

1 Crescent Street, Holroyd – Planning Proposal

Review of “Draft West Central District Plan 2016” and
“Parramatta Road Urban Transformation Strategy
2016” –December 2016 (Strategies)

This document should be read in conjunction with the summary presentation dated 6
December 2016.



CONTENTS

Annexure A - Mod Urban Planning Response to Strategies

Annexure B - Traffic and Transport Response

Annexure C - Macroplan Dimasi Employment and Land Use
Review

Annexure D - Colliers International Large Format Retail Review &
Feasibility Analysis

Annexure E - Deep End Services Retail Analysis Response



ANNEXURE A

ATTACHMENT A

Response to Draft West Central District Plan – Keys Actions and Priorities

The Draft West Central District Plan 2016 (**District Plan**), prepared by the Greater Sydney Commissions (**GSC**), illustrates the subject site as a future location for “Major Projects & Precincts”, “Residential Focused Area” and “Potential Targeted Growth”. It is also adjacent to major “Public Open Space” and with close proximity to the “Economic Anchors” of Church Street, Parramatta. Overarching to the District Plan is the need for economic growth, job and housing creation and a better connected district.

The following provides a comparison of the Planning Proposal (**Proposal**) against the District Plan key actions and priorities.

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
Productivity Actions		
P1: Collaborate to create, own and deliver GOP	Increase total jobs and dwellings, and increase the proportion of health and education and knowledge and professional services jobs.	<p>The site is located within the Greater Parramatta and Olympic Park (GPOP), and will play a key support role to Parramatta as the second CBD.</p> <p>The sites scale, locality and physical attributes support major urban infill development, and it delivers on the District Plans “30 minute centres”, improving access to jobs, amenity and open space, whilst having minimal impact on existing low-density residential neighbourhoods.</p> <p>The mixed use Proposal is strategically justified, providing an integrated masterplan that is forecast to deliver up to 400 jobs (as well as indirect employment), new dwellings and numerous public benefits (later described) to support its development.</p> <p>The proposed rezoning will not impact employment land stocks and within its urban context, the site has a number of constraints which deem it unsustainable for continued industrial use or alternate feasible bulky good retail operations that are recommended under the Parramatta Road Transformation Strategy (PRUTS).</p> <p>Commercial Premises, as an additional permitted use in the R4 zone, will provide the ability and flexibility to activate the Crescent Street frontage with additional employment generating uses and add to the sites ability to provide professional and health related services on site.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
		<p>The Proposal gives provision of approximately 1,650 to 1,850 new dwellings within the Cumberland LGA, and the western Sydney region, which will ensure the staged delivery of housing supply for the Central West District.</p> <p>The Proposal also integrates transport and land use planning by creating connectivity between the site and the Parramatta CBD, Granville Precinct and Merrylands CBD. This is achieved through provision of landowner funded infrastructure including reservation of land for a future bus corridor, and pedestrian connectivity including improvements to existing pedestrian routes, and provision of a new pedestrian bridge across Woodville Road.</p>
P2: Develop and implement an economic development strategy for the Central City	Increase total jobs and proportion of health and education and knowledge and professional services jobs	<p>The site and its future potential employment outcomes will collectively contribute, with other sites in the area, to achieving the strategy's employment objectives.</p> <p>The Proposal will deliver retail, commercial and community employment uses through the creation of 13,000m² of employment floor space, creating new types of jobs ensuring the site retains and enhances its employment relevance.</p> <p>The District Plan establishes Church St, some 100m from the site, as a "Commercial Anchor" (District Plan pg. 32, Figure 3-1: GOP's major economic anchors) which will deliver on the work, live and play principles of the strategy when considering the Proposal.</p> <p>The proposed planning controls will create a place where people can access many services including entertainment, recreation and retail. In addition, the new commercial floor space presents an opportunity to increase the share of knowledge and professional services jobs to diversify employment opportunities.</p>
P3: Expand health and education activities in Westmead	Increase in total health and education and knowledge and professional services jobs.	<p>Not directly applicable to Proposal, however the proposed housing supply may indirectly contribute to the Westmead precinct through the provision of additional, and affordable housing typologies for future workers within the Westmead Health Precinct.</p> <p>As demonstrated in the Proposal, the proponent allowed for significant increase in 1 bed dwellings to reflect population demographics, and accounts for key worker requirements.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
P4: Develop a better understanding of the value and operation of employment and urban services land.		<p>The Proposal gives provision of the potential for urban services such as convenience retail, medical centres and child care, gym and other specialist commercial uses to be co-located on site with a supporting residential population. In addition, these urban services can also be utilised by surrounding residential development both existing and planned.</p> <p>The provision of such urban services on site reduces the need to travel to other areas, minimising congestion of the land transport system and encouraging walking and cycling activity. In addition, the provision of new infrastructure such as the new pedestrian bridge, ensures good connectivity of the site to other urban services within the Granville Precinct, and wider metropolitan Sydney.</p> <p>Through the provision of employment uses on site, the Proposal ensures that it prioritises protecting employment and urban services land areas in the West Central District, however promotes the provision of a broader range of employment land uses for the site than traditional businesses and urban services that may have once established on site.</p>
Liveability Actions		
L1: Prepare local housing strategies	Increase in diversity of housing choice	<p>Whilst it is noted the GSC will prepare local housing strategies, the Proposal will allow for the provision of approximately 1,650 to 1,850 new dwellings (dependent on apartment mix) within the Cumberland LGA, and the West Central district.</p> <p>An increase in a diverse residential supply will place downward pressure on the cost of living through providing more housing choice. We note that the Proposal assumes a mix of 5% 3 bedroom, 50% 2 bedroom, and 45% 1 bedroom. It should also be noted that this is a long term project that will likely be staged over many years, and consideration must be given to this against the relevant planning strategies as they evolve, and changes in market demand and dwelling type.</p>
L2: Identify the opportunities to create the capacity to deliver 20-year strategic housing supply targets	Creation of housing capacity	<p>The proposal is a long-term project that will likely be staged over many years, and will progressively contribute to the provision of supply as market demand allows for.</p> <p>The proposed rezoning of the site to B4 mixed use and R4 High Density Residential creates sufficient opportunity for housing supply targets to be met.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
L3: Councils to increase housing capacity across the District	Creation of housing capacity and increase in diversity of housing choice	<p>The site is specifically identified within the West Central District Plan as Potential for Targeted Growth in relation to housing.</p> <p>The Proposal's will contribute to both 5 year and 20-year housing targets. This is a significant contribution to meeting the West Central District's dwelling need of 49,400 dwellings in the next 5 years and its 20-year target of 202,500. In addition, the proposal contributes generously to the Cumberland Council's housing target of 9,350 in the next five years.</p> <p>As the Proposal is likely to be staged, the development can be aligned to emerging Council housing targets to ensure delivery of housing to meet demand and market take-up rates.</p> <p>The Proposal demonstrates the ability of the new housing proposed to be accessible to employment land uses, and the good transport connectivity the site achieves.</p> <p>Finally, the Proposal has the ability to accelerate housing supply to accommodate Sydney's new housing growth, whilst also responding to providing affordability to the market.</p>
L4: Encourage housing diversity	Increase in diversity of housing choice	<p>The District Plan identifies that existing stock in the West Central District is dominated by detached dwellings.</p> <p>We note that the Proposal assumes a mix of 5% 3 bedroom, 50% 2 bedroom, and 45% 1 bedroom. It is also noted that the proposed mix can be altered to meet market demand for different apartment housing typologies. Concepts like dual key dwellings, ground floor hybrid commercial use terraces and other emerging dwelling types will be considered with the evolution of the project.</p> <p>The Proposal seeks to provide a significant provision of high density residential within proximity to public transport and necessary services. Through this diversity, it is expected that some of the existing and future housing needs of the Cumberland LGA can be accommodated at the subject site.</p> <p>The provision of additional stock that is suited to the changing needs of the demographic is a key outcome of this Proposal, particularly in light of the unique site being a large urban renewal opportunity in a single ownership.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
L5: Independently assess need and viability	Increase in affordable rental housing	<p>In preparation of the Proposal there was no requirement for the provision of affordable housing from Cumberland Council, and furthermore there were no statutory requirements in place that required a developer to provide affordable housing.</p> <p>However, we note that affordable housing can be provided through the delivery of sustainable supply and allocation of dwellings for low income workers. Although this District Plan objective has emerged after the preparation of the Proposal, the Proponent understands the need to deliver such and can work through this element during the gateway rezoning phase.</p>
L6: Support councils to achieve additional affordable housing	Increase in affordable housing	
L7: Provide guidance on Affordable Rental Housing Targets	Increase in affordable rental housing	
L8: Undertake broad approaches to facilitate affordable housing	Increase in affordable housing	
L9: Coordinate infrastructure planning and delivery for growing communities	Change in industry perceptions	<p>Infrastructure aligned development to reduce traffic congestion, encourage public transport and walking/cycling have been a major consideration of the Proposal.</p> <p>The Proposal provides for significant new infrastructure to be brought on line that will be to the benefit of the whole Granville Precinct and the surrounding centres.</p> <p>The site is within 800 metres of public transport and in walking distance to bus stops along Parramatta Road and Woodville Road as well as multiple train stations including Harris Park and Granville. The site presents significant opportunity for connectivity to existing cycle paths and pedestrian networks that lead to these key transport nodes. The Proposal would therefore make better use of existing infrastructure and services which ensures that new housing has appropriate access to.</p> <p>The Proposal has the opportunity to be a catalytic project for Holroyd and the adjacent precincts through the improvement to pedestrian and cycle accessibility, including provision of new links and improvements of others to key transport infrastructure.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
		<p>The opportunities available to the site to connect with existing bicycle and pedestrian pathways within the immediate vicinity of the site will also reduce car patronage, and promote public transport use.</p> <p>The potential connections options available to the site with the adjoining Holroyd Sportsground to the north provide significant opportunity to connect future residents with existing regional cycle and pedestrian footpath.</p> <p>The proponent is proposing to provide a pedestrian bridge across Woodville Road to improve connectivity to Granville Station, which will provide a more pleasant environment as opposed to Parramatta Road.</p> <p>In addition, the Proposal gives provision for a bus lane and queue jump in Crescent Street to support a future bus route linking Merrylands to Granville and Parramatta, making the area bus capable. It is also proposed for bus stops to be located on both sides of Woodville Road adjacent to the new pedestrian bridge and the SP2 zone on site.</p> <p>The proposed new express bus along Woodville Road (which will benefit from the proposed footbridge successfully connecting the inbound and outbound bus stops) demonstrates in the PRUTS (Figure 18 , P61) that the site is located within an 800m catchment to public transport.</p> <p>Clearly the catalyst to the revitalisation of the corridor is the WestConnex Motorway. It should reduce traffic volumes on Parramatta Road and, in particular, provide an alternative route for trucks and heavy vehicles. This will free up road space for better public transport, while also encouraging walking and cycling.</p> <p>Consequently, whilst one looks at the current levels of congestion at the Parramatta Road / Woodville Road intersection, it is the aspiration of WestConnex to reduce traffic on Parramatta Road and hence relieve such congestion hotspots. Furthermore, the PRUTS at Page 58 indicates that the WestConnex scheme will include improvements at this intersection. This is described as follows: -</p> <ul style="list-style-type: none"> - <i>Parramatta Road/Woodville Road – Provision of additional westbound right turn bay to increase capacity and relieve Parramatta Road congestion. This treatment is already planned</i>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
		<p><i>as part of measures related to WestConnex and could assist in reducing queues and freeing up capacity to allow additional Precinct access and north-south movement</i></p> <p>Subject to approval of the Proposal, the proponents have confirmed their intention to enter into a Voluntary Planning Agreement for the investment into infrastructure to improve Councils open space, pedestrian and vehicular access, as well as urban amenity that will contribute to a better precinct and connectivity between the centres.</p> <p>Consequently, the existing road infrastructure, supplemented by the proposed improvements associated with WestConnex, will adequately accommodate the traffic from the subject development at the density proposed.</p> <p>Finally, it is noted that the Proposal has intentions of delivering key infrastructure at the proponents expense, which is in addition to and separate to what is proposed to be delivered by the PRUTS.</p>
L10: Provide data and projections on population and dwellings for local government areas across Greater Sydney	Contribute to more informed infrastructure investment decisions, strategic planning and plan making	Noted, this is a function of the GSC and not relevant to the Planning Proposal.
L11: Provide design led planning to support high quality urban design	Contribute to improved sustainability, productivity and liveability outcomes	<p>The site concept and planning aspirations have evolved as part of a comprehensive process following a master planning design competition with three leading Sydney design firms.</p> <p>Additional urban design expertise and independent review was undertaken with Mr Geoff Baker to ensure the concept plan for the Proposal delivered upon the key urban design principles for creating vibrant communities and places.</p> <p>It is also noted that the PRUTS also proposes design excellence requirements, and the proponent has demonstrated how they have and will continue to meet these requirements.</p>
L12: Develop guidelines for safe and healthy	Contribute to improved health outcomes and increased walking	Consistent with the District Plan and PRUTS “Urban Amenity Improvement Program” , the Proposal has demonstrated how it will open up new walking and cycle links, improve transport accessibility,

