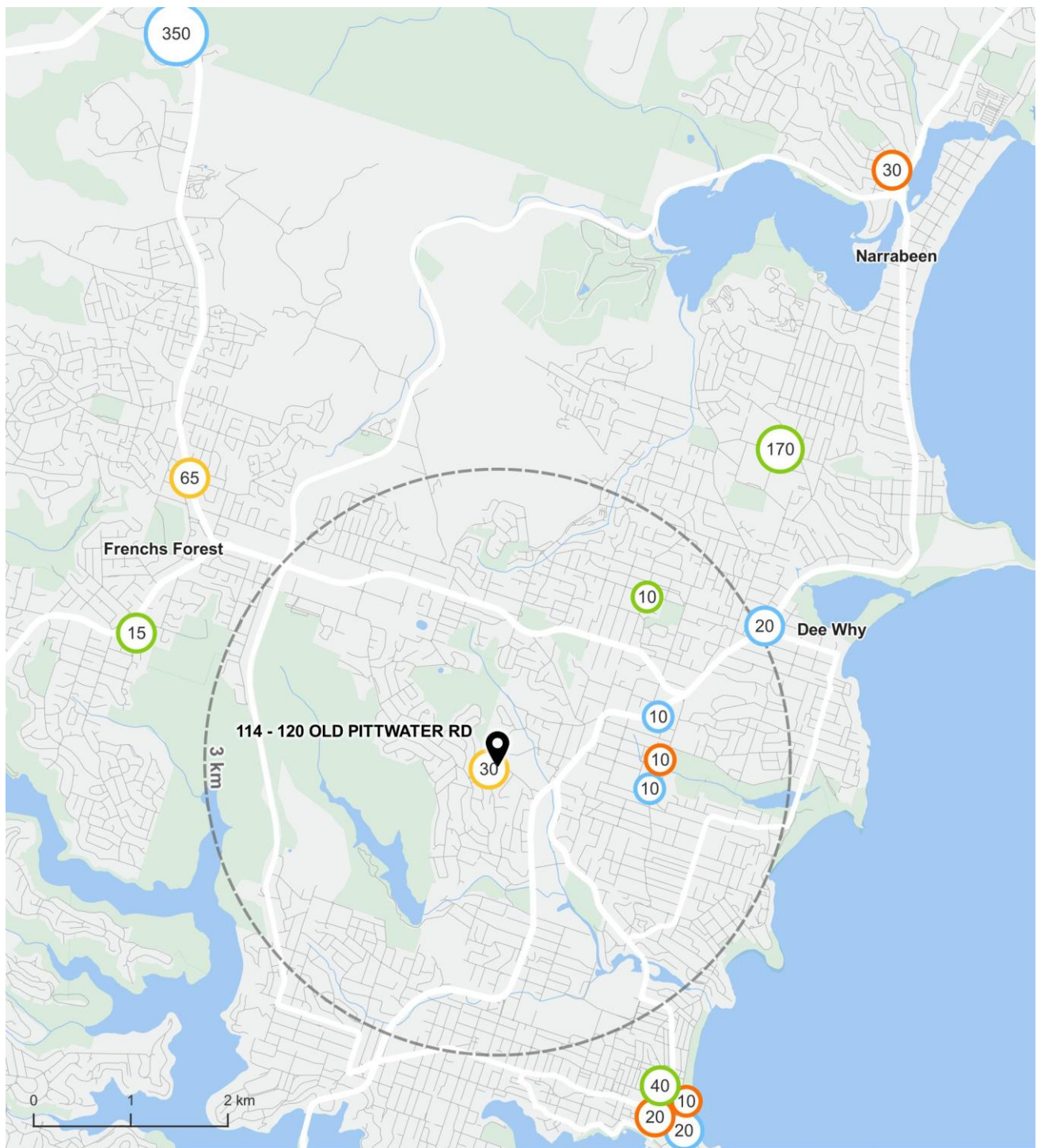
Source: ABS

TABLE 3.1. OFFICE BUILDING VALUES BY LGA, MAR19 – JUN19

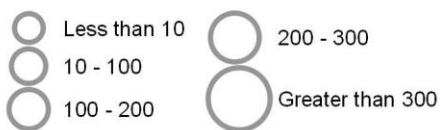
Local Government Area	Office Building Works (\$'000)	Total Building Works (\$'000)	Share of Office Investment
Ku-ring-gai	\$ 1,062	\$ 195,822	0.5%
Mosman	\$ 1,577	\$ 58,689	2.7%
North Sydney	\$79,942	\$ 146,362	54.6%
Northern Beaches	\$ 3,728	\$ 208,899	1.8%
Willoughby	\$ 3,497	\$ 70,525	5.0%

Source: ABS

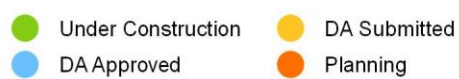
MAP 3.3. COMMERCIAL OFFICE DEVELOPMENTS ON THE NORTHERN BEACHES



Number of Workers



Development Status



3.5. Summary

- i. Commercial office precincts across Sydney have been experiencing a high level of demand and a consequent low level of vacancy. Rents have been increasing.
- ii. Although most major precincts have been developing new office floorspace, the Northern Beaches area has seen limited new supply, given the lack of available land for development. Most available office spaces for lease are for small sized spaces (less than 500 sq.m).
- iii. There have been rapid changes in the office market including:
 - Greater work from home.
 - Better internet connectivity.
 - Access to childcare and retail being required.
 - Transport times increasing.

These attributes are highly relevant for the subject site which represents a unique location in the context of the Northern Beaches.

- iv. As outlined previously, businesses such as Professional, Scientific and Technical Services form a major part of the region's employment and generate demand for office floorspace. The Northern Beaches enjoys a comparative advantage for such services which are best placed to achieve innovations given the skilled requirements of employees within these businesses (matching the skills of surrounding residents).
- v. The planning proposal seeks to allow space for innovative industries within the Brookvale precinct, co-locating with potential innovative industrial users and close to research precincts such as the Northern Beaches hospital.
- vi. The subject site provides large floorplate office space in an ideal location near existing infrastructure such as shopping centres and public transport to meet the needs of commercial users in the region. This will promote more efficient use of infrastructure.
- vii. The Planning Proposal will also improve employment self sufficiency for the Northern Beaches area (i.e. employees reside near their place of work, rather than travelling outside the area for employment).
- viii. Further, given the rapid increase in office rents, the subject site can provide cost-effective accommodation for larger office users, while having negligible implications for existing and proposed office developments.

