

CAMDEN COUNCIL PLANNING PROPOSAL

Amendment to State Environmental Planning Policy (Sydney Region Growth Centres) 2006 in relation to Turner Road Employment Lands

November 2011

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Introduction

The Turner Road Employment Lands are situated within the Camden LGA 7km northeast of Camden, 20km southwest of the Liverpool CBD and 50km southwest of the Sydney CBD. The industrial area of Smeaton Grange is located to the south, with the Narellan Town Centre being 3km to the southwest and the future Oran Park Town Centre 3km to the northwest. The future regional centre of Leppington is approximately 7.5km to the north.

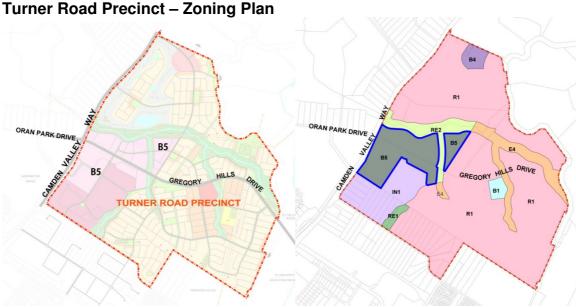
Camden Valley Way forms the northwest boundary and Gregory Hills Drive traverses the B5 zoned area. South Creek forms the northeast boundary with future residential and industrial development planned to the east and south respectively.

The B5 area is well located with existing and future activity centres and the new residential development of the South West Growth Centre.

The Turner Road Precinct was zoned in December 2007 to facilitate the coordinated growth of housing and employment in the region with the target of creating 5,000 new jobs.

Source: Sydney's Growth Centres website www.gcc.nsw.gov.au

The subject land is approximately 50ha in area and is zoned 'B5 Business Development', which provides a range of business, large-format retail, warehousing and light industrial activities within the Turner Road Employment Lands area, which is in two consolidated landholdings of approximately 25ha each.



Source: Sydney's Growth Centres website www.gcc.nsw.gov.au

A landowner and active developer of the B5 area has already funded and upgraded sections of Camden Valley Way and delivered the first section of Gregory Hills Drive. Further, there is a Voluntary Planning Agreement to deliver the remainder of this important link to Campbelltown and regional public transport and road infrastructure. This future link will also become an important strategic public transport corridor with its connectivity to the Campbelltown Railway Station.

The B5 area comprises two consolidated landholdings that are separated by Gregory Hills Drive. This enables each holding to be developed individually but in a coordinated manner. Furthermore, each holding has excellent connectivity to the major regional road network through frontage to Gregory Hills Drive.

Development of the B5 land has commenced with the subdivision works (allotments, roads, servicing infrastructure, etc.) for the 25ha of B5 area south of Gregory Hills Drive being constructed and ready to accommodate built form development, including the establishment of bulky goods activities. In addition, the erection of buildings has now commenced with the first employment generating development, a Masters Home Improvement store, due to open in December 2011.

As part of the Precinct Planning process that concluded with establishing statutory planning provisions and rezoning in 2007, a limit on bulky goods retail floorspace of 40,000m² was applied to the B5 area of the Turner Road Employment Lands.

Since the finalisation of the zoning and statutory planning framework for the Turner Road Precinct, NSW Government policy has evolved towards promoting economic competition in the retail sector. This was initiated by findings and recommendations from the Australian Competition and Consumer Commission (ACCC) and

Productivity Commission. Through the Department of Planning and Infrastructure, the NSW Government has undertaken extensive stakeholder consultation, and prepared draft policies and draft planning instruments that are intended to promote economic growth and competition through the planning system. Whilst no policies or planning instruments have been finalised, there is greater clarity on how the planning framework is to be structured to facilitate the economic and competition objectives.

In light of the developments relating to economic growth and competition, this Planning Proposal seeks to remove the limitation on bulky goods floorspace that currently applies to the B5 area of the Turner Road Precinct.