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
built environments	and cycling	<p>connect the centres, enhance the streetscape and character of the area and deliver major new public open space</p> <p>Creation of new open space, and enhancement of existing, is a deliverable in establishing healthy and vibrant communities. The Proposal delivers:</p> <ul style="list-style-type: none"> - 11,000m² (35% of the site) of site is allocated as publically accessible open space and includes a plaza element with proposed kids playground, water play area and large contiguous green space that will be landscaped to ensure an appropriate microclimate - 7,714m² of this area is set aside as parkland to be dedicated to Council - Under the VPA, the Proponent has also put forward to upgrade the adjacent underutilised Holroyd sportsground to create a potential 6-hectare parkland, including the potential for tennis and/or basketball courts which is an objective and deliverable of PRUTS “Urban Amenity Improvement Plan” <p>The potential connections options available to the site with the adjoining Holroyd Sportsground to the north provide significant opportunity to connect future residents with existing cycle and pedestrian infrastructure.</p> <p>The site is located within 800 metres to 1.2 kilometres (linear distance) of four existing heavy rail train stations which will encourage walking. Connectivity will be improved and walking times reduced through the provision of public domain upgrades, new laneways created by the development of the Granville Precinct and Church Street.</p> <p>Future residents can walk easily to public transport, local shops, schools, parks and open space areas, jobs and a range of community services and facilities that are all close by.</p> <p>The submission of the Proposal also included Air Quality and Noise and Vibration Assessments in relation to the masterplan concept, which concluded there were no health impacts posed by the development in its urban setting.</p>
L13: Conserve and enhance environmental	Identification and protection of heritage elements	Two heritage items, both of local significance, listed by Schedule 5 Part 1 of the Holroyd LEP 2013 are however within the vicinity of the site, being:

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
heritage including Aboriginal, European and natural		<ul style="list-style-type: none"> - Railway Memorial, Crescent Street Reserve, Granville. - Vauxhall Inn, No. 284-286 Parramatta Road, Granville. <p>A Heritage Impact Assessment undertaken by Weir Phillips provided with the Proposal concludes there will be no impact on the significance of this Memorial. Additionally, the proposed works will have no impact on the ability to understand the historic, aesthetic and social significance of this item and an acceptable impact on its setting and view corridors.</p>
L14: Develop a West Central District sport and recreation participation strategy and sport and recreation facility plan	Contribute to informed decision making for sport and recreation infrastructure and increased participation	<p>Noted, and in addition the proposal gives provision through an agreed VPA at the relevant stage of the Gateway Process for the provision of 7,714 m2 of public recreation land to be dedicated to Council.</p> <p>It is anticipated that future Section 94 contributions would also be utilised by Council for the provision of upgrades to the Holroyd Sportsground, or alternatively depending upon the outcome of the Proposal the proponent may undertake potential upgrade works to the Holroyd Sportsground, as potential off sets to any future Section 94 Contributions.</p> <p>The landscape concept submitted with the Proposal also identified precincts capable of being used for tennis, and playing fields.</p>
L15: Support planning for shared spaces	Increase in the provision of community facilities, including open space	<p>The proposal results in 35% of the site being publicly accessible and includes key features such as a public plaza, public open space and recreation areas, children's playgrounds and significant public domain improvements.</p> <p>The proposal gives provision through an agreed VPA at the relevant stage of the Gateway Process for the provision of 7,714 m2 of public recreation land to be dedicated to Council.</p> <p>The proposed Public Recreation land presents a significant opportunity for connectivity of the site, with the adjoining RE1 land within the Holroyd Sportsground.</p> <p>The provision of the RE1 Zone enables land to be used for public open space or recreational purposes, and can provide a range of recreational settings and activities that are both compatible with the proposed land uses for the site, and that enhance the mixed-use environment.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
		The proposed RE1 Zone also enable upgrades to the natural environment, including A'Becketts Creek, where opportunity exists to create a more natural interface with the Creek.
L16: Planning for school facilities	Improved education infrastructure decision making	<p>A significant increase in the residential population will increase patronage of existing public schools. As advised by representatives from the Department of Education and Communities, Granville Public School is presently below capacity and is actively seeking to meet as well as expand on their current capacity. As such, the development will assist in filling this void.</p> <p>In addition, given the significant growth proposed for Greater Parramatta, it is anticipated that government led provision of additional school facilities is likely to occur.</p> <p>The proponent, as part of its Proposal undertook a detailed social impact assessment that demonstrated the Proposal is welcomed by existing surrounding schools and educational institutions.</p>
L17: Support the provision of culturally appropriate services	Improved decision making on matters affecting the aboriginal community	Not applicable to the Proposal.
L18: Support planning for emergency Services	Contribute to improved decision making for emergency services operators	Noted, and the proponent will contribute as required.
L19: Support planning for cemeteries and Crematoria	Improved decision making for new cemeteries	Not applicable to the Proposal.
Sustainability Actions		
S1: Review criteria for monitoring water quality and waterway	Improved water quality and waterway health	The proposed creation of the RE1 public recreation space and the desire to de-urbanise A'Becketts Creek to a more natural form will ensure the long term protection of the environment

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
health		<p>A Water Sensitive Urban Design Strategy (WSUDS) for the masterplan was submitted with the Proposal and this requirement is acknowledged and supported.</p> <p>Further details of the Stormwater Management system, including Erosion and Sedimentation Control will be documented at the Development Application stage, including the stormwater provisions to suit staging of the development, in accordance with Council's requirements.</p> <p>The proponent as part of the Proposal has also demonstrated its intention to improve upon the existing concrete drainage culvert, through a redesign for a more natural finish, and therefore improving the interface between the site and the Holroyd Sportsground.</p>
S2: Protect the South Creek environment and use development approaches to achieve excellent environment performance	Improved water quality and waterway health, and integration of South Creek into land use planning	Not applicable to the Proposal.
S3: Develop a Strategic Conservation Plan for Western Sydney	Protection and management of areas of high environmental value	Not applicable to the Proposal.
S4: Update information on areas of high environmental value	Protection and management of areas of high environmental value	Noted, this is a role of the GSC.
S5: Use funding programs to deliver the West Central District Green Grid priorities	Delivery of the green grid priorities	Noted, this is a role of the GSC.
S6: Develop support tools and methodologies for local open space planning	Improved utilisation of open space and increased provision of open space	<p>Noted this is a function of the GSC, however we note the Proposal will deliver:</p> <ul style="list-style-type: none"> - 11,000m² (35% of the site) of site is allocated as publically accessible open space and includes a plaza element with proposed kids playground, water play area and large contiguous green space that will be landscaped to ensure an appropriate microclimate

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
		<ul style="list-style-type: none"> - 7,714m² of this area is set aside as parkland to be dedicated to Council, and the new park represents a 200% increase in new public open space for the Granville precinct under the PRUTS - Under the VPA, the Proponent has also put forward to upgrade the adjacent underutilised Holroyd sportsground to create a potential 6-hectare parkland, including the potential for tennis and/or basketball courts which is an objective and deliverable of PRUTS “Urban Amenity Improvement Plan”
S7: Create new recreational opportunities at Prospect Reservoir	Increased recreational opportunities at Prospect Reservoir	Not applicable to the Proposal.
S8: Update the Urban Green Cover in NSW Technical Guidelines to respond to solar access to roofs	Protection of solar access to roofs	Not applicable to the Proposal.
S9: Identify land for future waste reuse and Recycling	Identification of land for waste management	Not applicable to the Proposal.
S10: Embed the NSW Climate Change Policy Framework into local planning decisions	Contribute to energy efficiency, reduced emissions and improve environmental performance.	Noted, and the proponent will have regard to this as required.
S11: Support the development of initiatives for a sustainable low carbon future	Contribute to energy efficiency, reduced emissions and improve environmental performance	<p>Creating a more connected District and improving public transport access and efficiency, will reduce reliance on car use and therefore traffic congestion, encouraging alternate transport use including cycling and walking.</p> <p>Future design of apartments will ensure the implementation of green building initiatives and will facilitate good cross ventilation and solar access, which all contribute to reduce carbon emissions. These are matters to be progressed post rezoning in a development application phase.</p>

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
S12: Support the development of environmental performance targets and benchmarks	Contribute to improved environmental performance	Not applicable to the Proposal.
S13: Incorporate the mitigation of the urban heat island effect into planning for urban renewal projects and Priority Growth Areas	Contribute to reductions in ambient temperatures	Not applicable to the Proposal.
S14: Review the guidelines for air quality and noise measures for development near rail corridors and busy roads	Improved land use and transport decision making	<p>The proponent identified the importance of addressing this action, ahead of the District Plan release, and undertook both air and noise investigations.</p> <p>The Proposal was accompanied by an Air Quality Assessment that, on the basis of the dispersion modelling and analysis of the predicted air quality levels, concluded that the development would meet the air quality requirements contained in the Development near Rail Corridors and Busy Road-Interim Guideline (NSW Department of Planning, 2008), and could proceed at this location as is would be able to be developed without causing any adverse health impacts.</p> <p>The Proposal was also supported by a Noise and Vibration Assessment that did not identify any potential impacts on future occupiers of the site. The site is perceived to be adversely impacted by rail and road noise, however owing to the setback and the elevation of the adjacent train track (the majority of which are behind a wall and therefore shield sound and vibration), the true impacts are minimal on site.</p>
S15: Identify and map potential high impact areas for noise and air pollution	Improved land use and transport decision making	Noted, this is a role of the GSC.
S16: Address flood risk	Protection of life and property	Not applicable to the Proposal.

Key Action and Priority	Outcome	Planning Proposal Consistency or Contribution
issues in the Hawkesbury-Nepean Valley		

Parramatta Road Corridor Urban Transformation Strategy (Out of Sequence Checklist)

The site is located in “Corridor West” within the Granville “Frame Area” of the PRUTS. As outlined, the *“Frame Areas are important because they form the connections between Precincts, and in many cases, they will shape the transformation of the road corridor itself. The urban transformation of the Corridor should not be seen as the redevelopment of the Precincts alone, but rather the combined renewal of Precincts and Frame Areas, delivering a transformational effect on the Corridor as a whole”*.

The PRUTS “Implementation Plan 2016 – 2023” (**Implementation Plan**) forms part of the Implementation Tool Kit and is proposed to be supported by a Section 117 Ministerial Direction, which at the time of preparing this response has not been issued.

Planning proposals are anticipated to deviate from the staging and sequencing identified by the Implementation Plan, as an “Out of Sequence Checklist” has been created as part of the Implementation Plan. The Checklist ascribes a merit assessment process to determine whether proposals that are aligned with the Implementation Plan and whether they should be allowed to proceed.

The Out of Sequence Checklist ensures that changes to the land use zone or development controls do not occur without meeting the underlying Principles and Strategic Actions of the Strategy, such as the necessary transport, services and social infrastructure to service a new population.

Whilst all criteria in the Checklist are not entirely relevant to the Proposal, the following demonstrates strong justification as to why the Proposal undoubtedly demonstrates consistency with the underlying principles and strategic actions of the PRUTS.