4 NEEDS ANALYSIS

4.1. Site and Precinct Attributes

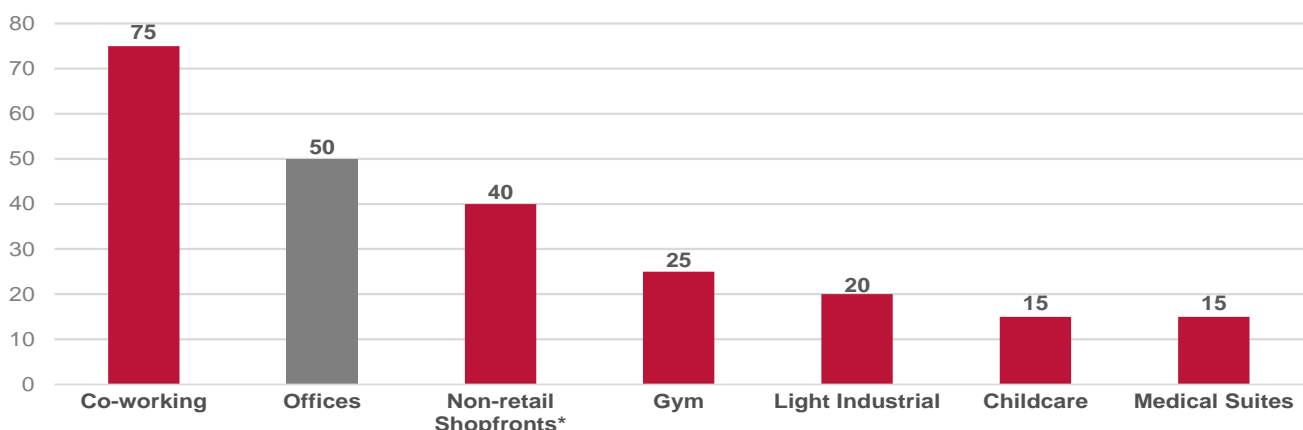
- i. There are a number of attributes which 114 - 120 Old Pittwater Road enjoys that makes the site suited to office use in the short to medium term while the precinct transitions from traditional industrial to advanced manufacturing, including:
 - Public transport links
 - Proximity to major roads
 - Local population (skilled workforce)
 - Substantial car parking
 - Affordable rents
 - Nearby retail facilities
- ii. It is concluded that these attributes are highly beneficial to office use.

4.2. Employment Assessment

- i. Allowing existing office premises on the Old Pittwater Road site to be used independently of any warehouse/manufacturing type uses would enhance the employment of Brookvale. Chart 4.1 details a comparison of land uses and their employment generation per 1,000 sq.m floorspace. As shown, commercial floorspace accommodates the generation of approximately 50 jobs per 1,000 sq.m. By comparison, light industrial land uses generate in the order of 20 jobs per 1,000 sq.m. These figures are in-line with industry benchmarks.
- ii. It is important to note that the majority of the 114 - 120 Old Pittwater Road site (southern building) is currently vacant. This would imply that the landlord has been unable to fill this space with tenants which comply with the existing planning controls. As a result, a significant portion of floorspace at 114 - 120 Old Pittwater Road is not contributing to the overall employment of the Brookvale precinct.
- iii. In the case of existing tenants at the Old Pittwater Road site, it is important to note that there is limited existing demand for supporting office floorspace to industrial uses (as evidenced by the amount of currently vacant floorspace). In the case of the Woolworths dark store, it is not feasible for supporting office use to be located at Brookvale with the company preferring to locate office staff with the majority of the office workforce at Bella Vista.

- iv. Table 4.1 summarises the projected level of ongoing employment likely to be generated by the proposal. Based on information supplied by Primewest, 15,657 sq.m of GLA is to be utilised as office floorspace under the planning proposal. The below figures assume that this office space is fully occupied while excluding the contribution of any other space on site. Office employment benchmarks (50 jobs per 1,000 sq.m) are used to calculate the indicative total jobs generated, as follows:
- Assuming the 114 - 120 Old Pittwater Road site is used as a traditional office, the building is projected to accommodate 783 persons in total on an ongoing basis. Taking a conservative view and allowing for an estimated 10% of the total increase to be because of reduced employment at existing facilities, net additional jobs are estimated at 705.
 - In addition to this direct employment, multiplier effects will flow through the local economy and indirectly generate additional employment opportunities through ancillary businesses/suppliers that support the development and services, as well as additional consumption expenditure by workers employed within the precinct (spending wages).
 - By using the appropriate ABS Input/Output Multipliers, it is estimated that an additional 669 jobs will be created indirectly. This assumes that 15,657 sq.m of office floorspace is occupied.
- v. Overall, some 1,373 jobs are likely to be created both directly and indirectly as a result of the planning proposal.
- vi. Based on Average Weekly Earnings data released by the ABS in November 2019 (Cat. 6302.0) the additional permanent employees would earn combined total salary/wages of some \$21.0 million (\$29,874 per worker per year) at the site, reflecting additional salary/wages for the local economy, as a direct result of the proposal.

CHART 4.1. EMPLOYMENT GENERATED PER 1,000 SQ.M OF FLOORSPACE



Source : Australian National Accounts: Input-Output Tables 1996-97, Cat 6302.0 Average Weekly Earnings, Australia
 * Includes Banks, Real Estate Agents etc

TABLE 4.1. ONGOING EMPLOYMENT GENERATION

Metric / Category	Est. Net Employment Increase ¹	Employment Multiplier Effects	Total Employment
Ongoing Employment from Existing Floorspace			
Commercial Floorspace @ 15,657 sq.m	705	669	1,373

1. Net increase includes an allowance for reduced employment levels at impacted centres estimated at 10% of the total increase

4.3. North District Regional Plan

- i. The North District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney.
- ii. The document recognises there is no undeveloped industrial land in the Brookvale area and limited available land elsewhere in the North District. Lack of land, therefore, is not the issue for industrial land but the ability of that land to meet modern user requirements.
- iii. The Brookvale-Dee Why Strategic Centre provides the largest number of jobs on the Northern Beaches. The total number of jobs in the North District Plan is targeted to grow from 20,000 jobs in 2016 to 26,000 jobs by 2035.
- iv. The use of the office space on the subject site will help achieve the jobs growth target at this significant Strategic Centre without reducing the quantum of industrial zoned land and utilising existing infrastructure and built form.
- v. The key actions to strengthen Brookvale-Dee Why in the future include:
 - a) maintain the mix of uses so that Brookvale-Dee Why continues to perform strongly as a well-balanced, self-sustaining combined centre
 - b) encourage and support improvements to Warringah Mall and better integrate it within the fabric and life of Brookvale-Dee Why
 - c) recognise and enhance the economic and employment opportunities along Pittwater Road and encourage revitalisation along the commercial strip
 - d) promote walking, cycling and public transport to Warringah Mall, the Brookvale industrial area and Dee Why
 - e) encourage the establishment of new, innovative and creative industries in the Brookvale industrial area

- f) encourage new lifestyle and entertainment uses to activate local streets in Brookvale-Dee Why
 - g) improve connections between Brookvale-Dee Why and the Northern Beaches Hospital at Frenchs Forest
- vi. To achieve these goals, flexibility is key. Allowing greater flexibility at the subject site will enhance the opportunities to attract more innovative and creative industries, including over time advanced manufacturers and last mile delivery. The potential subject office users may be able to service a broad number of users in the Brookvale industrial precinct/Northern Beaches and not just one tenant (as required by its current configuration). This economies of scale will allow other firms, who do not have the demand for substantial head offices, to have the support services close by within this evolving precinct.
- vii. At a broader level, the planning proposal will increase the attractiveness of doing business in the Northern Beaches.