Specific assessment of bulky goods retailing within the immediate catchment of the Turner Road Employment Lands and the broader South West Sydney Region has been undertaken to support this proposal. Most importantly, this assessment includes a demand analysis for bulky goods retailing, which considers current and future demand drivers relating to the B5 land in South West Sydney. The assessment reinforces the suitability of the B5 land, which is 50% constructed, to accommodate the existing and future demands for bulky goods development.

The findings of this analysis combined with the new developments in NSW Government economic growth and competition policies, and its consistency with existing State and local strategic planning directions, form the basis for this Planning Proposal.

It should also be noted that Council has received a request to rezone 'B5 – Business Support' land at Narellan, known as the 'triangle' site owned by Landturn Pty Ltd. If that Planning Proposal proceeds the land will be rezoned to 'B2 – Local Centre' to facilitate an expansion to the Narellan Town Shopping Centre and will displace the bulky goods retailing that was to occur on the site.

Part 1 – Objectives or Intended Outcomes

The subject land is zoned B5 under Appendix 1 of State Environmental Planning Policy (Sydney Region Growth Centres) 2006. Appendix 1 includes the statutory planning provisions for the Oran Park and Turner Road Precincts of the South West Growth Centre.

In addition to the standard zoning provisions for the B5 zoned land within Turner Road Employment Lands, Appendix 1 includes a clause that applies an additional 'Principal Development Standard' that limits the total area that can be used for bulky goods to $40,000\text{m}^2$. Furthermore, the Turner Road Development Control Plan restates the $40,000\text{m}^2$ limitation for total gross floor area for all bulky goods premises. It also apportions the total maximum floor area requirement by allocating $20,000\text{m}^2$ to the north of Gregory Hills Drive (formerly Badgally Road as referred to in the DCP) and the remaining $20,000\text{m}^2$ to the south.

The intended outcome is to promote economic growth, employment generation, and greater flexibility in land use activities within the Turner Road Employment Lands, and to achieve a more competitive economic environment for bulky goods

development throughout South West Sydney. In addition, it is intended to enable the Turner Road Employment Lands to make a stronger contribution to fulfilling identified existing and future shortfalls of suitable land for bulky goods development in South West Sydney.

The primary objective of this Planning Proposal is to remove the floorspace restrictions for bulky goods development within the Turner Road Precinct. Furthermore, it is to remove the floorspace limit to allow the B5 area to develop complementary commercial uses to other existing and/or future commercial centres within the South West Sydney Region.

Part 2 – Explanation of Provisions

The objectives of this Planning Proposal are to be achieved by deleting Clause 41.D of 'Appendix 1 Oran Park and Turner Road Precinct Plan' of *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (Growth Centres SEPP).

Clause 4.1D Bulky goods premises in Appendix 1 of the Growth Centres SEPP reads as follows:

4.1D Bulky goods premises

The total area used for the purposes of bulky goods premises on all land within Zone B5 Business Development must not exceed 40,000m².

In addition to deletion of Clause 41.D, amendment to the Turner Road Development Control Plan will be necessary following Gateway approval, as the Development Control Plan replicates the floorspace limit for bulky goods premises.

Accordingly, a summary of the sections of the DCP requiring amendment include:

Part A Precinct Wide DCP

Table 1 in Section 2.5 Hierarchy of Centres and Employment Areas.

For the Turner Road Business Development Area, delete "The maximum aggregate of bulky good premises (not including landscape and garden supplies and timber and building supplies) is 40,000m² GFA".

Part B Site Specific DCPs - Controls for the Turner Road Employment Area

• Delete Clause 5 under 'Controls' in Section 3.1 Land Uses, which states "A total maximum of 40,000m² of GFA of bulky goods premises is to be provided in the Business Development Lands fronting Badgally Road. Of this maximum, no more than 20,000m² is to be provided along either the northern or southern frontages of Badgally Road".

Part 3 – Justification

Section A - Need for the planning proposal.