Criteria	Proponents Compliance
Criteria 1 Strategic objectives, land use and development	
The planning proposal can demonstrate significant delivery or contribution towards the Strategy’s Corridor wide and Precinct specific vision.	<p>The sites scale, locality and physical attributes support major urban infill development and delivers on PRUTS objective for “15 minute neighbourhoods” and the District Plans “30 minute centres”, whilst having minimal impact on existing low-density residential neighbourhoods. The mixed use proposal is strategically justified, providing an integrated masterplan that supports the density proposed, and promotes the live work and play principles.</p> <p>Owing to its location, the site will support and connect the surrounding centres including the Parramatta CBD and Granville precinct, and has many attributes that make it both logical and supportable for the proposed rezoning.</p> <p>The Proposal will deliver a superior planning and urban design outcome via:</p> <ul style="list-style-type: none"> - Sustainable employment aligned to market needs - the retention/creation of up to 400 jobs through the delivery of 13,000m² of employment floor space comprising retail, commercial and community uses aligned to the growing population

Criteria	Proponents Compliance
	<ul style="list-style-type: none"> - Landowner funded infrastructure delivery to support the development and surrounding residents and communities - Housing diversity and affordability - the delivery of staged housing supply with diversity of dwelling type - Public open space - significantly improving amenity through the creation of new public open space - Improved connectivity - the provision of transport connectivity with the greater Granville precinct and corridor more generally (refer below) - A commitment to sustainability demonstrated by the Proposals initiatives <p>The proposal demonstrates consistency with the strategy through the following components:</p> <ul style="list-style-type: none"> - Infrastructure aligned planning of the site to reduce traffic congestion, encourage public transport and walking/cycling supports the densities proposed - Creation of new open space, and enhancement of existing, is a key objective and deliverable in establishing healthy and vibrant communities - It is not reliant on the Government in terms of funding and delivery for site servicing and infrastructure. The Proponent has put forward a comprehensive infrastructure proposal that includes delivery of a pedestrian bridge, dedicating land for a SP2 infrastructure zone for rapid bus, road widening and upgrades, new pedestrian and cycle connections and upgrades to others and delivery of major new public open space - It enables future occupiers to access a range of local services and facilities, within a reasonable amount of time (15min) from home - The Proposal offers safe and convenient access to a range of services and facilities, including shops, cafes and restaurants, early childhood centres, primary schools, parks and sporting fields, medical centres and public transport - The Proposal will create a neighbourhoods with a mix of services and facilities, which is well connected by walking and cycle paths and local public transport - The Proposal will facilitate more community-based places through the provision of a plaza and public recreation that are active and safe
<p>The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfills the relevant Strategic Actions for each Principle.</p>	<p>The proposal has strong consistency with the seven principles of PRUTS, as outlined below:</p> <p>Housing Choice and Affordability</p> <ul style="list-style-type: none"> - The Proposal gives provision of approximately 1,650 to 1,850 dwellings and allows for a mix of housing types including 1,2 and 3 bedroom apartments, dual key dwellings, and potential for ground floor hybrid

Criteria	Proponents Compliance
	<p>residential/commercial use terraces</p> <ul style="list-style-type: none"> - Historically the Granville and Holroyd areas have seen developments that included over 75% of two bedroom apartments. As outlined in the Proposal the Proponent has allowed for up to 45% 1 bedroom given the changing demographics, lack of affordability and proximity of the site to the Parramatta CBD - The Proposal is a long-term project that will likely be staged over many years, and housing stock and typologies can be altered depending upon market demand and demographic shifts at that point in time <p>Diverse and Resilient Economy</p> <ul style="list-style-type: none"> - The Proposal provides for up to 13,000m² of retail and commercial uses, that includes a diversified use aligned to the needs of the market, which has been supported by an Economic Impact Statement and Retail Hierarchy Study to ensure no impact to surrounding centres (refer Attachments C & E) - The Proposal gives a superior employment outcome that currently exists on site, and a superior outcome than would be achieved through the alternate zoning - Applying established and tested industry data, Macroplan and Deep End Services has conclusively shown that the Proposal will deliver an employment outcome of up to 400 full time jobs, being over 5% of the Granville precincts 7,200 jobs target forecast by 2050 - Land uses associated with B5 zonings (namely bulky goods) are more suited to larger employment clusters, where site accessibility and associated infrastructure is more capable of being developed and improved - The District Plan establishes Church St, some 100m from the site, as a “Commercial Anchor” (District Plan pg. 32, Figure 3-1: GPOP’s major economic anchors) which will deliver on the work, live and play principles of both strategies, given the supply of dwellings in such close proximity <p>Accessible and Connected</p> <ul style="list-style-type: none"> - As outlined in the “Precinct Transport Report” (page 61, Figure 18) the site is correctly defined within “800m walking catchment to public transport” - The site is located within 800 metres to 1.2 kilometres (linear distance) of four existing heavy rail train stations, with the closest being Harris Park and Granville stations - The Proposal has the opportunity to be a catalyst for Holroyd and the adjacent precincts through the improvement to pedestrian and cycle accessibility, including provision of new links and improvements of others to key transport infrastructure - Public transport is improved by the proposal via the pedestrian bridge which overcomes the barrier of Woodville Road and provides a more direct pedestrian connection between the site (and adjacent residential areas) to Granville Railway station, additional bus stops, SP2 infrastructure zone that will allow buses to

Criteria	Proponents Compliance
	<p>efficiently travel from Merrylands and “jump” the traffic at one of the most critical intersections</p> <ul style="list-style-type: none"> - The opportunities available to the site to connect with existing regional bicycle and pedestrian pathways within the immediate vicinity of the site will also reduce car patronage, and promote public transport use - The potential connections options available to the site with the adjoining Holroyd Sportsground to the north provide significant opportunity to connect future residents with existing cycle and pedestrian infrastructure - Future residents can walk easily to public transport, local shops, schools, parks and open space areas, jobs and a range of community services and facilities that are all close by, consistent with the principles of “15 minute neighbourhoods” <p>Vibrant Community Places</p> <ul style="list-style-type: none"> - Creation of new open space, and enhancement of existing, is a key objective and deliverable of the strategy in establishing healthy and vibrant communities - The proposal results in 35% (11,000m²) of the site being publicly accessible and includes key features such as a public plaza, public open space and recreation areas, children’s playgrounds and significant public domain improvements - The proposal will facilitate more community-based places through the provision of a plaza and public recreation that are active and safe - The proposed local retail will create a self-sufficient retail community, capable of serving residents on site, and surrounding residents in the wider precinct <p>Green Spaces and Links</p> <ul style="list-style-type: none"> - The proposal gives provision through a VPA for the provision of 7,714 m2 of RE1 public recreation land to be dedicated to Council - It is anticipated that future Section 94 contributions would also be utilised by Council for the provision of upgrades to the Holroyd Sportsground, or alternatively depending upon the outcome of the Proposal the proponent may undertake potential upgrade works to the Holroyd Sportsground, as potential off sets to any future Section 94 Contributions - The proposed Public Recreation land presents a significant opportunity for connectivity of the site, with the adjoining RE1 land within the Holroyd Sportsground - The provision of the RE1 Zone enables land to be used for public open space or recreational purposes, and can provide a range of activities that are both compatible with the proposed land uses for the site, and that enhance the mixed use environment

Criteria	Proponents Compliance
	<p>Sustainability and Resilience</p> <ul style="list-style-type: none"> - The provision of jobs servicing the Granville Precinct will collectively contribute to sustainable outcomes through the ability of people to live and work without the need to travel long distances - Infrastructure aligned development to reduce traffic congestion, encourage public transport and walking/cycling are key attributes of the Proposal - These factors will all also contribute to a low carbon future, reducing the dependency on car travel. Future design of apartments is capable of achieving good cross ventilation and solar access, which all contribute to reduced carbon emissions <p>Delivery</p> <ul style="list-style-type: none"> - The Proposal is not reliant on the Government in terms of funding and delivery for site servicing and infrastructure - The Proponent has confirmed their intention to enter into a Voluntary Planning Agreement (VPA) for the investment into infrastructure to improve Council's open space, improve pedestrian and vehicular access, as well as urban amenity that will contribute to a better corridor and connectivity between centres - The provision of infrastructure associated with the Proposal is at the expense of the Proponent, and is additional infrastructure not identified to be delivered by the NSW Government as part of the Strategy
<p>The planning proposal can demonstrate significant net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located.</p>	<p>The Proposal has demonstrated the following benefits to the community:</p> <ul style="list-style-type: none"> - 7,714m² of this area is set aside as parkland to be dedicated to Council, and is illustrated in the PRUTS as "Indicative Proposed Open Space" - this new park represents a 200% increase in new public open space for the Granville precinct - Major new public open space and amenity with the ability to connect with the Holroyd Sportsground to create a potential 6 hectare parkland - A superior employment outcome that will provide new types of jobs, ensuring the site retains and enhances its employment relevance - New local shops and facilities proposed to include a supermarket, specialty retail, gym, childcare, medical, showroom, cafes, restaurants servicing the onsite residents and surrounding communities - A pedestrian bridge across Woodville Road to improve connectivity and safe access to Granville station, whilst also providing a link for Granville residents to access the site and Merrylands - An on-site transport corridor (SP2 zone) provision to support future bus routes between Merrylands, Parramatta and Granville, including road widening and upgrades

Criteria	Proponents Compliance
	<ul style="list-style-type: none"> - Proposed new bus stops adjacent to pedestrian bridge and in the SP2 zone - Improved pedestrian and cycle accessibility including provision of new links and improvements of others, with the creation and upgrade of major open space - Visual improvement to a prominent site at the Gateway to Holroyd and the western end of the Parramatta Road Corridor
<p>The planning proposal is consistent with the recommended land uses, heights, densities, open space, active transport and built form plans for the relevant Precinct or Frame Area.</p>	<p>We note that the Proposal is not directly consistent with recommended planning controls of the PRUTS, however the UrbanGrowth recommendations do not reflect the key principles of the PRUTS, insofar as they relate to the site specific strategic merits and public benefits the Proposal.</p> <p>The summary document provides a comparison of the Proposal against the key principles of what UrbanGrowth has put forward. It is clearly evident the Proposal achieves the key principles and can demonstrate why the Proposals planning controls are more suitable and will deliver a better outcome for everyone involved.</p> <p>Landuse</p> <ul style="list-style-type: none"> - As concluded by Macroplan Demasi and Colliers International in Attachment C & D accompanying this document, the site constraints deem it unsustainable for the PRUTS recommended B5 zone and the continued industrial and/or bulky goods retailing uses are neither suitable or feasible - The B5 Business Development zone proposed by the PRUTS, in particular, will restrict the use to industrial, warehousing and bulky goods. This will create land use conflict and amenity impacts with the proposed adjacent residential uses, severely compromise accessibility and provision of public open space and generate traffic in excess of 50% greater than the Proposal - Macroplan's findings are generally consistent with those PRUTS "Economic Analysis Report" which acknowledges the importance for bulky goods businesses to co-locate and cluster to increase efficiency, productivity and build economic resilience. In our view, the isolated nature of the subject site presents as a substantial barrier to its suitability for bulky goods retailing - It is also noted that the PRUTS deems the adjoining land to west, that is currently zoned B5, to transition to a medium density residential zoning, however no specific justification has been provided to support the split zoning on the site proposed by PRUTS - We have also considered the suitability of the B6 zoning, suggested by PRUTS to be applied to that part of the site which is not serviced by the Woodville Road corridor. We believe this zoning is misplaced and that Crescent Street can hardly be defined as an 'enterprise corridor', such that its appeal to a range of 'corridor-based' uses is doubtful. That said the intent of the B6 is in accordance with the Proposal in that it provides

Criteria	Proponents Compliance
	<p>residential and mixed use development</p> <ul style="list-style-type: none"> - PRUTS generally accepts that the current zoning structure is not suited to logistics uses and unlikely to encourage new employment outcomes and innovative market responses to new demand. We agree with this sentiment but differ in the choice of zones considered appropriate to make an employment difference at the subject site - We believe the Proposals B4 and R4 zones provide an outcome consistent with strategic intent and objectives of the PRUTS <p>Heights and Density</p> <p>Although the site puts forward a higher density, ultimately derived by the heights of the tower elements in the masterplan, the ability of the site given its locality and physical attributes to deliver major urban infill development, whilst having minimal impact on existing low-density residential neighborhoods cannot and should not be overlooked.</p> <p>The Proposal puts forward an 8 storey ground plane with well separated tower elements generally between 14 – 25 storeys, with one marker tower of 35 storeys. The heights differ from the PRUTS recommendations for the site, however are consistent with the design guidelines of the Granville Precinct.</p> <p>The Proposals philosophy on building heights was to allow the provision of significant new open space on site, and to provide good outlook and north facing solar access to a significant amount of the dwellings.</p> <p>Page 87 of the PRUTS states to “Recognise the Historical Junction’ and acknowledge/reinforce that it is a junction, both of rail lines and of suburbs/centres, being the southern extent of Parramatta, western extent of Granville, northern/eastern extent of Holroyd/Merrylands “ as a key action. The proponent put forward a marker tower of 35 storeys on the Woodville / Parramatta Rd frontage to signify the regional importance of this junction to Holroyd and Parramatta. The Fine Grain Study also illustrates the site as highest topographical point in the Parramatta Road corridor and it makes logical sense to have a market tower to signify this important junction</p> <p>The Proposals density reflects the sites role as a supporting centre in its sub regional context. By way of density comparison:</p> <ul style="list-style-type: none"> - Church Street – 10:1 FSR - Merrylands CBD – 9:1 FSR - PRUTS Granville Precinct – 6:1 FSR