4.4. Use of Infrastructure

- i. As noted previously, the Planning Proposal will make better use of the substantial investment in the existing built form on the site.
- ii. Allowing the subject site to accommodate unrestricted offices would also make greater use of the existing infrastructure in the surrounding area. The greater level of employment which could be generated at the subject site would create additional workers travelling to Brookvale and making use of public transport and existing shopping facilities. It is also important to note that formerly occupied space at 114 - 120 Old Pittwater Road has caused a reduction in employment given that a large proportion of space is currently vacant.
- iii. As detailed earlier, Brookvale has a significant provision of public and private infrastructure, including:
 - The major provision of retail floorspace at Westfield Warringah Mall.
 - Public transport including a number of busses which run along the nearby Pittwater Road.
 - Proximity to surrounding residential areas which reduces the need for residents to travel to other commercial centres such as the Sydney CBD.
- iv. The *Towards 2040 - Local Strategic Planning Statement* details how Brookvale is the most accessible centre in the LGA (based on people who can get to it in 30 minutes by public transport). This highlights the resident populations accessibility to the precinct.

- v. Furthermore, Brookvale is recognised in the *Towards 2040 - Local Strategic Planning Statement* as an employment and innovation centre. It is the LGA's largest employment hub, accommodating one third of the LGA's jobs. The document states:

Brookvale includes Warringah Mall, one of the largest malls in Greater Sydney and an example of the significant role of the private sector in strategic centres. It also includes a cluster of community infrastructure including the \$50 million Brookvale Community Health Centre opened February 2018, TAFE NSW, and Brookvale Oval, where a \$36 million centre of excellence was announced early 2019. Brookvale also includes organisations and businesses that offer social, lifestyle and community functions, such as Manly Warringah Leagues Club. The draft Brookvale Structure Plan, exhibited in 2017, supports an employment-based centre that is a great place to live and work, with more night-time activities for the young and culturally diverse population.

- vi. For residents of Brookvale and surrounding suburbs, the increase of more labour intensive, office floorspace is likely to reduce the travel time to work. Table 4.2 provides a comparison of travel time to competing office precincts in Northern Sydney. Despite the existing transport networks, travel times are substantial for both private vehicles and public transport.

The parking limitations of competing commercial centres means that public transport is likely to be the favoured method of travel to work for most employees. As shown, access to the closest commercial centres (St Leonards, North Sydney and Chatswood) requires almost an hour of travel time. For residents of Brookvale travelling to these centres for work, this represents almost two hours of travel time on a daily basis.

TABLE 4.2. OFFICE PRECINCT TRAVEL TIME COMPARISON

Distance from Subject Site	Vehicle*		Public Transport**
	KM	Typical Mins	Typical Mins
St Leonards	13.2	20 - 45	52
North Sydney	13.2	20 - 45	54
Chatswood	13.4	16 - 30	53
Sydney CBD	15.8	22 - 55	39
Macquarie Park	20.5	26 - 50	80

*Shortest Route

**Fastest Option

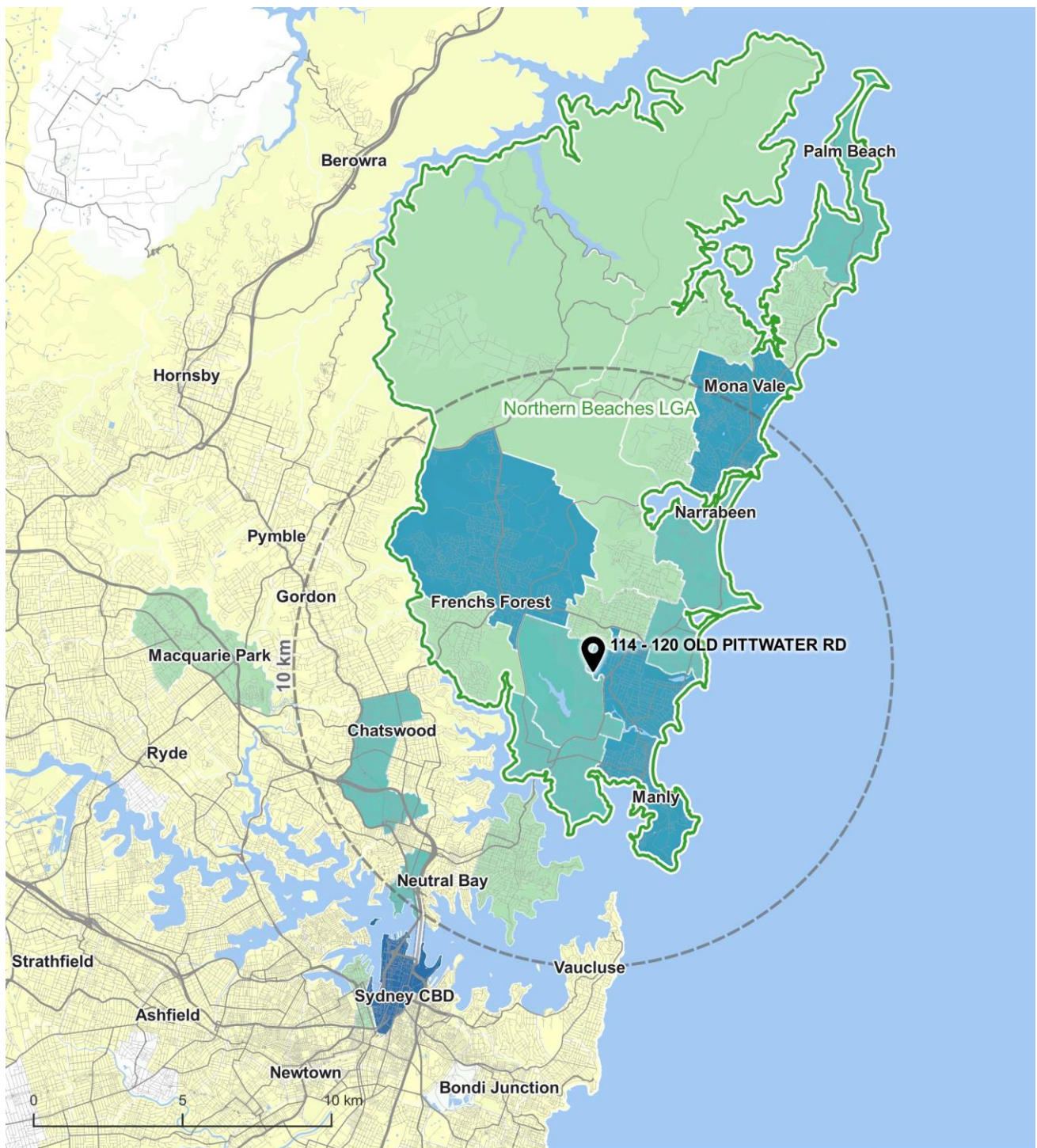
- vii. Map 4.1 highlights where residents within the Northern Beaches LGA work, as sourced from the 2016 Census. Outside of the Northern Beaches LGA, high proportions are recorded in the suburbs of St Leonards, North Sydney as well as the Sydney CBD. These are mainly office precincts and the

retention of these jobs locally will result in positive economic benefits for local residents and businesses at Brookvale.