1. Is the planning proposal a result of any strategic study or report?

The proposal has not been the result of a specific strategic study or report. However, a bulky goods assessment that specifically considers the demand and supply for existing and future bulky goods floorspace for the subject land and South West Sydney has been prepared by Deep End Services Pty Ltd (provided in **Appendix 1**) to support the Planning Proposal. This assessment has been peer reviewed by Hill PDA on behalf of Council (provided in **Appendix 2**).

The Bulky Goods Analysis is a comprehensive examination and assessment of the provision of bulky goods floorspace in the South West Sydney context with specific relevance to the B5 area in the Turner Road Precinct. The analysis confirms there is a significant existing and future supply shortage for bulky goods development in the locality and that the B5 area within the Turner Road Precinct is the preferred identifiable and suitable location to provide bulky goods development.

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

Yes. The planning proposal is the most appropriate method to enable the floorspace restriction on bulky goods to be removed.

The existing floorspace limitation on bulky goods development is a site specific, mandatory planning control under a Environmental Planning Instrument. This requirement is therefore a high-order statutory control that is to be complied with by any consent authority considering a proposal for bulky good development, and there is minimal scope to vary this requirement. Furthermore, the proposed amendment is the only means that will provide the level of certainty required to encourage long term investment in the Turner Road Employment Lands.

3. Is there a net community benefit?

Yes. A Net Community Benefit analysis is included in **Appendix 3**. The analysis has been adapted from the Draft Centres Policy (April 2009). In some cases the Evaluation Criteria have been modified or removed to ensure the criteria are meaningful to this Planning Proposal.

There is a significant net community benefit resulting from the Planning Proposal, particularly as it will provide a more competitive marketplace for consumers and increase localised employment opportunities for the existing and planned future population of the South West. With the more localised employment, local residents will have more opportunities to secure jobs close to their homes instead of travelling outside the South West Region for work,

such as the Sydney CBD. Less work related travel time results in more time to spend with families and it will also have a positive effect on reducing greenhouse gas emissions produce by commuting to work. In addition, local residents will have greater choice in bulky goods to be offered in the Turner Road Employment Lands.

Section B - Relationship to strategic planning framework.

4. Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?

Yes.

Metropolitan Plan for Sydney 2036

The Metropolitan Plan aims to grow employment in Sydney by 760,000 jobs by 2036. The job target for South West Sydney is to grow employment by 106% by 2036, which equates to an additional 141,000 jobs in the next 25 years. This sets a significant increase in employment growth and presents a considerable challenge to create new jobs in the South West, particularly as the other subregions of Sydney have lower targets of 55% employment growth or less.

In respect to South West Sydney's job targets, almost half the growth is to occur in 'strategic centres' (i.e Liverpool, Leppington and Campbelltown Macarthur) (P135). This therefore means that there needs to be significant job growth outside the 'strategic centres'. In addition to the employment growth objectives for South West Sydney, 'Action E5.1 - plan for half of Sydney's new employment by 2036 to be in western Sydney by facilitating growth in Strategic centres and development of greenfield employment land' emphasises the need to grow employment in Western Sydney. The effects of removing the floorspace limitation will assist in achieving the Metropolitan Plan's strategic actions for employment by increasing capacity for job growth in a region that has been allocated the largest growth target throughout Sydney.

More specific to this proposed amendment, the Metropolitan Plan encourages the clustering of businesses in appropriate locations to create more competitive markets. In addition, 'Objective B1 – To Focus Activities in Accessible Centres' articulates the general strategy for bulky goods development throughout Sydney. Under this objective the Plan states the following in relation to bulky goods development:

Retailing which requires large floor areas, such as bulky goods premises, cannot always be readily accommodated in existing centres. Subregional planning and local planning will need to identify locations for subregional clusters for this kind of retail development which

support the economic development of centres in those subregions. The B5 Business Development Zone is generally an appropriate zone in which to cluster this kind of development. (P62 Metropolitan Plan for Sydney 2036)

The proposed amendment is consistent with the Metropolitan Plan as lifting the limitation on bulky goods will enable bulky goods business to cluster within a location that is identified as being eminently suitable for this form of development. In addition, the B5 area is well serviced with infrastructure and transport, and removal of the floorspace limitation will increase the potential for greater employment and competition.