Criteria	Proponents Compliance
	<ul style="list-style-type: none"> - Proposal's FSR is 4:1 FSR (including the RE1 and SP2 zones) <p>Through the division of the site into the proposed land uses, the PRUTS is recommending to disjoint and create conflicting land use on one of the largest single landholdings. This is contrary to the "Planning & Design Guidelines" (Section 5.8-Lot Amalgamation), which outlines that "Amalgamation of lots is required to achieve increased height and floor space ratios permitted on larger sites"</p> <p>This point, coupled with the Proponent funded infrastructure and public benefits, support the proposed densities, particularly when considered in the context of the PRUTS seven key principles.</p> <p>Open Space</p> <p>The Proposal is consistent in this regard, providing 7,714m² of new RE1 public recreation space that is proposed to be dedicated to Council. This delivers a park representing a 200% increase in new public open space for the Granville precinct.</p> <p>Under the VPA, the Proponent has also put forward to upgrade the adjacent underutilised Holroyd sportsground to create a potential 6-hectare parkland, including the potential for tennis and/or basketball courts which is an objective and deliverable of PRUTS "Urban Amenity Improvement Plan"</p> <p>Transport</p> <p>Infrastructure aligned development to reduce traffic congestion, encourage public transport and walking/cycling have been a major consideration of the Proposal.</p> <p>The Proposal provides for significant new infrastructure to be brought on line early that will be to the benefit of the whole Granville Precinct and the surrounding centres.</p> <p>Consistent with PRUTS "Urban Amenity Improvement Program" it will open up new walking and cycle links, improve transport accessibility, connect the centres, enhance the streetscape and character of the area and deliver major new public open space.</p> <p>The Proponent has put forward to deliver and fund:</p> <ul style="list-style-type: none"> - A pedestrian bridge across Woodville Road to improve connectivity and safe access to Granville station, whilst also providing a link for Granville residents to access the site and Merrylands - An on-site transport corridor (SP2 zone) provision to support future bus routes between Merrylands,

Criteria	Proponents Compliance
	<p>Parramatta and Granville, including road widening and upgrades</p> <ul style="list-style-type: none"> - Proposed new bus stops adjacent to pedestrian bridge and in the SP2 zone - Improved pedestrian and cycle accessibility including provision of new links and improvements of others, with the creation and upgrade of major open space (refer below) <p>Built Form</p> <p>We refer to the comments under the Height & Density.</p> <p>Professional extensive analysis and advice from industry leading consultants has informed the master plan and proposed planning controls, through a collaborative and holistic approach which rigorously considered each critical planning element.</p> <p>The Proposal has demonstrated compliance with the requirements of SEPP 65, and has demonstrated how it will deliver excellent level of amenity can be achieved on and surrounding the site. Future built form outcomes for the site will also be subject of scrutiny from development application assessment, which will ensure a positive design outcome is achieved.</p>
<p>The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy.</p>	<p>The Granville Precinct is seeking 4,500 homes and 7,200 new jobs by 2050</p> <p>The Proposal is providing up to 400 jobs (5.5% of this total) and has the ability to deliver 1,650-1,850 apartments dependent on dwelling type and market demand for housing.</p> <p>As previously outlined, the Proposal will deliver a superior employment outcome better aligned to the changing needs of the market. (refer Attachments C, D & E)</p> <p>Additionally, the Proposal gives provision of a good capacity for housing, which can importable be staged given the sites attributes. Although anticipated to be brought on ahead of the PRUTS Implementation Plan, the site can deliver on housing targets over an extended period with certainty of delivery. In contrast, other sites within the Granville priority precincts may require amalgamation and there is uncertainty over the funding capacity and certainty for some of these landowners to deliver, which may impede supply as it's anticipated by the PRUTS.</p> <p>It is considered that the Proposal can demonstrate, through the implementation of its self-funded infrastructure aligned development, why it can be delivered in advance of the PRUTS Implementation timeframes.</p>

Criteria	Proponents Compliance
	<ul style="list-style-type: none"> - Whilst the Implementation Plan 2016 – 2023 has been informed by the level of support and funding from government, the Proposal will deliver its own infrastructure that is aligned to the principles of the : - improved access and connectivity; - provision for future public transport upgrades; - provision of new open space and dedication of 7,714m² of public open space to Council; and - upgrades to the public domain and the Holroyd Sportsground. <p>As the proposal is a long term implementation, the ability to align housing types to suit the market conditions is a key factor which enables the proposal to be future proofed to ensure, as market conditions and population demands evolve or change, the site can respond to such demands and needs, particularly in relation to provision and typology.</p>
<p>The planning proposal demonstrates design excellence can be achieved, consistent with councils adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines (Planning and Design Guidelines).</p>	<p>The Proponent originally undertook a preliminary site master planning design competition with leading Sydney Design firms, with Architectus selected. Since the competition the master plan has evolved to consider a range of stakeholder feedback including from Cumberland Council. In addition to the urban design expertise provided by Architectus, and third party expert urban design advice received from Mr Geoff Baker has ensured that the concept plan for the Proposal results in a positive built form outcome.</p> <p>The Concept Design Plan has evolved as part of a comprehensive master planning process for the site, which the proponent undertook a preliminary site master planning design competition with three leading Sydney Design firms.</p> <p>Since the competition the master plan has evolved to consider a range of stakeholder feedback including from Cumberland Council. In addition to the urban design expertise provided by Architectus, third party expert urban design advice received from Mr Geoff Baker to ensure the concept plan for the Planning Proposal maintains the following in relation to Urban Design.</p> <ul style="list-style-type: none"> - The zoning overlays and density proposed (Site FSR of 4:1) reflects the large site area, access to existing transport, proposed transport improvements, the 450 metres of road frontage, provision of major new open space, and future connectivity and a retail/commercial element that is sustainable and self-sufficient reducing car trips. - The surrounding centres have mixed use densities from 6:1 (Merrylands CBD and Granville Precinct under the PRUTS) increasing to 10:1 in Church Street and Parramatta by comparison. The proposed 4:1 within a supporting local centre is considered appropriate for the precinct and an appropriate transition.

Criteria	Proponents Compliance
	<ul style="list-style-type: none"> - The proposal gives provision of a tower arrangement to reduce overshadowing impacts to the south and ensure only one marker tower over 25 storeys is provided. - Additional ground floor commercial uses have been provided to the western portion of the site within the 1st storey addition fronting Crescent Street, which provides additional employment potential for the site. - The potential for a transport corridor along Crescent Street, has also been provided within the modified Concept Plan through the dedication of a 3m strip of land, along with a potential new pedestrian bridge across Woodville Road to improve connectivity to Granville Station. <p>The proposal submitted with the Planning Proposal ensures a positive design outcome for the site, and is capable of future modification as design development progresses. The current concept plan does however in the meantime achieve the following:</p> <ul style="list-style-type: none"> - Ensuring the proposed development is appropriate and provides transitions to adjoining heritage items, public domain and areas of differing uses or scales identified in the Strategy; - Encourages a diverse range of solutions that can be developed to suit the site location; - skills and provide better advice to applicants as the lodgement process takes place; - Fosters innovation to ensure that built form contributes to improved living; - Encouraging developers to deliver permanent tangible outcomes for the greater public good within their development. <p>The proposal has demonstrated good level of compliance with the requirements of SEPP 65 and in some instances, exceeds requirements, and has demonstrated that a good level of amenity can be achieved on and surrounding the site should the Concept Plan proceed.</p> <p>Should the proposal proceed to Gateway the proponent is open to the site being considered for a formal design excellence process to achieve an optimum design outcome for the site.</p>
Criteria 2 Integrated Infrastructure Delivery Plan	
An Integrated Infrastructure Delivery Plan, which identifies advanced infrastructure provision and cost recovery for the local and regional infrastructure identified in the	<p>Infrastructure aligned development to reduce traffic congestion, encourage public transport and walking/cycling have been a major consideration of the Proposal in ensuring its reality of delivery.</p> <p>The Proposal provides for significant new infrastructure to be brought on line early that will be to the benefit of the</p>

Criteria	Proponents Compliance
<p>Infrastructure Schedule, must support the planning proposal. The Integrated Infrastructure Delivery Plan must demonstrate a cost offset to council and agency costs for a set period that aligns with the anticipated timing for land development identified in the Implementation Plan 2016 – 2023.</p> <p>Infrastructure to be considered includes:</p> <ul style="list-style-type: none"> - public transport - active transport - road upgrades and intersection improvements - open space and public domain improvements - community infrastructure, utilities and services. 	<p>whole Granville Precinct and the surrounding centres.</p> <p>The Proposal will, at the proponents cost, provide a number of key infrastructure items. These include:</p> <ul style="list-style-type: none"> - Dedication of land along Crescent Street to facilitate Transport for New South Wales' desire to provide a bus service between Merrylands and Granville. This land will enable the provision of a bus lane which will allow buses to queue jump on the approach to the traffic signals; - Widening of Crescent Street to provide a right turn facility into the site; - Provision of a pedestrian overbridge that will overcome the barrier created by Woodville Road allowing pedestrians to cross easily from one site to the other - Provide a more direct pedestrian connection between the site (and adjacent residential areas) to Granville Railway station - Facilitate the new express bus on Woodville Road by allowing southbound buses which would be likely to stop close to the bridge, to set down passengers who can then cross to the west side of Woodville Road. This cannot easily be achieved at present. - Provide connections to the existing cycleway and, by means of the proposed open space, provide a more pleasant environment for cycling which is adjacent to residential / commercial activity as opposed to at present where it is passing through largely derelict land; - Give provision of new open space and dedication of 7,714m2 of public open space to Council, and potential new upgrades to the public domain and the Holroyd Sportsground - Give provision for commercial floor space to accommodate future childcare, and medical centre facilities; <p>The Proponent acknowledges and will also commit to contribute to the Woodville Road/Parramatta Road intersection. It is presumed that Government will be assembling a funding mechanism so that not only the subject site, but other developments that create traffic impacts at this intersection, will be required to contribute.</p>
Criteria 3 Stakeholder Engagement	
<p>Consultation and engagement with relevant stakeholders (council, government agencies, business, community, adjoining properties and user or interest groups, where relevant) have been undertaken, including any</p>	<p>The Proposal has already undertaken extensive consultation with neighbouring landowners and occupiers, community stakeholder groups and all relevant Government authorities and utility providers. The key stakeholders that have been notified about the proposed rezoning have included:</p>

Criteria	Proponents Compliance
relevant pre-planning proposal engagement processes required by local council.	<ul style="list-style-type: none"> - Holroyd City Council; - Local Elected Members; - Neighbouring occupiers and land owners through letter box drops, advertising in the Parramatta Holroyd Sun Newspaper and community drop in sessions; - Parramatta Council; - NSW Urban Growth; - NSW Department of Planning and Environment; - NSW Roads and Maritime Services (RMS); and - Transport for NSW; <p>A report was included with the Proposal submitted on June 17 2015 and is contained with Appendix 15 of that Proposal.</p> <p>In addition, the proponent has provided the JRPP and DPE with a comprehensive chronology of correspondence and meeting minutes with various stakeholders which demonstrate extensive consultation in relation to the proposal.</p> <p>Lastly, the Proponent undertook three self-initiated community consultation sessions, held at the Holroyd Centre, in which minimal attendance and feedback was received. This has been documented accordingly in the information provide to the DPE.</p>
An appropriate level of support or agreement is documented	<p>The level of support for the proposal is well documented in the Proposal issued to the DPE on 17 May 2016. Should this need to be resubmitted we would be pleased to provide it.</p> <p>In addition, most recently, Transport for NSW has provided support for the provision of a bus corridor along Crescent Street as part of the proposal, and a new pedestrian bridge to Woodville Road and future bus stops.</p>
Provision of documentary evidence outlining the level of planning or project readiness in terms of the extent of planning or business case development for key infrastructure projects.	<p>The proposal is only at pre Gateway stage in the overall Gateway process, and therefore the development of planning and business will evolve significantly at the Gateway stage of the proposal. The Proposal has demonstrated significant strategic merit to proceed to the Gateway stage of the process.</p> <p>Despite this the proponent has already commenced discussions with NSW RMS and Transport for NSW in relation to potential future transport infrastructure upgrades.</p>

Criteria	Proponents Compliance
Criteria 4 Sustainability	
<p>The planning proposal achieves or exceeds the sustainability targets identified in the Strategy.</p>	<p>The Proposal is considered to contribute to the Sustainability targets of the Strategy through the following:</p> <ul style="list-style-type: none"> - The future design of development will meet the best practice BASIX energy and water targets, incorporating significant renewable energy and water reuse requirements. In addition the Proposal as submitted has provided a Water Sensitive Urban Design Concept to support the proposed concept plan. - Future building designs will seek to achieve 5-star Nabers commercial and retail buildings. - The need for people to walk easily to public transport has been clearly identified. Clearly the submissions provided to date have confirmed that the proposed development and its pedestrian bridge over Woodville Road will provide access to Granville Railway Station, and the dedication of a public transport corridor along Crescent Street will all contribute to the ability of new, and existing residents, to reach good quality public transport facilities. - The proposed new express bus along Woodville Road (which will benefit from the proposed footbridge successfully connecting the inbound and outbound bus stops) has resulted in the site being identified in the Parramatta Road Urban Transformation Precinct Transport Report (Nov 2016) as being in a location within an 800m catchment of public transport. - These factors will all contribute to a low carbon future, reducing the dependency on car travel. Future design of apartments is capable of achieving good cross ventilation and solar access, which all contribute to reduced carbon emissions. - The proposal gives provision of increased open space (7,714 m2 of public recreation land to be dedicated to Council) including green infrastructure. The proposal also seeks to improve existing open space and proposes new tree plantings across the site and the Holroyd Sportsground to improve the public domain and ensure sufficient levels of shading is provided. - Future design development will explore provision of design initiatives to deliver reductions in energy. - The proposal has demonstrated an ability to achieve good air quality outcomes, and the proposed land uses are not likely to result in reductions to air quality - The proponent has already demonstrated a commitment to design excellence to include integration of sustainability measures as part of any concept development.