- viii. Map 4.2 presents similar information but for where workers within the Freshwater - Brookvale Statistical Area 2 (SA2) reside. High proportions are recorded at the Freshwater - Brookvale SA2 and the surrounding SA2's. Workers generally reside in close proximity of their place of work with centres further away drawing less workers.



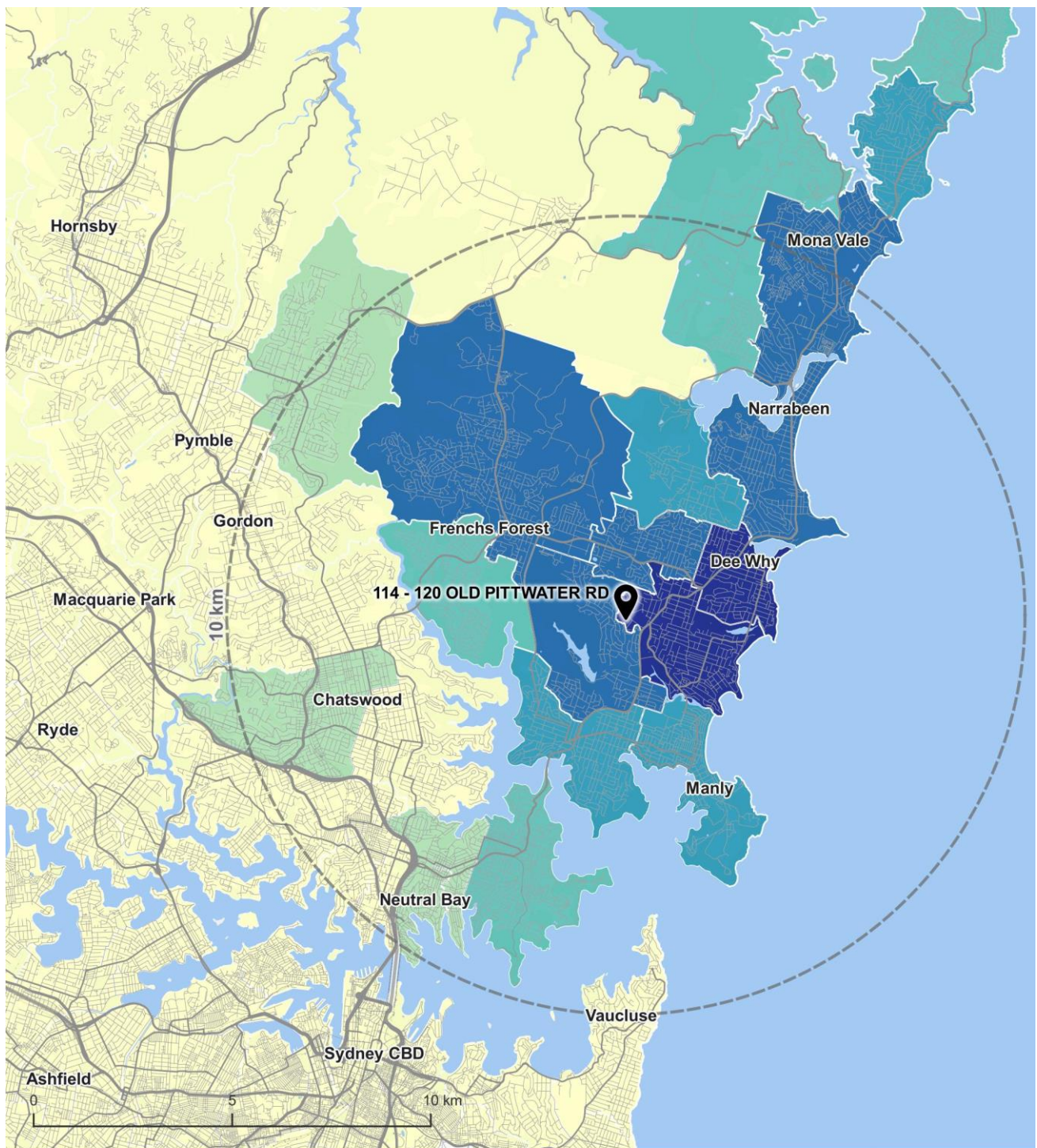
MAP 4.1. NORTHERN BEACHES LGA WHERE RESIDENTS WORK



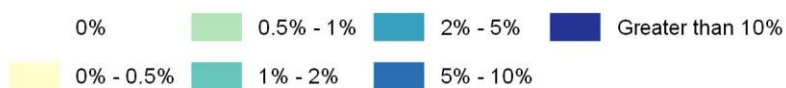
Northern Beaches LGA residents place of work (SA2)



MAP 4.2. FRESHWATER - BROOKVALE SA2 WHERE WORKERS RESIDE



Freshwater - Brookvale SA2 workers place of usual residence (SA2)



4.5. Net Community Benefits

- i. It is the conclusion of this report that a substantial net community benefit would result from the subject proposal for 114 - 120 Old Pittwater Road. The substantial positive benefits include the following:
 - Continued economic use of existing valuable assets on the subject site, being modern office buildings.
 - Catering to modern innovative businesses with support services in an industrial precinct which is transitioning from traditional manufacturing to advanced manufacturing and last mile delivery.
 - Assisting with the economic viability of the precinct with flexible planning options where friction can often be created (and vacant buildings eventuate) when significant changes are occurring in the industrial built form space.
 - Significant improvement in the range of employment opportunities that would be available to residents of Brookvale and surrounding areas. In total, some 1,373 additional jobs are likely to be created both directly and indirectly due to the planning proposal.
 - Assisting the Northern Beaches LGA to achieve the employment targets for Brookvale as set out in the Towards 2040 - Local Strategic Planning Statement. This involves accommodating some 3,000 - 6,000 additional jobs over the period to 2036. It is important to note that these additional jobs will result from no change in floorspace (GLA).
 - Improving the choice of tenants looking for larger office space within Brookvale. The commercial core zoning within Brookvale is predominately controlled by one land owner currently (Westfield Warringah Mall) meaning commercial floorspace is limited.
 - Reducing the need for local residents to travel further afield to their place of work (i.e. improved employment self sufficiency).
 - Additional customer flows created through increased labour intensities which would increase retail spending within Brookvale, positively impacting on the existing retail facilities and make more efficient use of infrastructure in the precinct.
 - Contributing to the overall growth of Brookvale in line with its planning designation in the North Sydney District Plan and the *Towards 2040 - Local Strategic Planning Statement*.
- ii. It is concluded that the combination of the substantial positive economic impacts will particularly benefit Brookvale and the surrounding communities. No significant economic negatives are envisioned from the subject proposal.