Draft South West Subregional Strategy

Now that the new Metropolitan Plan is in place, the released Draft South West Subregional Strategy is being reviewed. The Metropolitan Plan states that the Subregional Strategies will be instrumental in defining the growth directions of Sydney in greater detail.

Notwithstanding the current status of the strategy, the relevant key objectives in the publicly exhibited Draft South West Subregional Strategy include:

- Accommodating employment needs of existing and future communities.
- Planning for major employment growth.
- Councils to plan for sufficient zoned land to accommodate their employment targets.

The Planning Proposal will create increases in the level of bulky good retail which is a use that will generate some of the higher rates of employment per floor area metre out of the various permitted land uses in the B5 zone. The proposal will therefore make a strong contribution towards Council achieving its employment targets and will facilitate greater competition within the local commercial centres.

South West Growth Centre

The subject land is located within the South West Growth Centre, which incorporates a strategic planning framework to guide the location of residential, business, industrial and recreational land uses. The South West Growth Centre Structure Plan identifies a network of centres at various levels in the centres hierarchy, which includes the nearby Oran Park Town Centre and the future Leppington Regional Centre.

As part of the Precinct Planning process for the Turner Road Precinct, detailed background assessments were undertaken to substantiate how the Precinct should be developed. This included detailed assessments on the economics and employment of the Turner Road Employment Lands and Oran Park Town Centre, and their context with the Leppington Regional Centre.

Outcomes of the economic and employment analysis reinforced the Oran Park Town Centre as a traditional retail centre rather than having a bulky goods retail function. In addition, the studies supported a more concentrated approach to commercial development (i.e. bulky goods retail) rather than the 'ribbon style' commercial development along arterial roads where direct access cannot be achieved.

As determined by the Precinct Planning process, the subject land is a suitable location for bulky goods retail development which will not impact on the integrity of surrounding centres. Furthermore, the subject land is the only identified location within the South West Growth Centre that has undergone detailed planning to confirm its suitability for bulky goods retail development. In a broader context, the subject land is an identified bulky goods centre in the Turner Road catchment, which has limited sites that have been identified or are suitable for this type of land use activity.

5. Is the planning proposal consistent with the local Council's Community Strategic Plan, or other local strategic plan?

Camden Council's local strategic plan is 'Camden 2040 - Working Together to Achieve the Community's Vision for the Future' was endorsed in December 2010.

Camden 2040 has a vision to effectively manage its growth whilst promoting a prosperous local economy, with thriving local businesses and local employment. Part of successfully managing growth is to overcome a key challenge of "developing a local economy that enables local people to prosper and contributes to improved lifestyles, including strong local businesses and availability of local employment" (p22) by building "a strong local and regional economy that is characterised by the provision of local jobs for local people" (p25).

The specific key challenges for a prosperous local economy include:

- The increasing gap between the number of residents and the availability of jobs within the region.
- Building a good skills match between jobs and residents in Camden and the Macarthur region through developing an increasing diversity of local skills, attracting people with diverse skills to live in this area, and through a focus on young people as the future labour force.

The key strategies need to overcome the above challenges include:

- Planning for local economic development activities that maximise opportunities and actively grow the local economy, having a clear understanding of the local, regional and national economic contexts.
- Attracting industry and business investment in the Camden and Macarthur regions through marketing and promotion of the region as an attractive and viable location for business and industry, and for the people employed in those organisations.

 Providing suitable and sufficient land through the urban planning process to enable and support a diversity of employment and industry types, including planning for economic development clusters or "hubs" that will maximise opportunities to build competitive advantage and strengths.

The measure for success of the above strategies will be represented by the diversity and level of local employment opportunities within the local government area. This proposal will undoubtedly contribute to Council achieving its vision for economic and employment growth for the local community.

6. Is the planning proposal consistent with applicable state environmental planning policies?

The State Environmental Planning Policies (SEPPs) that are relevant to this Planning Proposal are identified below.