Criteria	Proponents Compliance
Criteria 5 Feasibility	
<p>The planning proposal presents a land use and development scenario that demonstrates economic feasibility with regard to the likely costs of infrastructure and the proposed funding arrangements available for the Precinct or Frame Area.</p>	<p>The project can be delivered based on the Proposal put forward. We also note that:</p> <ul style="list-style-type: none"> - The Sydney market has demonstrated a need for the urgent delivery of affordable housing, with current market metrics, pricing many buyer groups out of the market - The retail elements of the employment generating floor space have been conclusively shown to be supported by market based data, and with future population increases on site and the surrounds this will be further reinforced (Refer Attachment E) - The commercial and service employment space will serve an important role to support the changing nature of the Parramatta Road corridor and the Frame Area for which the site sits - Preliminary feasibility analysis supports the successful delivery of the project, including the infrastructure provisions put forward
Criteria 6 Market Viability	
<p>The planning proposal demonstrates a land use and development scenario that aligns with and responds to market conditions for the delivery of housing and employment for 2016 to 2023. Viability should not be used as a justification for poor planning or built form outcomes.</p>	<p>We refer the reader to Attachments B to E (following this report) in response to this aspect of the Proposal. The B5 Business Development zone recommended by the PRUTS, in particular, will restrict the use to industrial, warehousing and bulky goods. This will create land use conflict and amenity impacts with the proposed adjacent residential uses, severely compromise accessibility and provision of public open space, generate traffic well in excess of the Proposal and based on the expert advice from Macroplan Demasi and Colliers International is not viable or feasible and will result in the sterilisation of the site.</p> <p>It is submitted that the planning controls will deliver a more appropriate urban design and development outcome for the site, aligned with the vision for the PRUTS.</p>

Parramatta Road Corridor Urban Transformation Strategy (Granville Precinct Action Plan 2016 – 2023)

This section and its responses should be considered also having regard to the detail provided in the PRUTS “Out Of Sequence Checklist” described above .

Strategic Actions and Priorities	Planning Proposal Provision or Contribution
Strategic Land Uses	
A maximum of 350,000m ² residential gross floor area.	<p>The proposal can accommodate between 1,650 – 1,850 dwellings on site, with the ability to be staged over an extended period as market demand permits.</p> <p>Such provision will considerably contribute to the housing targets and typologies sought by the West Central District Plan and the Parramatta Road Urban Transformation Strategy.</p> <p>The District Plan, prepared by the Greater Sydney Commissions, illustrates the site as a future location for “Major Projects & Precincts”, “Residential Focused Area” and “Potential Targeted Growth, which needs to be considered on the context of the PRUTS.</p>
<p>Consistent with the requirements of the Strategy:</p> <ul style="list-style-type: none"> - a minimum of 5% of new housing is to be provided as Affordable Housing, or in line with Government policy of the day. - a range of housing diversity typologies as identified within the Strategy are to be provided. - 	<p>It is noted that prior to the release of the PRUTS and District Plan, there has been no suggestion of the provision of affordable housing from Cumberland Council, nor a statutory requirement in place to require a developer to provide affordable housing.</p> <p>Affordable housing can be both provided through the delivery of sustainable supply and allocation of dwellings for low income workers. Although the PRUTS objective has emerged after the preparation of the Proposal, the Proponent understands the need to deliver such and can work through this element during the gateway rezoning</p>
A minimum 160,000m ² employment gross floor area of predominantly light industrial, enterprise, commercial, retail and community uses.	<p>The proposal seeks to give provision of 13,000m² of commercial/retail floor space and contributes significantly to the provision of employment gross floor area.</p> <p>Applying established and tested industry data, Macroplan and Deep End have conclusively shown that the Proposal will deliver an employment outcome of up to 400 full time jobs, being over 5% of the Granville precincts 7,200 jobs target forecast by 2050.</p>

Strategic Actions and Priorities	Planning Proposal Provision or Contribution
	<p>Under the PRUTS recommendations, the highest and best use could deliver 45,000m² of bulky goods and mixed use floor space, which results in a heavy concentration of employment on site that is clearly not the intention of the PRUTS and its Economic Analysis report.</p> <p>Based on the Proponents detailed evidence supported merit assessment, the allocated land use zoning by the PRUTS will inhibit and fail to deliver development outcomes consistent with its strategic objectives and those in the draft District Plan.</p> <p>The B5 Business Development zone in particular will restrict the use to industrial, warehousing and bulky goods. This will create land use conflict and amenity impacts with the proposed adjacent residential uses, severely compromise accessibility and provision of public open space, generate traffic well in excess of the Proposal and based on the expert advice from Macroplan Demasi and Colliers International is not viable or feasible and will result in the sterilisation of the site.</p>
Public Transport	
<p>TfNSW to continue to implement the strategic initiatives of the Sydney CBD to Parramatta Strategic Transport Plan, including the following key public transport projects for Corridor West:</p> <ul style="list-style-type: none"> - upgrade of Western Sydney Rail services, including the Western Line and Northern Line to allow for faster and more frequent services. 	<p>The proponent has engaged with TfNSW and has received in principle support for the proposed Woodville Road pedestrian bridge, new bus stops and SP2 infrastructure corridor.</p> <p>The proposal has good connectivity to rail services and proposes infrastructure upgrades to improve connectivity to rail services, particularly with the infrastructure upgrades put forward by the Proponent.</p>
Active Transport	
<p>Development in the Precinct to make an appropriate contribution to the delivery of new cycleways as indicated in the Planning and Design Guidelines, including:</p> <ul style="list-style-type: none"> - Bold Street - Cowper Street 	<p>The opportunities available to connect with existing regional bicycle and pedestrian pathways within the immediate vicinity of the site will also reduce car patronage, and promote public transport use.</p> <p>The potential connections options available to the site with the adjoining Holroyd Sportsground to the north provide significant opportunity to connect future residents with existing cycle and pedestrian infrastructure.</p>

Strategic Actions and Priorities	Planning Proposal Provision or Contribution
<ul style="list-style-type: none">- Alfred Street (north and south of Parramatta Road)- Victoria Street- Gray Street.	Future residents can walk and cycle easily to public transport, local shops, schools, parks and open space areas, jobs and a range of community services and facilities that are all close by.
Development in the Precinct to be designed to deliver through-site links as indicated in the Planning and Design Guidelines, including: <ul style="list-style-type: none">- Rosehill Street – M4 Motorway- Prince Street – Victoria Street – Parramatta Road- Parramatta Road – Cowper Street – East Street.	Noted, and the Proposal provides new an important through links to compliment the intent of the PRUTS as described in this document and prior submissions.
Open Space and Recreation	
Delivery of the urban plaza.	Noted, however the Proposal will also deliver its own onsite urban plaza and interactive space that will interface between ground floor commercial uses (including restaurants and cafes) and the public recreation spaces.
Delivery of the new local open space on the corner of Albert Street and Prince Street.	The Proposal gives provision through an agreed VPA for the provision of 7,714 m2 of public recreation land to be dedicated to Council. This represents a 200% increase in new public open space for the Granville precinct.
In accordance with the Infrastructure Schedule, provision of contributions towards the short term open space facilities.	
Community Facilities	
Development in the Precinct to make an appropriate contribution to facilities that include: <ul style="list-style-type: none">- upgrade of Merrylands Community Centre to provide additional meeting space	Development contributions collected by Council as part of any future development applications are anticipated to be contributing to the provision of such infrastructure.

Strategic Actions and Priorities	Planning Proposal Provision or Contribution
<ul style="list-style-type: none"> - upgrade of cultural facilities within the Granville Multicultural Community Centre - public art installation within Granville Town Centre - upgrade of Parramatta Central Library facilities. 	
Provision of an additional: <ul style="list-style-type: none"> - 266 childcare places - 31 Before School Care places - 106 After School Care places - 76 Vacation Care places 	The Planning Proposal gives provision for a 100 place childcare facility as part of the masterplan concept.
Education Facilities	
In accordance with the Infrastructure Schedule, provision of appropriate contributions towards primary and secondary schools.	Development contributions collected by Council or the NSW Government as part of any future development applications are anticipated to be contributing to the provision of such infrastructure.
Health Facilities	
Development in the Precinct to make an appropriate contribution to the upgrade and reconfiguration of Merrylands Community Health Centre.	Development contributions collected by Council or the NSW Government as part of any future development applications are anticipated to be contributing to the provision of such infrastructure.
Road Improvements and Upgrades	
Prior to any rezoning commencing, a Precinct-wide traffic study and supporting modelling is required to be completed which considers the recommended land uses and densities, as well as future Westconnex	<p>This is acknowledged by the Proponent, however it is noted the Proponent has undertaken its own detailed traffic impact assessment which was submitted with the Proposal.</p> <p>The transport initiatives put forward with the Proposal will require the detailed and further ongoing engagement with Council, RMS and Transport for NSW during the relevant rezoning phase.</p>

Strategic Actions and Priorities	Planning Proposal Provision or Contribution
conditions, and identifies the necessary road improvements and upgrades required to be delivered as part of any proposed renewal in the Precinct.	
Funding Framework or Satisfactory Arrangements	
New and upgraded roads, community facilities and open space to be delivered by development and funded through Section 94 contributions, the SIC levy and/or works in kind. The value of the contribution shall be consistent with the Infrastructure Schedule.	<p>Subject to the agreement of an outcome of the Proposal, the Proponent has put forward the following public benefits and works in kind as part of a potential future VPA:</p> <p>Public Open Space (RE1 Public Recreation Zone)</p> <ul style="list-style-type: none"> - Design, construct and dedicate to Council a public open space of approximately 7,700m². <p>Public Transport Provision – Bus Lane (SP2 Infrastructure Zone)</p> <ul style="list-style-type: none"> - Dedicate approximately 3 metres of land across the Crescent Street frontage of the site to the junction of Woodville Road for future public transport (bus hop lane). <p>Woodville Road Pedestrian Bridge – Connectivity Link to Granville Station</p> <ul style="list-style-type: none"> - Design and construct a pedestrian bridge from Woodville Road into Railway Parade, Granville <p>A’Becketts Creek</p> <ul style="list-style-type: none"> - Rehabilitate and beautify the section A’Becketts Creek that runs along the northern boundary of the site of the Proposed Development to Council’s reasonable specifications. <p>Crescent Street & Woodville Road Upgrades</p> <ul style="list-style-type: none"> - Upgrade the external roadway and traffic signalling on Crescent Street in accordance with the Traffic’s engineers design for the Proposal. <p>Enhancement of Perimeter Council Land</p> <ul style="list-style-type: none"> - Upgrade the pedestrian footpaths, infrastructure and landscaping on Council land immediately adjacent to the Proposed Development Site (Crescent Street and Woodville Road - with the precise boundaries of the relevant land to be agreed) to Council’s reasonable specifications. <p>Connectivity and Delivery of Open Space Vision</p> <ul style="list-style-type: none"> - Having regard to the significant material public benefits to be conferred under the proposed VPA (and as an inherent component of the Proposed Development itself), to the extent that any development consent for the Proposed Development requires the provision of contributions under Section 94 of the Environmental Planning and Assessment Act 1979, the value of those contributions is to be offset against the value of the public benefits listed above.



ATTACHMENT B

Our Ref: 16241

5 December 2016

Tiberius (Holroyd) Pty Ltd
Suite 8.01, Level,
1 Castlereagh Street,
SYDNEY NSW 2000

Attention: Mr Kurt Robinson

Dear Kurt,

RE: 1 CRESCENT STREET, HOLROYD – PLANNING PROPOSAL

We are writing to you regarding your recent request that the Transport Planning Partnership (TPPP) undertake a preliminary assessment of the traffic likely to be generated by the UrbanGrowth recommendations for the above site in the context of the Parramatta Road Urban Transformation Strategy 2016 (PRUTS).

Architectus has provided TPPP with the following analysis of the likely development outcome proposed for the UrbanGrowth site and they have assumed the site is developed for the highest and best use.