- iii. Business precincts such as that which accommodates the subject site are commonly major employment hubs, although, Brookvale is not currently a major employment destination as compared with similar precincts throughout Sydney.





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Appendix B Legal Opinion prepared by Holding Redlich



21 July 2020

Advice

Planning Proposal | 114-120 Old Pittwater Road, Brookvale

Confidential & Privileged

Advice to Primewest Funds

Sydney . Melbourne . Brisbane . Cairns

www.holdingredlich.com

Summary

Confidential & Privileged

Matter	Legal opinion regarding Planning Proposal for 114-120 Old Pittwater Road, Brookvale (Site)
Context	Primewest owns Site which comprises two existing industrial developments, both with substantial ancillary office space. Office uses are otherwise prohibited within the land use zone (IN1 General Industry) under the <i>Warringah Local Environmental Plan 2011 (WLEP 2011)</i> and the office space can therefore only be occupied in an ancillary nature to the industrial uses. Primewest is therefore looking to lodge a planning proposal to allow for an additional land use for the Site to be included in Schedule 1 to the WLEP 2011 (the Planning Proposal).
Scope	Our opinion has been sought in relation to the Planning Proposal in order to confirm that the Planning Proposal achieves its stated aims and objectives (including to protect existing industrial land) and does not set an undesirable precedent.
Summary	<ol style="list-style-type: none"> 1. The Planning Proposal protects the IN1 zone in the long term, consistent with the District Plan and Local Strategic Planning Statement because: <ol style="list-style-type: none"> (a) it does not propose to change the current zoning on the Site; (b) it limits the use of the surplus space to the existing buildings located on the Site (including by reference to a map); and (c) in the event that the Site is redeveloped, the clause will no longer apply. As such, it cannot be relied upon to support the construction of new office buildings in future. 2. It is also noted that the drafting is consistent with similar clauses in a number of other local environmental plans. 3. The Planning Proposal will not set an undesirable precedent for other sites within the IN1 zone. Being a Planning Proposal (rather than a development application, for example), there is no precedent set should this Planning Proposal be made. Any future planning proposal would need to be supported by Council having regard to the particular circumstances of the proposal and relevant policy objectives. Further, there are no appeal rights available to a proponent where Council does not support a planning proposal.

1. Context

This legal opinion has been prepared in support of the Planning Proposal in order to confirm that the Planning Proposal as drafted will achieve its intended outcomes such that Council can feel confident in making this Planning Proposal.

2. Background

- (a) Primewest owns a site at 114-120 Old Pittwater Road, Brookvale (**Site**). The Site comprises two existing industrial developments, both with substantial ancillary office space. Office uses are otherwise prohibited within the land use zone (IN1 General) under the *Warringah Local Environmental Plan 2011 (WLEP 2011)* and the office space can therefore only be occupied in an ancillary nature to the industrial uses.
- (b) Primewest is unable to lease the all of the office space, as the current industrial tenants have no requirement for the amount of office space that is available. This means a substantial amount of office floor space has been vacant for some time.
- (c) Primewest lodged a planning proposal in 2018 to include office premises as an additional permitted use under the WLEP 2011, which would enable them to lease the office space independently from the industrial uses (**2018 PP**). They later withdrew the 2018 PP at the request of Northern Beaches Council (**Council**) while the Brookvale Structure Plan was being finalised.
- (d) In recent discussions with Council, following adoption of the LSPS, concerns were raised that the 2018 PP was not consistent with the District Plan or Local Strategic Planning Statement (**LSPS**), specifically in terms of the protection of industrial zoned land. Council also suggested that the 2018 PP could set a precedent for other sites.
- (e) The Planning Proposal now seeks to amend Schedule 1 – Additional Permitted Uses to the WLEP 2011 to allow office uses on the Site. To address Council’s concerns with the 2018 PP however, some limitations are being proposed such that any standalone office use is:
 - (i) restricted to the existing buildings on site; and
 - (i) restricted to a total quantum of Gross Floor Area (**GFA**) (which represents the amount of ancillary office space currently on site).
- (f) The intended outcomes are that the Planning Proposal:
 - (i) protects the IN1 zone in the long term and is therefore consistent with the District Plan and LSPS;
 - (ii) enables Primewest to capitalise on their existing assets until such time as comprehensive redevelopment of the Site is warranted; and
 - (iii) gives Council comfort that once the site is redeveloped, office uses would cease to be an additional permitted use on the Site and will not set an undesirable precedent for other sites within the IN1 zone,

(Intended Outcomes).

- (g) This opinion considers Intended Outcomes (i) and (iii).

3. Detailed advice

3.1 Does the proposed wording protects the IN1 zone in the long term?

- (a) The proposed Additional Permitted Use clause for inclusion in Schedule 1 to the WLEP (**Proposed Clause**) is worded as follows:

24 Use of certain land at 114-120 Old Pittwater Road, Brookvale

- (1) *This clause applies to land in Lots 1 and 3 DP 868761 and Lot 3 DP 444776, 114-120 Old Pittwater Road, Brookvale identified as "Area 24" on the Additional Permitted Uses Map.*
- (2) *Use of that land identified as "Area 24" for office premises is permitted with development consent if the consent authority is satisfied that:*
- (i) *there will be no reduction in gross floor area available for industrial activities on any Lot,*
- (ii) *the development is carried out in an existing building, and*
- (ii) *no more than 11,317 sqm on Lot 1 DP 868761, and 4,340 sqm on Lot 3 DP 868761 and 3 DP 444776 of existing gross floor area will be used for office premises.*
- (b) The Proposed Clause will be accompanied by an amended Additional Permitted Uses Map-Sheet APU_008A. This will, like the extract of the map to the *Sydney Local Environmental Plan 2012 (SLEP 2012)*, show the outline/footprint of the existing building referred to in the Proposed Clause.
- (c) The drafting of the Proposed Clause, combined with clearly defining the area of the Site that is currently occupied by the existing building, will provide a robust approach which will achieve the Intended Outcomes and, in particular, ensure consistency with the District Plan and LSPS by protecting the IN1 zone in the long term. This is because:
- (i) the Proposed Clause makes it clear that the use is limited to only a specific area and within an existing building. As such, the clause could not be relied upon for any proposed new buildings; and
- (ii) the clause requires any proponent to satisfy Council (and for Council to be satisfied) that the requirements of the clause have been met before development consent will be granted (and, in fact, can be granted). As is clear from clause (2) of the Proposed Clause, this includes Council being satisfied that there will be no reduction in GFA available for industrial uses and that the development is being carried out within an existing building.
- (d) It is also noted that the suggested drafting for the Proposed Clause is consistent with and follows the drafting of similar clauses on other local environmental plans, including the *SLEP 2012*, the *Auburn Local Environmental Plan 2010 (ALEP 2010)* and the *Leichhardt Local Environmental Plan 2013 (LLEP 2013)*. All of these examples are attached to this legal opinion (**Attachment A**).