Relevant SEPP/Deemed SEPP	Consistency of Planning Proposal
SEPP (Sydney Region Growth Centres) 2006	The proposal is consistent with the aims of the SEPP to coordinate the release of land for employment generation in the in the South West Growth Centre.
SREP No 20—Hawkesbury- Nepean River	While the proposed amendment will result in increases to bulky goods retail development within the area, there are no inconsistencies with SREP No 20. The proposed amendment is not likely to change the nature of the development within the Turner Road Employment Lands area.

7. Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?

Each s117 Ministerial Direction is listed below with an annotation stating whether it is relevant to the Planning Proposal and confirming its consistency.

s.117 Direction	Consistency of Planning Proposal
1.1 Business and Industrial Zones	Yes. The proposal will have a positive effect on an area that has been identified for business purposes. This is demonstrated not only by retaining all existing development potential for business
	development, but increasing the opportunities for business development and creating a more flexible economic environment for growth.

s.117 Direction	Consistency of Planning Proposal
	In addition, the proposed amendment will not adversely impact on existing and future centres in the region, which is large due the low levels of bulky goods development either existing or planning within the commercial catchment.
3.4 Integrating Land Use and transport	Yes. Constructed and future road infrastructure within the site will be suitable for bus routes and the subject land fronts Camden Valley Way and Gregory Hills Drive, which are identified as strategic regional bus routes in the Bus Route Strategy for the South West Growth Centre. In addition, pedestrian/cycle paths will be provided in accordance with the Precinct Planning outcomes for the Turner Road Precinct, which will ensure the B5 area is highly connected with surrounding non-vehicular transport networks.
6.3 Site Specific Provisions	Yes. The objective of this direction is to discourage unnecessarily restrictive site specific planning controls. The proposal will remove existing site specific controls that apply a limit to a specific land use activity that is typically permitted within the B5 zone.
7.1 Implementation of the Metropolitan Strategy	Yes. It meets objectives of the Metropolitan Strategy through facilitating economic growth within an identified employment lands area as detailed in the Sydney Metropolitan Strategy Map.

Section C - Environmental, social and economic impact.

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

The Planning Proposal will not result in any adverse environmental impacts.

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

The Planning Proposal will not result in any adverse environmental impacts.

10. How has the planning proposal adequately addressed any social and economic effects?

Any social and economic effects are expected to be positive. Assessment of the economic and social impacts for urbanisation of the Turner Road Precinct was undertaken as part of the comprehensive Precinct Planning process. This included investigations to determine social infrastructure for the employment lands and the adjacent residential lands. Development that is likely to result from the proposed removal of the cap on bulky goods development is not expected to significantly impact on the nature of development that would otherwise occur under the current statutory planning framework. However, it is expected that employment generation will be higher from the proposed amendment as bulky goods development has a significantly higher employment rate than other uses permitted within the B5 zone, such as warehousing and distribution activities. Furthermore, with the removal for the floorspace restriction, this will encourage a diverse bulky goods centre that will bring early employment opportunities to the locality.

Section D - State and Commonwealth interests.

11. Is there adequate public infrastructure for the planning proposal?

The subject B5 zoned land is within a major urban growth area of South West Sydney. Comprehensive assessment of public infrastructure needs has been undertaken at the Precinct Planning stages of the Turner Road Precinct to ensure adequate public infrastructure is provided and coordinated with land development in a timely manner.

The landowners/developers associated with the B5 area of the Turner Road Precinct have funded the delivery of major road upgrades, the provision of new water and sewer infrastructure, and the constructed portion of the Turner Road Employment Lands is serviced with fibre optic cable technology.

The Planning Proposal does not alter the nature of potential development within the Turner Road Employment Lands, and therefore, no additional needs for public infrastructure for the locality is anticipated.

12. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

The applicant has undertaken initial consultation with Department of Planning and Infrastructure to ensure that the 'Turner Road Precinct Bulky Goods Analysis' (refer to **Attachment 1**) has addressed all issues of interest and relevance to the Department. No wider consultation with State or Commonwealth agencies has been undertaken at this stage.

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Part 4 – Community Consultation

Should a Gateway Determination be received that supports proceeding with the planning proposal, Council will consult with the community via a public exhibition of the planning proposal and DCP amendment. It is recommended that the Planning Proposal be publicly exhibited for a period of 28 days.

Appendix 1 'Turner Road Precinct Bulky Goods Analysis' by Deep End Services, October 2011 Appendix 2 Hill PDA peer review report November 2011

Appendix 3: Net Community Benefit Test

Response
Yes, the proposal is consistent with recent developments in NSW Government policy to encourage economic growth and competition through the planning system.
The B5 zoned land forms part of an NSW Government identified urban growth area for employment lands development over a 25 to 30 year period. The land subject to this proposal has been specifically identified for employment generation to provide localised employment for the future residents of the South West Growth Centre. The site is also highly accessible to public transport, as Gregory Hills Drive will provide a direct public transport link to Campbelltown station for the southern portion of the South West Growth Centre.
The subject site is located within an area covered by the Sydney Metropolitan Strategy and the Draft South West Sub-Regional Strategy for Sydney. These documents identify the subject land as 'Existing Urban Area' and 'New Release Area' respectively. In addition, the area applicable to this planning proposal has been nominated for employment lands development under the Sydney's Growth Centres program for coordinated urban growth. Accordingly, the proposal is consistent with the strategic directions detailed in the regional and subregional strategies for the locality.
The Planning Proposal is in accordance the standardised planning provisions applicable throughout NSW. The B5 zone is identified as being the most suitable zone for bulky goods development and the land subject to this proposal is identified for bulky goods development Accordingly, the proposal is consistent with State and regional planning provisions, and therefore, it is not likely to set an undesirable precedent. A Precinct in North West Growth Centre (Marsden Park Industrial) was recently rezoned for similar employment generating purposes without any floorspace limitation on bulky goods premises. In addition, the exhibited documentation for the Austral/Leppington North release areas in the South West Growth Centre identify land for bulky goods development without a limitation on bulky goods floorspace.
The proposal will facilitate a more flexible and certain commercial environment for bulky goods development and will maximise the potential to expand employment generating activities in the bulky goods sector. This will result in increased generating capacity for permanent employment,

Net Community Benefit Evaluation Criteria	Response
,	and therefore, there will be no loss or adverse impact on the employment lands.
Will the LEP impact upon the supply of residential land and therefore housing supply and affordability?	The proposal does not affect the supply of residential land or bear any direct impact on residential land. The planning proposal will assist in stimulating job growth which should increase demands for local housing as business and employment grows in the South West Growth Centre and broader region.
Is the existing public infrastructure (roads, rail, utilities) capable of servicing the proposed site? Is there good pedestrian and cycling access? Is public transport currently available or is there infrastructure capacity to support future public transport?	The subject site is within a major urban growth area of Sydney, which has been comprehensively planned to provide coordinated and integrated public infrastructure requirements. The Turner Road Precinct of the South West Growth Centre was assessed for key infrastructure requirements as part of the comprehensive Precinct Planning processes.
	The planned provision of infrastructure includes major road upgrades and essential public infrastructure services, which includes a direct bus route from the South West Growth Centre to Campbelltown Station. The Department of Transport is advancing the provision of the bus services for the Precinct, which are expected to commence in mid-2012. In addition, an extensive public accessible cycling and pedestrian pathway network is planned throughout the Precinct and surrounding areas.
	It is noted that major upgrades to Camden Valley Way and the construction of a new sub-arterial road, Gregory Hills Drive, have been delivered under the Special Infrastructure Contribution framework. This means that landowners and developers in the Turner Road Precinct have undertaken the works on behalf of NSW Government agencies to ensure the early delivery of essential public infrastructure. In addition, the section of Camden Valley Way to the south of the subject land, which connects with the Narellan Town Centre, is scheduled to be completed in early 2012. These upgrades provide sufficient capacity to accommodate traffic demands resulting from this proposal.
	The proposal is not expected to create an increased demand for infrastructure and there is adequate public infrastructure to accommodate the planned future development of the subject employment lands.
Will the proposal result in changes to the car distances travelled by customers, employees and suppliers? If so, what are the likely impacts in terms of greenhouse gas emissions, operating costs and road safety?	The proposal will encourage the early delivery of localised employment and a more diverse range of jobs for the B5 area of the Turner Road Employment Lands. This will increase the opportunities for shorter work travel distances for