- Bulky goods - 39,000sqm GFA
- Mixed use:
 - 5200sqm GFA retail
 - 29500sqm GFA residential (approx. 343 apartments)

(N.B. Assumptions used are that the mixed use is divided into 0.3:1 retail and 1.7:1 residential and that there would be 86sqm GFA / apartment (this was the number used for the planning proposal and equates to approx. 73.25sqm NSA per apartment)

Based upon the above yields I have calculated the "UrbanGrowth" proposal could have generated up to 1958 trips in the PM peak hour

		Weekday PM peak Traffic Generation Rate	Weekday PM Peak hour traffic generation
Bulky Goods	39000	2.7 2.7 Traffic movements per 100m2 Allow for 25% multivisiting	790
Retail	5200	15.5 Traffic movements 15.5 per 10m2	806
Residential	343	0.29 0.29 trips per peak	99
		TOTAL	1695

My assessment has been based upon the following

<p>Bulky Goods (taken from RMS Guidelines to Traffic Generating Developments – Updated Traffic Surveys technical direction 2013)</p>	<p>Bulky goods retail stores</p> <p>Six surveys were conducted in 2009. Two of the surveys were conducted within the Sydney urban area (one electrical goods and one furniture) and four within regional New South Wales (two electrical goods and two furniture). Summary vehicle trip rates are as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>Weekday daily vehicle trips = 17 (including 1 heavy) vehicles per 100 m² of gross floor area Weekday peak hour vehicle trips = 2.7 vehicles per 100 m² of gross floor area. (note that the morning site peak hour during weekdays does not generally coincide with the network peak hour.) Weekend day daily vehicle trips = 19 vehicles per 100 m² of gross floor area (minimal heavy vehicles) Weekend day peak hour vehicle trips = 3.9 vehicles per 100 m² of gross floor area.</p> </div> <p>It is also noted that bulky goods sites generally have an area of 2000m² to 6000m² so a site with a size of 39,000m² would need to be comprised of up to 10 individual stores. Consequently, there would be likely to be an element of multi-visiting of around 25%.</p>
<p>Mixed Use (taken from GTA traffic report for Crescent Parklands)</p>	<p>Traffic generation estimates for the proposed mixed use development have been sourced from the <i>Guide to Traffic Generating Developments</i> (RMS 2002) & its supplementary technical direction (TDT 2013/04a). The following peak hour traffic generation rates have been used:</p> <ul style="list-style-type: none"> ○ High density residential flat buildings – 0.29 trips per unit for AM/PM (N.B. Whilst TDT 13/04a has suggested that traffic generation could be as low as 0.16 peak hours trips when close to a railway line, the trip generation at this site is likely to be higher) ○ Retail (supermarket) – 155 trips per 1,000m² for PM using the multiple regression equation for different trade categories

The traffic report for the Tiberius Planning Proposal estimated the traffic generation for the planning proposal as outlined below.

Development Generated Traffic	Peak Hour Traffic (vehicles per hour)	
	AM Peak Hour	PM Peak Hour
Residential	544	544
Retail	217	434
Showroom	7	14
Childcare centre	49	43
Gym	54	54
Office/Medical	15	29
Total	+ 886	+ 1118
Current Industrial Site Traffic	- 35	- 34
Resultant Increase	+ 851	+ 1084

It can therefore be concluded that based upon the preliminary analysis of the PRUTS recommendations, if developed to its highest and best use, the site would result in traffic impacts some 50% greater than the Planning Proposal. (1695 for the UrbanGrowth proposal as opposed to 1118 for the Tiberius Planning proposal).

There is no certainty that RMS or Transport for NSW will support this level of additional traffic impact.

It has been demonstrated that the Planning Proposal can provide a traffic outcome (predicated upon the balance of employment and residential development) with manageable traffic impacts supported by well-considered transport solutions.

I trust the above is clear but should you require any else, do not hesitate to call.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Hollyoak', with a large, stylized loop at the end.

Ken Hollyoak
Executive Director



ATTACHMENT C

5 December 2016

1 CRESCENT STREET, HOLROYD

MacroPlan has been asked to consider the implications of the proposed B5/B6 spilt zoning for the subject site, as suggested by the recently finalised *Parramatta Road Urban Transformation Strategy (PRUTS)*, November, 2016.

The proposed split zone differs from the R4 High Density Residential (with Commercial a permitted additional use) and B4 Mixed Use zoning suggested by the applicant as part of the current planning proposal.

MacroPlan has previously demonstrated how the controls and land use zoning proposed by the applicant support significant employment outcomes, underpinned by a mixed-use format with a residential component, and has conclusively addressed how the proposal meets the State Government's S.117 Directions.

Our January and March 2016 reports are attached. These reports and earlier work by MacroPlan articulate the evolving nature of employment and the need for flexibility in planning for employment change – similar sentiment to that expressed in the PRUTS.

Whilst our work is congruent with the PRUTS' identification of the need to densify, intensify and transition older employment zones to encourage new economy land uses, our work differs when it comes to nominating a specific zone for the subject site to deliver these outcomes. It is our opinion that the Urban Growth recommendations do not reflect the key principles of the PRUTS, insofar as they relate to the site's specific strategic merits and the public benefits the planning proposal will deliver.

Notably, our work demonstrates that the current B5 zoning, which reflects the bulk of the proposed split zoning for the site under the PRUTS, is not suited to the site because:

- There is already a large contingent of regional serving bulky goods retailing over a 5km stretch of Parramatta Road, almost immediately east of the subject site.
- The site's ability to accommodate many truck movements is compromised (noted in WesTrac's decision to leave the site).
- Although located on an arterial road, the site's exposure is limited. Its frontage is predominantly to Crescent Street – from Woodville Road, you drive past this site before you know it is there.

These site constraints in our opinion make it unsuitable for PRUTS to recommend continued industrial and/or bulky goods retailing uses, which we believe is neither suitable or feasible.

Our findings are consistent with those of the strategy's *Economic Analysis Report* which acknowledges the importance for bulky goods businesses to co-locate and cluster to increase efficiency, productivity and build economic resilience. In our view, the isolated nature of the subject site presents as a substantial barrier to its suitability for bulky goods retailing.

The PRUTS recommendations for multi-storey bulky goods at the site is not viable or feasible and detracts from the objectives of the strategy, i.e. it is more likely to encourage nothing to happen than to inspire employment change. This view is supported by the fact that, under the current zoning, no B5 redevelopment has occurred. Older industrial uses remain in the adjacent sites. These represent a lower order employment outcome for the precinct.

It is also noted that the PRUTS deems the adjoining land to the west, that is currently zoned B5, to transition to a medium density residential zoning, however no specific justification has been provided to support the split zoning on the site proposed by PRUTS.

Our view is independently supported by Colliers, who have provided an analysis of market appetite for bulky goods development at the site and found that the site is "unsuitable to attract LFR (large format retailing) and related industry, and the preliminary development feasibility demonstrates the rentals are not economical to support a successful and market resilient centre, whether immediately or in the long term".

Since our initial work we have also considered the suitability of the proposed B6 zoning, suggested by PRUTS to be applied to that part of the site which is not serviced by the Woodville Road corridor. We believe this zoning is misplaced and that Crescent Street can hardly be defined as an 'enterprise corridor', such that its appeal to a range of 'corridor-based' uses is doubtful.

In summary, our work identifies that there is a lack of scale and suitability for the B5 zone and bulky goods uses to be delivered by the market, and that is simply not a feasible or viable outcome for the site. By association, the adjacent B6 zone also becomes difficult to deliver and potentially irrelevant.

Our view is that site redevelopment to support a range of commercial, retail and other employment uses needs to be underpinned by a scale of residential development to enable redevelopment.

The planning proposal to rezone the land to B4 is accompanied by a commitment to deliver a substantial amount of employment floorspace (13,000m²). This outcome is guaranteed for the site and is an integral component of the proposed redevelopment delivery. The proposed format offers the flexibility that PRUTS identifies as a necessary ingredient for new employment evolution and represents a substantial down-payment which secures the employment relevance of the site into the future.

Further, we note that the B5 zone is applied by the PRUTS in a limited number of other locations. It is used at Pyrmont Bridge Road and at Crescent Street. Interestingly, whilst the

strategy identifies Auburn as the prime bulky goods location in the corridor, it suggests a B6 zoning for this area.

Overall, we find that PRUTS generally accepts that the current zoning structure is not suited to logistics uses and unlikely to encourage new employment outcomes and innovative market responses to new demand. We agree with this sentiment but differ in the choice of zones considered appropriate to make an employment difference at the subject site.

In our view the B4 zoning is most likely to achieve the Strategy's intentions.

A B4 zone is utilised, for instance, for land immediately east of the industrial wedge at the junction of Parramatta and Woodville Roads (also located in the Granville precinct). Further, we find that the B5 zone is used sparingly for other precincts within the corridor. Notably, it is not used at all for the Auburn precinct which accommodates the largest cluster of bulky goods retailing for the length of the corridor.

Yours sincerely,



Wayne Gersbach
General Manager – NSW

18 March 2016

Holroyd City Council
PO Box 42
Merrylands NSW 2160

Dear Council,

Planning Proposal – Economic Justification – 1 Crescent Street, Holroyd

MacroPlan Dimasi has been asked to prepare a formal response to address the issues and inaccuracies within the Council officers planning report for the above Planning Proposal, and reconfirm its findings.

Firstly, we acknowledge that the proposal Masterplan has been amended to also include “Commercial Premises” as an additional permitted use in the R4 zone. This change is to ensure further flexibility and an additional employment upside for the proposal. The Masterplan identifies an additional 3,000m² of commercial space to the western portion of the site with the applicant committing to a minimum of an additional 1,500m² of employment GFA as part of the 3,000m². This would increase potential employment densities by 50-90 full time jobs.

Secondly, we have reviewed the independent Council commissioned Hill PDA assessment and for the most part Hill PDA, in our opinion; agree with our conclusions reached and our assessment rationale. Hill PDA supports the jobs growth conclusions, and furthermore acknowledged our conservative assessment of floorspace employment which Hill PDA considers to be greater. We note, this is not reflected within Council officer’s report and in fact presented to the contrary.

The Economic Impact Assessment (**EIA**) and supplementary information that has been provided to Holroyd Council, has conclusively demonstrated:

- The proposal and subsequent development would deliver a superior employment outcome accommodating between 227 – 308 full time equivalent jobs on the site, as well as additional indirect employment. This will provide an increase in direct jobs and benefits to the Holroyd LGA. We note Hill PDA determined the jobs

recommended outcome for the proposal is between 323 – 359 jobs, demonstrating the conservative approach taken by MacroPlan.

- The Proposal does not advocate the loss of employment land, rather the re-characterisation of the type of employment land use to ensure we maintain and enhance the sites employment relevance with the future needs of the market.
- The Proposal is consist with the relevant planning strategies and policies and will not impact on the achievement of the subregion/region and Holroyd LGA employment capacity targets and employment objectives.
- The subject site is not contributing to a significant industry cluster or within a defined industrial precinct and The “Holroyd Industrial Precinct” and “GSEL West” area referenced by Council is not defined in any Local, Sub Regional, Regional or State strategy, policy or Environmental Plan;
- The proposed rezoning will not impact employment land stocks. Within its urban context, the site has a number of constraints which deem it unsustainable for continued industrial use, or alternate feasible bulky good retail operations.

We reconfirm the proposal adheres to the 117 Directions for Industrial and Business Zones Objectives and Requirements, and we response to Councils assessment in this regard in Attachment 1.

Holroyd Council Officers Report

It is our view the assumptions and statements made within the Council officer’s report do not fully consider or understand all material presented by MacroPlan, and misinterpret Councils own peer review response provided by Hill PDA. A copy of the Hill PDA report had been requested since it was completed in September 2015 however a copy was only provided in February 2016. Furthermore, our client has offered to meet with Hill PDA and Council to address any issues which has not been facilitated.

In our opinion Council officers have not acknowledged;

- That our assessment addresses the full permitted range of employment uses under the current B5 zone and not just limited to bulky goods retail which is specifically annotated in Holroyd Council’s Economic Development Strategy;
- The potential use of the site fa a multi-level bulky goods is not viable or feasible as detailed in our MacroPlan addendum in January 2016;

- The MacroPlan EIA and Hill PDA assessment have concluded that the proposal will create improved jobs growth for the area;
- The subject site's employment importance and commercial relevance including the market potential will be maintained; and
- The proposal is consistent with State and local policies;

We acknowledge that Hill PDA has identified a 'possible' exception in our assessment regarding an absolute retention of business and industrial zoned land. However, we hold a contrary view and it is our opinion the proposal has appropriately addressed the retention of business lands through a more important element 'protecting employment'.