- (e) Further, we are aware of multiple other examples of additional uses applying to “existing buildings” in other local environmental plans including:
 - (i) clause ALU02 to Part 1 of Schedule 8 (Additional Land Uses) of the *Blue Mountains Local Environmental Plan 2005*;
 - (ii) Schedule 7 (Development for certain additional purposes) of the *Blue Mountains Local Environmental Plan No 4*;
 - (iii) clause 29 (Development for certain additional purposes) and items 7 and 42 to Schedule 8 (Land referred to in clause 29) to the *Byron Local Environmental Plan 1988*;
 - (iv) clause 63 (Development for certain additional purposes) and Schedule 4 (Development for certain additional purposes) to the *Kiama Local Environmental Plan 1996*, as applying to Lot 900, DP 616677, No 1 Fern Street, Gerringong; and
 - (v) Clause 27 to Schedule 1 to the *Liverpool Local Environmental Plan 2008*.

3.2 Will the Planning Proposal create a precedent?

- (a) We understand that Council has raised a question as to whether supporting the Planning Proposal may set an undesirable precedent within the local government area, noting the LSPS has only recently been adopted and Council's concern that the Planning Proposal may be inconsistent with this document. However, given the specific circumstances for this Site, the justifications provided and the proposed “restrictions” on the additional permitted use, the Planning Proposal does not set a precedent for other developments in the LGA.
- (b) Firstly, we note that the NSW Government Guide: A Guide to preparing planning proposals (**Guide**) outlines at section 2.3 the requirement for providing a justification for the planning proposal (Part 3). Section 2.3.1 of the Guide provides a number of questions to consider when providing the justification for the planning proposal.
- (c) We note that there is no specific question in the Guide relating to whether a planning proposal would set an undesirable precedent for existing land within that zone. However, this issue would likely come under the broad questions as to whether the Planning Proposal will give effect to the Council’s endorsed local strategic planning statement (Question 4 to the Guide). Of note, because the Planning Proposal is consistent with the Greater Sydney Plan, the District Plan and the LSPS (as it ensures that IN1 uses are protected), it is unclear how it could set an undesirable precedent for other land within the zone.
- (d) Furthermore, and in any event, we note that this is not a development application, which is assessed against specified planning controls and where there is risk that on appeal the Court may decide that planning controls have been eroded because of a previous decision made by Council. Rather, this is a Planning Proposal specific and unique to the Site. Council is required to consider whether there is merit and whether it is consistent with the various strategic plans that it has for the Site, the Precinct and the LGA before agreeing to progress the Planning Proposal.
- (e) There cannot be an undesirable precedent for other land within the zone, as each planning proposal application must be made and considered based on the particular facts and circumstances of the case and having regard to relevant strategic planning policies. Further, there is no statutory right of appeal or review for a proponent who requests that a council make a local environmental plan in respect of the proponent’s land. In such circumstances,

the only avenue of review is through the Pre-Gateway Review process where any proposal will need to meet both the Strategic Merit Test and the Site Specific Merit Test in order to proceed to Gateway. Accordingly, there is no precedent created by this Planning Proposal that could be relied upon and used against Council in any other planning proposal if Council is not minded to support another application.

Should you have any queries arising from the above, please don't hesitate to contact Breellen Warry, on (02) 8083 0420 or Breellen.Warry@holdingredlich.com.

Yours sincerely

A handwritten signature in blue ink that reads "Holding Redlich". The signature is written in a cursive, flowing style.

Holding Redlich

Contacts: Breellen Warry, Partner

Attachment A

ALEP 2010

1. Clause 5 of Schedule 1 to the ALEP 2010 states:

5 Use of certain land at 108 Silverwater Road, Silverwater

(1) This clause applies to Lot 100, DP 1199035, 108 Silverwater Road, Silverwater identified as "5" on the Additional Permitted Uses Map.

(2) Development for the purpose of office premises is permitted with development consent if—

(a) the development is carried out in an existing building, and

(b) the gross floor area of that building, immediately before the commencement of this clause, is not less than 2,000m².

2. The map shows the whole of the lot identified as "5" on the Additional Permitted Uses Map to the ALEP 2010.

LLEP 2013

3. Clause 6A of Schedule 1 to the LLEP 2013 states:

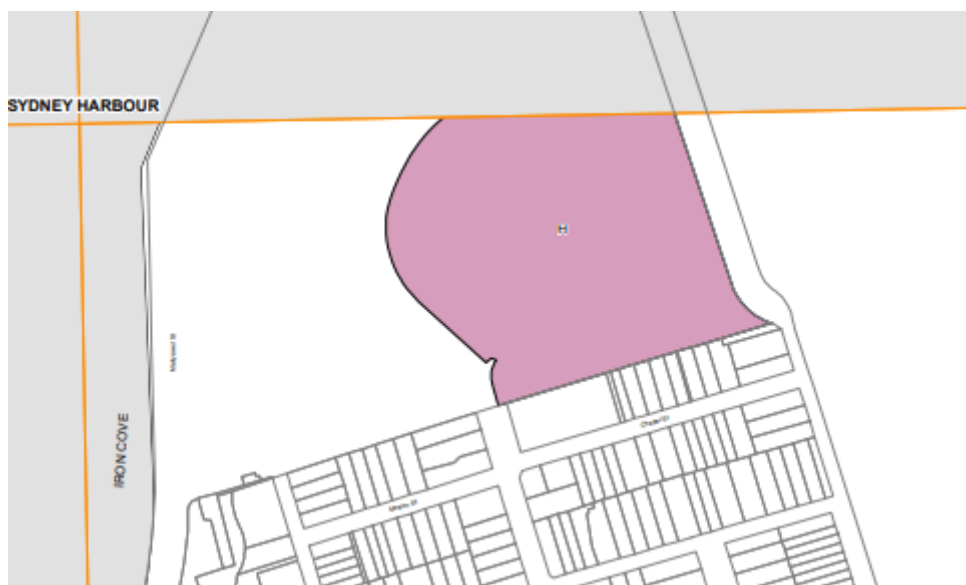
6A Use of certain land at 43 Mary Street, Lilyfield

(1) This clause applies to land identified as "H" on the Additional Permitted Uses Map, being part of Lot 6643, DP 1137663.