Net Community Benefit Evaluation Criteria	Response
	local residents. Furthermore, it will create shorter trips for customers and local suppliers that currently need to travel to bulky goods stores outside the catchment. In addition, with the established shortage of bulky goods development within the Turner Road catchment, there are high levels of travel for residents obtaining bulky goods from outlets in neighbouring catchments, which are forecast to grow substantially if the shortfall is not addressed. Accordingly, the provision of more capacity for bulky goods development under this proposal will significantly reduce car travel in the future.
	In light of the above, there will be a positive effect on greenhouse gas emissions and road safety issues due to significantly shorter travel distances and times.
Are there significant Government investments in infrastructure or services in the area whose patronage will be affected by the proposal? If so, what is the expected impact?	There are significant Government investments in infrastructure for the locality. However, any potential increases in patronage resulting from the proposal are not expected to have an adverse impact. The B5 area is highly accessible to the regional road network, which has been designed to accommodate substantial increases in traffic into the future with due consideration of future land use activities associated with the Turner Road Employment Lands. In addition, no increased demand on essential services infrastructure is anticipated given there will be no significance changes to the nature of development that is already permitted on the subject land.
Will the proposal impact on land that the Government has identified a need to protect (e.g. land with high biodiversity values) or have other environmental impacts? Is the land constrained by environmental factors such as flooding?	The proposal does not relate to land that has been identified by the NSW Government for conservation or affected by environmental considerations and constraints.
Will the LEP be compatible/complementary with surrounding land uses? What is the impact on amenity in the location and wider community? Will the public domain improve?	The proposal is compatible and desirably complementary with adjacent land uses, which includes industrial, residential and riparian lands. The proposal does not alter the nature of development that would already be allowed within the B5 area. In addition, there will be no impacts on amenity or the broader community, and a high quality public domain area of Turner Road Employment Lands will be maintained.
Will the proposal increase choice and competition by increasing the number of retail and commercial premises operating in the area?	The proposal will facilitate significant increases in choice and competition. The proposal will remove existing barriers that will enable various bulky goods retailers to commit investment and cluster similar activities in a single location in accordance with market demands. Furthermore, increases in bulky goods outlets will drive greater competition and choice for the local community.

Net Community Benefit Evaluation Criteria

What are the public interest reasons for preparing the draft plan? What are the implications of not proceeding at that time?

Response

There are four main public interest reasons for progressing the Planning Proposal, including:

- It will result in greater opportunities for bulky goods development that will increase competition in the marketplace, which will result in increased consumer choice at more competitive prices.
- It will ensure shorter travel distances for local residents seeking to purchase a wider range of bulky goods products.
- 3. It has potential to deliver earlier employment opportunities for existing and local residents as it will provide certainty for commercial investment in bulky goods development.
- 4. It will encourage increase employment opportunities for local residents by promoting commercial activities that typically generate the higher rates of employment than other permitted developments in the B5 zone (i.e. warehousing and distribution).

The implications of not proceeding with this proposal will have a negative impact on economic and employment growth in a major urban growth corridor of the South West Growth Centre. This will largely be due to the floorspace limitation adversely impacting on attracting early investment within the Turner Road Employment Lands and the delivery of a commercial activity that has significantly higher employment rates in comparison to other uses permitted within the B5 zone. The other implication relates to not being able to fulfil an established undersupply of suitable land for bulky goods development to service existing and new residents in the locality.