As also noted by Hill PDA, the area to south of the subject site, that is, the former Brickworks site now known as the Holroyd Gardens development was rezoned to allow for medium to high density residential which is consistent with the proposal and in that case without retention of relevant employment.

Nonetheless, while the proposal may result in a small loss in the overall floor space of business land, as our report clearly outlines the proposal will generate an equivalent or greater job outcome and create an improvement in employment opportunities and jobs growth for the area. This is also recognised and agreed with in the Hill PDA review.

The officers state, Hill PDA considered that the current MacroPlan assessment to be understated, however the Council report does not acknowledge that Hill PDA go on to state that potential options '*may not be viable*'. This discussion related to potential multi-level bulky goods, such as a Bunnings or Masters, and it is clear that Hill PDA were not provided our January addendum which addressed this point categorically.

A response was provided to Council officers regarding a multi-level bulky goods assessment. As stated this is a specialised type of development and in our opinion extremely unlikely in this location. This can be seen from the exceedingly limited supply of this type of development within the Sydney market. Examples include IKEA, and Costco, neither likely to be located at the subject site.

It was also accepted that a single level Bunnings could locate at the subject site however the Bunnings retail model has a significantly reduced floor space (well below the assumptions by Council officers) and more importantly has a jobs outcome of only

between 120-150 jobs. It is also our opinion that due to the following factors Bunnings or similar would not operate from the subject site.

- These types of premises, operators look for opportunity to extract cost savings from operations. Whether attained in the form of a reduced employee head count (consolidation of overlapping business functions), centralised logistics & infrastructure utilisation, co-location with wholesale trading partners, opportunity to customise premises or simply cheaper rental rates. Simply, the job intensity of bulky goods, warehouse and logistic has decreased sharply.
- From a construction and feasibility perspective, a large-scale site enables the absorption of fixed costs incurred throughout the development. Fixed costs include those pertaining to design and planning, site remediation and demolition works, local road and pavement upgrades and landscaping. In order to offset these front-loaded costs, more revenue is required during the operational phase and to this end achieved through greater density and scale.

This argument is further justified within the Hill PDA review which states;

'Hill PDA do acknowledge that the potential for bulky goods retailing may be limited due to strong offers currently provided at Auburn, East Blacktown, North Parramatta and Prospect. Furthermore these competitive centres are superior in terms of accessibility.'

Overall the subject site's limited potential is unlikely to deliver the necessary employment and that the redevelopment of the subject site for an industrial or B5 zoning purpose would not be feasible or deliver an employment outcome that proposal can.

There are a number of considerations within the officer's report which relate to alternative zones. This is not what the proposal is applying for, nor is it a requirement under the Department of Planning's 'A Guide to preparing planning proposals'. It has been clearly justified that the proposal is consistent with Section 117 directions, protects jobs and business land and provides for growth in jobs.

The proposed rezoning is consistent with State and region strategies on the future role of business lands by delivering a superior employment outcome. It has been clearly established in the EIA, and this addendum that the proposed development will result in

the re-characterisation of the employment uses on the site to be better aligned with the future needs of the market. Redevelopment for the specific purposes of retail and commercial services will provide an equivalent or greater employment outcome that will benefit the Holroyd LGA as a whole.

Yours sincerely,



KONRAD GRINLAUBS

Senior Planner

Attachment 1

In regards to Section 117 directions the following table is an extract from the Council officer report with MacroPlans response;

117 Direction Industrial and Business Zones Objectives and Requirements		
Objectives	Council Assessment	MPD Assessment
(a) Encourage employment growth in suitable locations,	Not Consistent - there is an undersupply and demand for employment land and space in proximity to the Parramatta CBD and Granville Town Centre	Consistent – It is clearly shown that the proposal will encourage employment growth, which Hill PDA also concurs. Furthermore the suitability of the land for uses other than permitted under the current zoning is appropriately identified and provided for under the proposal.
(b) Protect employment land in business and industrial zones	Not Consistent – reduces a business zone and impacts on adjoining IN2 and B5 Land and thus affects the viability of an established employment precinct in a location supporting a strategic centre	Consistent – Employment land is protected with the proposal through the B4 zoning and provision of 10,000m ² of employment GFA. The amended proposal is also seeking to add “Commercial Premises” as an additional permitted use in the R4 zone area to ensure flexibility and additional employment upside for the proposal. It is accepted that the overall business land area will decrease however the proposal will generate and create an improvement in employment opportunities and jobs growth for the area. This is also recognised and agreed with, in the Hill PDA review. There is no evidence to suggest there are adverse impacts on adjoining IN2 and B5 land or the viability of a supporting strategic centre. To the contrary the proposal has identified

		competitive effects would be minor and have little or no effect on trading health.
(c) Support the viability of identified strategic centres	Not Consistent - reduces the total amount of employment land in the vicinity of Parramatta CBD and the Granville Town Centre while not demonstrating that employment activities are not feasible or any practical long term equivalent jobs benefit that offset the loss of zoned employment land	<p>Consistent – The proposal will maintain employment land however the overall business land area will decrease, but the proposal will generate and create an improvement in employment opportunities and create jobs growth for the area. This is recognised and agreed by Hill PDA review.</p> <p>The proposal will improve competition the proposal has identified competitive effects would be relatively minor and have little or no effect on trading health of strategic centres.</p>
A Planning Proposal must		
(a) Give effect to the objectives of this direction	Not Consistent – see above	Consistent – see above
(b) Retain the areas and locations of existing business and industrial zones	Not Consistent - reduces the area of an existing B5 business zone by 2/3 thirds which is irretrievably lost for future employment generating land uses. The location of a B5 zone is eliminated and impacts on the viability of the GSEL West Area and negatively impacting on the availability employment lands in proximity to the Parramatta Strategic Centre	<p>Consistent – Employment land is protected with the proposal through the B4 zoning and provision of 10,00m² of employment GFA.</p> <p>It is accepted that the overall business land area will decrease however the proposal will generate and create an improvement in employment opportunities and jobs growth for the area. This is also recognised and agreed with, in the Hill PDA review.</p> <p>There is no evidence to suggest there are adverse impacts on the B5 zone.</p> <p>The GSEL west area is not an identified precinct but an area identified by council officers. Councils reliance on the Draft West Central</p>

		<p>Subregional Strategy 2007 does not support its position given the Strategy outlines the Future Role of Employment Lands in West Central Subregion, including Land to be Retained for Industrial Purposes and Land to be retained for wider range of employment uses. Holroyd is the only LGA not earmarked to contribute to future employment lands within the sub-region. Furthermore, of the 61,000 jobs that were to be created under that Strategy only 1,000 of those were earmarked for Holroyd.</p> <p>The proposal supports the objectives of the Strategic centres it pivots.</p>
<p>(c) Not reduce the total potential floor space area for employment uses and related public services in business zones.</p>	<p>Not Consistent - Reduces the potential floor space area of a business zone from 38,700m² to 8,500m². This is less than the current floor space of the building (which is an underdevelopment of the site) of 9,700m² and significantly less than the potential developable area of 19,350m² used by the EIA to model the potential job potential of the existing B5 Zone.</p>	<p>Consistent – It is inaccurate to suggest the potential floor space of the subject site is 38,700m².</p> <p>Taking into consideration site layout, access, and functionality and feasibility terms, delivering above 100% FSR over the site is not achievable.</p> <p>This represents an expensive proposition, greatly increased costs of development and unsupportable by market rentals.</p> <p>It is expected that any project feasibility would be significantly compromised to a level where a new building could not be justified on economic grounds.</p> <p>However as note above the proposal will generate and create an improvement in employment opportunities</p>

		and jobs growth for the area. This is also recognised and agreed with, in the Hill PDA review.
(d) Ensure that proposed new employment areas are in accordance with a strategy that is approved by the Director-General of the Department of Planning.	Not consistent - The reduction of the GSEL is not identified in any strategy approved by the Director General and the land remains identified for retention in the Draft West Central Sub-regional Strategy for retention, is identified in the ELDP. and is not located in the Greater Parramatta Area under the a Plan for Growing Sydney	Consistent – The proposal is not a new employment area but a re-allocation of employment land that will improve job supply for the surrounding area.
It A Planning Proposal may be inconsistent with the this direction only if it		
(a) is justified by a strategy which gives consideration to the objective of this direction, and is approved by Director-General of the Department of Planning, or	No	The proposal in not considered to be inconsistent for the above reasons.
(b) is justified by a study (prepared in support of the planning proposal) which gives consideration to the objective of this direction, or	No - The EIA is not considered to satisfy the requirements of strategy for the purposes of the 117 Direction because of limitations in its scope and methodology	<p>The proposal will;</p> <ul style="list-style-type: none"> • Provide for employment growth within business land. • Protect employment by maintaining business land • Is justified by a considered study which has appropriately considered the directions; and • Is in accordance with Regional and Sub-Regional Strategies, clearly identified by Hill PDA. <p>The EIA does justify the proposal and clarifies the proposal meets the objectives of the direction</p>
(c) is in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or	Not Consistent – the land is identified in the Draft West Central Sub-regional Strategy for retention as employment generation land	Consistent – As identified above the proposal does maintain the employment land however will generate and create an improvement in employment opportunities and jobs growth for the area.

<p>(d) is of minor significance.</p>	<p>Not Consistent - the matter is not of minor significance as it reduces the area of the GSEL and impacts the continued viability of the GSEL West Area and is not consistent with the Draft New Parramatta Road Strategy</p>	<p>Consistent – The matter is of minor significance given the proposal will generate and create an improvement in employment opportunities and jobs growth for the area.</p> <p>The GSEL is not an identified precinct.</p> <p>The proposal is consistent with the Draft Parramatta Road Urban Transformation Strategy in delivering open space, employment, urban activation and upgrades and improvements to the road network and connections to public transport.</p>
--------------------------------------	---	---

Economic Impact Assessment

Addendum

1 Crescent Street

Holroyd

January 2016

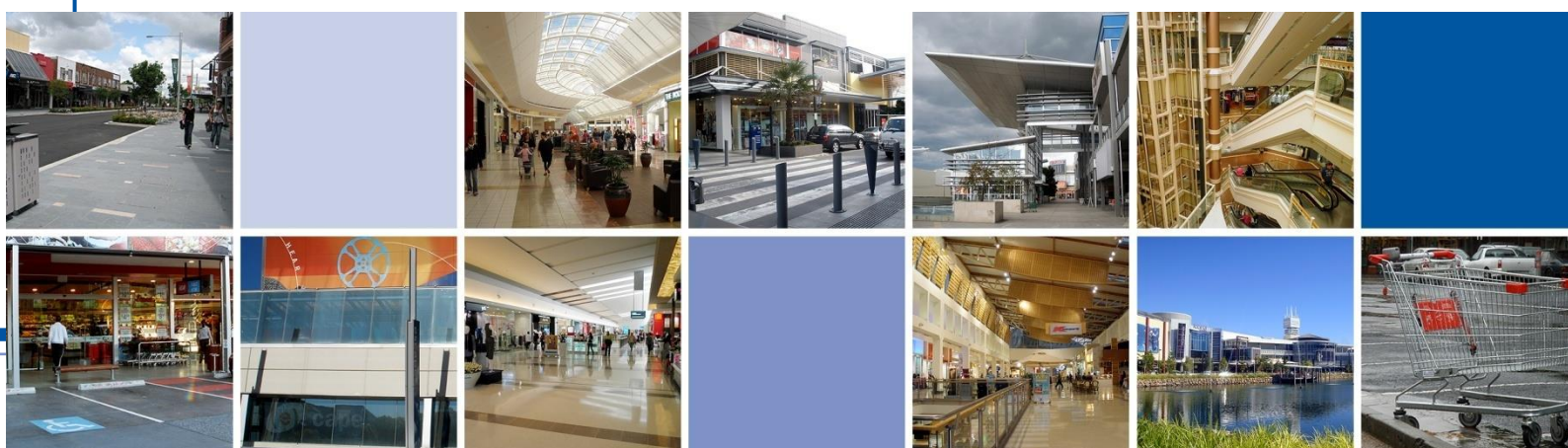


Table of contents

INTRODUCTION	3
AS IS (No development)	6
RE-USE POTENTIAL FOR LIGHT INDUSTRIAL PURPOSES	9
EMPLOYMENT	13
CONCLUSION	16

Prepared for:

Tiberius (Holroyd) Pty Ltd

MacroPlan Dimasi staff responsible for this report:

Wayne Gersbach – General Manager (NSW)

Konrad Grinlaubs – Senior Planner

Jason Anderson – Chief Economist

Addendum

INTRODUCTION

MacroPlan Dimasi has been asked to address concerns raised by Council relating to the Economic Impact Assessment (EIA), dated June 2015, and included as part of the Planning Proposal for 1 Crescent Street, Holroyd. This report further addresses in detail the requirements of Section 117 Directions.