(2) Development for the purpose of a function centre is permitted with development consent if the development will be located within an existing building.

(3) In this clause, an existing building includes a proposed building that has been granted development consent.

4. An extract of LLEP 2013 Additional Permitted Uses Map – Sheet APU_004 that shows the land identified as "H" in clause 6A of Schedule 1 is shown below.



SLEP

5. Clause 1 to Schedule 1 to the SLEP 2012 provides:

1 Use of certain land at The Domain, Sydney

(1) This clause applies to land in Zone RE1 Public Recreation at The Domain, Sydney, being Part Lot 101, DP 854472, as shown edged heavy red and marked “(i)” on the Locality and Site Identification Map.

(2) Development for any of the following purposes is permitted with development consent—

- (a) car parks,*
- (b) food and drink premises,*
- (c) information and education facilities,*
- (d) passenger transport facilities,*
- (e) retail premises.*

6. An extract of Locality and Site Identification Map Foreshore Building Line Map – Sheet CL 1_014 which shows the part of the lot shown edged heavy red and marked “(i)” is provided below:



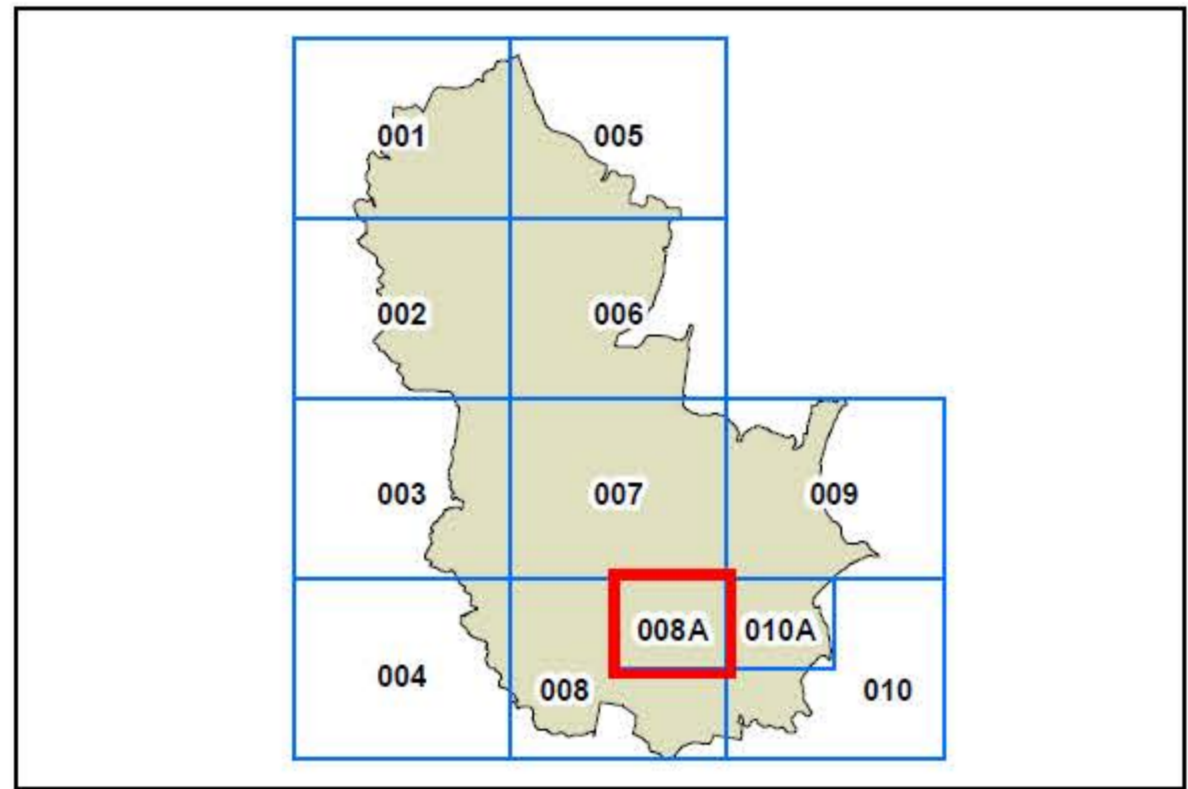
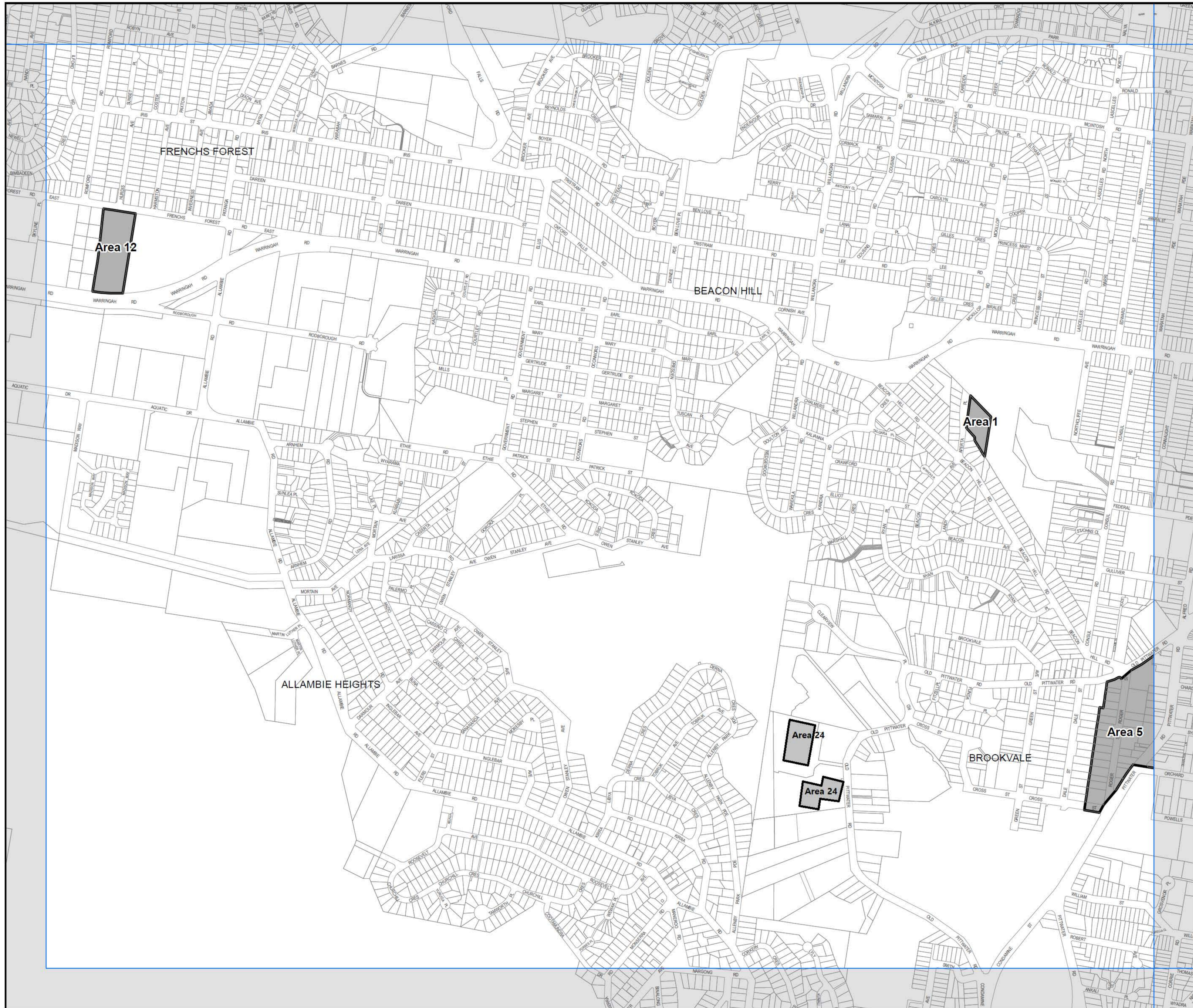
C Proposed Mapping



Warringah Local Environmental Plan 2011

Additional Permitted Uses Map - Sheet APU_008A

 Additional Permitted Uses
 Cadastre
 Cadastre 24/09/2012 © Warringah Council



0 200 Metres

Scale: 1:10,000 @ A3

Projection: GDA 1994
 Zone 56
 Map identification number: 1800_COM_APU_008A_010_20120924



Appendix D Ministerial Directions (s 9.1)

Direction	Consistency	Discussion
1. Employment and Resources		
1.1 Business and Industrial Zones	Yes	<p>The proposal is wholly consistent with this direction which states that a planning proposal must:</p> <p><i>(a) give effect to the objectives of this direction</i></p> <p>The planning proposal is consistent with the objectives of the direction because it will:</p> <ul style="list-style-type: none">• Encourage employment in an identified strategic employment centre (Brookvale) and will support its viability as an employment hub in the Northern Beaches.• Protect the industrial zone of the site, which will not change <p><i>(b) retain the areas and locations of existing business and industrial zones</i></p> <p>There will be no change to the existing area, location or extent of the industrial zone.</p> <p><i>(c) not reduce the total potential floor space area for employment uses and related public services in business zones</i></p> <p>There will be no change in potential floor space area for employment uses.</p> <p><i>(d) not reduce the total potential floor space area for industrial uses in industrial zones, and</i></p> <p>The planning proposal is seeking amendments that would allow existing ancillary office space to be occupied independently of the manufacturing uses. This would only be permitted within existing buildings and current GFAs. The proposed amendment specifically states that no reduction in GFA for industrial uses may occur. If the site is redeveloped in the future, the amendment would cease to apply.</p>



Direction	Consistency	Discussion
		<i>(e) ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment</i> Not applicable.
1.2 Rural Zones	n/a	
1.3 Mining, Petroleum Production and Extractive Industries	n/a	
1.4 Oyster Aquaculture	n/a	
1.5 Rural Lands	n/a	
2. Environment and Heritage		
2.1 Environment Protection Zones	n/a	
2.2 Coastal Management	n/a	
2.3 Heritage Conservation	n/a	
2.4 Recreation Vehicle Areas	n/a	
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	n/a	
2.6 Remediation of Contaminated Land	n/a	
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones	n/a	
3.2 Caravan Parks and Manufactured Home Estates	n/a	
3.3 Home Occupations	n/a	



Direction	Consistency	Discussion
3.4 Integrating Land Use and Transport	Yes	The planning proposal demonstrates consistency with this direction in accordance with clause 5(c) and 5(d). It will facilitate occupation of existing office space in an employment centre with good access to public transport. While the planning proposal is considered to be of minor significance in the context of this direction (5(d)) it is also in accordance with the Greater Sydney and North District Plans.
3.5 Development Near Regulated Airports and Defence Airfields	n/a	
3.6 Shooting Ranges	n/a	
3.7 Reduction in non-hosted short term rental accommodation period	n/a	
4. Hazard and Risk		
4.1 Acid Sulfate Soils	n/a	
4.2 Mine Subsidence and Unstable Land	n/a	
4.3 Flood Prone Land	n/a	
4.4 Planning for Bushfire Protection	Yes	The planning proposal will not facilitate additional development on the site, or result in an intensification of already approved uses. It will not result in an increased bushfire risk.
5. Regional Planning		
5.1 Implementation of Regional Strategies	n/a	
5.2 Sydney Drinking Water Catchments	n/a	
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	n/a	



Direction	Consistency	Discussion
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	n/a	
5.5 Development in the vicinity of Ellalong, Paxton and Millfield (Cessnock LGA) (Revoked 18 June 2010)	n/a	
5.9 North West Rail Link Corridor Strategy	n/a	
5.10 Implementation of Regional Plans	n/a	
5.11 Development of Aboriginal Land Council land	n/a	
6. Local Plan Making		
6.1 Approval and Referral Requirements	Yes	This planning proposal is consistent with this Direction in that it does not introduce any provisions that require any additional concurrence, consultation or referral.
6.2 Reserving Land for Public Purposes	Yes	This planning proposal is consistent with this Direction in that it does not create, alter or reduce existing zonings or reservations of land for public purposes.
6.3 Site Specific Provisions	Yes	The planning proposal is introducing site specific planning controls for 114-120 Old Pittwater Road. These controls are considered necessary to ensure the planning proposal complies with the relevant State, Regional and Local strategies. They will apply only for the duration of existing buildings on site and are therefore not considered unnecessarily restrictive. The amendments are minor in nature.
7. Metropolitan Planning		
7.1 Implementation of A Plan for Growing Sydney	Yes	As demonstrated in Section 4.4.2, the planning proposal is consistent with the relevant regional plan.
7.2 Implementation of Greater Macarthur Land Release Investigation	n/a	



Direction	Consistency	Discussion
7.3 Parramatta Road Corridor Urban Transformation Strategy	n/a	
7.4 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	n/a	
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	n/a	
7.6 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	n/a	
7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor	n/a	
7.8 Implementation of Western Sydney Aerotropolis Interim Land Use and Infrastructure Implementation Plan	n/a	
7.9 Implementation of Bayside West Precincts 2036 Plan	n/a	
7.10 Implementation of Planning Principles for the Cooks Cove Precinct	n/a	