This addendum in simple terms provides additional assessment of the market potential for the site and the potential current and future employment capacity and responds to the Holroyd Council letter.

Firstly, MPD strongly disagrees with the assumptions and statements made in Council's letter dated 11 December 2015 in relation to the EIA, being;

- The EIA does not address the full range of employment activities;
- Heavily favours residential uses;
- That the EIA is required to develop concepts and built forms;
- That the EIA is required to take into account other employment zones; and
- That the job forecasts did not offer real benefit.

The June 2015 EIA evaluated the subject site's employment importance and commercial relevance including the market potential of the site under three alternative scenarios, namely:

1. An "As Is" case i.e. no development;
2. Re-use potential for light industrial purposes under B5 zoning; and
3. New site development under the B5 zoning.

The EIA further examined the potential employment capacity of the site under its current zoning and compared that of the proposed new land use allocations i.e. compared the current levels of employment at the site (WesTrac workers and/or B5 theoretical development) and the employment presented by the new land uses.

Despite the detailed analysis provided, this addendum provides additional testing to the **current and future** opportunities for the subject site. Using a consistent structure we have broken this additional response into the following;

1. "As Is" i.e. no development;
2. Re-use potential under the B5 zoning; and
3. Employment.

Overall the subject sites employment relevance in our view has changed considerably since it was originally developed for its current purpose. As concluded and outlined in the original EIA, the site employment relevance is compromised and the case for the planning proposal and redevelopment of the site is compelling.

AS IS (No development)

The building was originally custom-built for a niche purpose i.e. sales, display, service and distribution of large industrial machinery. Finding a replacement tenant for the current building is expected to be a challenging prospect without major modification and refurbishment works. Targeting a limited market is a major constraint when attempting to re-tenant any premise. Extending the spectrum of potential users and uses to include light industrial, and/or a business permitted under the B5 zoning, we remain of the view the site is constrained.

Firstly, potential users will need to pay commercial rents for the subject site, which in this location are significantly higher than rents paid in other industrial locations. This was clearly articulated within the original EIA, refer page 95.

Operational floorspace of the subject site.

Building Use	Area (m ²)
Workshop	3,912
Warehouse	1,862
Office (ground floor)	1,661
Office (first floor)	1,616
Plant room	350
Mezzanine	27
Stairs	22
Gatehouse	18
Other	2
Total	9,471

Source: McKenzie Group (2015)

Furthermore, there is no incentive for an industrial user to take up an industrial lease at 1 Crescent Street relative to key industrial locations in greater Western Sydney. Factors

such as road infrastructure connecting sites, users external markets and suppliers and labour access will all play a part in a business consideration to locate at the subject site. Another consideration is the fact the site is heavily constrained and a less than preferable location for industrial users with constant logistical requirements.

In its current state, the building is not suitable for contemporary industrial or commercial operations. The building spans over two levels, with a portion of its floorspace capacity dedicated to maintenance and servicing operations. Overall, the existing internal configuration would be difficult to strata, and more importantly, does not offer the necessary scale to support investment.

Furthermore the current building format is not consistent with current contemporary building attributes; being:

- Not of A-grade quality;
- Not designed for contemporary multi-purpose practices; and
- Does not offer a range of floor plate or strata options.

From a competition standpoint, newer buildings will more likely be favoured in established clusters of industrial precincts where complementary services also exist, to service employees and provide more direct connections to supply-chain networks. The subject site's relevance in its current form is considered to be an inferior location and not sustainable.

Overall, given the sites location and availability of better-connected locations, it is evident that the subject site is clearly inferior, and there is very limited potential to find a tenant looking for re-use, light industrial or another B5 zone user.

RE-USE POTENTIAL FOR B5 ZONING PURPOSES

At present, the current B5 zoning permits (with consent) bulky goods premises, child care centres, food and drinks premises and light industrial uses. Council have identified the site as "Bulky Good Retail" in its Economic Strategy 2014. On review of Map 1 in this strategy (refer page 7) the site is not identified as either a Commercial or Industrial Centre, nor is it a cluster of employment lands.

We note bulky goods retailers were reviewed in the original EIA and that Council have stated that the level of Gross Floor Area (GFA) used in this assessment was insufficient and that development potential could be maximised to two storey meeting current Floor Space Ratio (FSR) provisions. With regard to Council's views we note:

- Bulky Good Centres generally achieve a maximum FSR of 50% given truck manoeuvrability, landscaping and parking requirements, and the existing 15m height controls under the B5 zoning will generally not permit a two level bulky good centre;
- The economic return from a bulky good centre will not support the development of basement parking;
- Furthermore, basement parking is not a preferred layout for bulky good operators, nor are two level centres given the greater level of outgoings and operating costs that has to be absorbed by tenants for common areas;
- Light industrial uses are generally to a maximum FSR of 60% given truck manoeuvrability and parking requirements; and
- A combination of these two uses (bulky goods and light industrial) could not achieve an FSR on site of greater than 60%

Having regard to these key points, this is the basis on which the additional employment outcomes have been assessed.

As previously stated on page 96 of the EIA these bulky goods centres tend to be co-located in large complexes (or 'centres') or along major arterial roads. In Western Sydney, these standalone complexes generally require larger sites, in the order of 4+ hectares. Moreover, given that there is already considerable representation from bulky goods operators along Parramatta and Woodville Roads, the market potential or gap for another standalone bulky goods destination is questionable, and not necessarily aligned to the relevant Planning policies and strategies.

Nonetheless, we have undertaken a further examination of market acceptance based on maximising current FSR allowance of 1:1 as mentioned by Council and the feasibility of such considerations.

While not solely related to bulky goods but all industrial activity, there are industry changes to operations and infrastructure investment that has influenced the type and location of this type of industrial occupation. These changes include the management of the supply chains and industry or common use consolidations. These changes have both greatly contributed to demand for new light industrial premises to be able to operate and deliver greater efficiencies and facilitate the consolidation of business functions at one centralised location. In turn, businesses have opted to operate warehouse and logistics services at very large sites in outer ring areas – particularly along the M7 corridor.

The previous need to have an extensive distribution operations and warehouse networks throughout Sydney has diminished. In fact, market forces are coercing many existing light industrial operators into deploying streamlined supply-chain networks. Slimmer inventory management practices have reduced the demand for industrial floorspace, particularly at more expensive node locations in established markets, where competition from other land uses is apparent.

Consolidation of fragmented premises, offers operators the opportunity to extract cost savings from operations. Whether attained in the form of a reduced employee head count (consolidation of overlapping business functions), centralised logistics & infrastructure utilisation, co-location with wholesale trading partners, opportunity to customise premises or simply cheaper rental rates. Simply, the job intensity of major warehouse and logistic centres has decreased sharply.

The location of the subject site will likely also result in higher operating costs for a light industrial tenant or operator due to the sites connection to the Sydney Orbital Road system. Delays and potential business inefficiencies and a host of safety issues associated with this congestion particularly for larger vehicle movements are relevant to the subject site. These negative influences are not evident on the M7 corridor, as the scale of the motorway network is much greater

As an inferior light industrial location, a redeveloped strata titles business park will be subject to slower take-up and pressure for cheaper rents that compromise viability and sustainability, which in turn, delays the receipt of revenues. As such, it is expected that

a development layout aimed at delivering industrial floorspace at the subject site would not be pursued.

As part of the bulky goods considerations the following information has been obtained from LFRA (Large Format Retailers Association) website regarding current operating models for these types of businesses and is considered to further support our case and relative assumptions.

The planning and development of large format retail premises should ensure the best outcomes occur for everyone involved. Important planning considerations include:

- *A large, flat site to accommodate a large format building, on-site parking, vehicular access for both customer and delivery, and landscaping.*
- *Good site exposure to passing traffic with location on a major arterial road or with convenient access to the major arterial road network.*
- *Affordable and sustainable rents in line with the retailers' business strategies to permit the display and storage of large items.*
- *A suitably designed site and building that safely accommodates the delivery of stock by large commercial vehicles and the loading/collection of bulky goods by customers.*
- *A site which can conveniently and safely accommodate up to 40 trucks and semi-trailers per retailer per day.*
- *A customer car parking ratio of at least 3 spaces per 100 square metres of floor space.*
- *Suitably located premises to serve a wide regional catchment of over 100,000 residents, with some of the larger stores requiring catchments of 150,000 plus.*
- *Co-location with other large format retailers.*
- *A considered mix of retailers that promotes the long-term success of the development.*

Many of the provisions noted above will be significantly compromised due to the site's location, position and layout, access and ability to accommodate car parking, landscaping and large vehicle manoeuvring. This in our view strongly supports the conclusion that the subject site is not a viable bulky goods option or other types of light industry options.

From a construction perspective, a large-scale site (4 hectares or more) enables the absorption of fixed costs incurred throughout the development. Fixed costs include those pertaining to design and planning, site remediation and demolition works, local road and pavement upgrades and landscaping. In order to offset these front-loaded costs, more revenue is required during the operational phase and to this end achieved through greater density and scale.

The subject site's relatively limited floorspace potential does not deliver the necessary scale to mitigate the 'fixed' costs of development. As a result, it is evident that the redevelopment of the subject site for an industrial or B5 zoning purpose is not feasible.

In cost terms, delivering above 0.5 FSR over the site for bulky goods, it will be necessary to deliver car parking below ground. This represents an expensive proposition, greatly increasing the cost of development that can't be supported by market rentals that these types of development attract. According to the Rawlinsons Australian Construction Handbook (2015), the average cost of underground car parking in Sydney is between \$52,100 and \$56,200 per space. As a result, it is expected that any project feasibility would be significantly compromised to a level where such a building could not be justified on economic grounds, given these construction costs alone.

Overall, given the sites attributes, it is evident that redevelopment of the subject site is clearly limited from an economic and feasibility stand point. Potential development of the site for light industrial or another B5 zone user at a high FSR of closer to 100% is greatly compromised and very unlikely.

EMPLOYMENT

Once vacated and if left undeveloped, it is our belief the subject sites employment relevance will further diminish (particularly as the premise continues to age). Re-tenanting the site for industrial uses as mentioned above will prove difficult, reinforced by its location and rent relative to other industrial locations in Greater Sydney.

Redevelopment under current planning controls (B5 Business Development) is unlikely as Bulky goods and/or light industrial premises as they tend to occupy larger floor plates in co-location with other retail and commercial premises.

Subsequently, a favourable employment outcome can be achieved through redevelopment of the subject site in a B4 Mixed Use and will provide a superior outcome from the economic and employment perspective.

Nonetheless, for reference purposes, , we have re-modelled the potential employment outcomes for the site if it was developed for light industrial (75% FSR), and bulky goods (50% FSR) and theoretical 50/50 light industry bulky goods (at 60% FSR). The maximum employment floorspace that could be attained from the site is 38,700m² assuming 100% FSR.

Employment Outcomes – B5

Potential Land Use Type	Area (m ²)	m ² /employee	Employment Outcome (Jobs)
Existing (WesTrac)	9,471	70	135
Bulky Goods (50%)	19,350	60 – 80	242 – 322
Light Industry (75%)	29,025	100 – 200	145 – 290
Bulky Goods/Light Industry (60%)			
BG	11,610	60 – 80	145 – 193
LI	11,610	100 – 200	58 – 116
			203 – 309

Source: MacroPlan Dimasi (2015)

Overall the existing and potential employment outcome ranges between 135 – 322 jobs. The upper limit jobs excludes economic factors, and the likelihood of redevelopment, which factors in prospective development costs, rents and locational attributes and access. It is our opinion that an appropriate upper level of employment achievable for the site would range between 150 – 200 jobs under current site conditions and B5 controls.

The proposed planning proposal as it stands indicates a commercial floor space yield of 8,500m² (10,000m² GFA). Specific uses proposed are as follows:

- Retail (supermarket) – 3,500m²
- Retail (Specialty) – 1,400m²
- Retail (showroom) – 2,000m²
- Other commercial – 1,600m²

Given the level of detail that Council is seeking, we have re-assessed the employment outcome for the site based on granular analysis of the proposed uses, rather than the conservative grouped employment uses previously undertaken.

With regard for average employment densities of candidate uses, we have derived an employment outcome of 227 – 308 workers, which we note is higher than the conservative approach taken in the EIA.

Employment Outcome – B4

Use	Area (m ²)	m ² /employee	Employment Outcome (Jobs)
Supermarket	3,500	30 – 40	88 – 117
Specialty Retail	1,400	15 – 25	56 – 93
Other Commercial	1,600	25 – 30	54 – 64
Retail/Showroom	2,000	60 – 70	29 – 34
Total	8,500	-	227 – 308

Source: MacroPlan Dimasi (2015)

The provision of superior quality commercial and retail floorspace is expected to attract a different profile of tenants and businesses, which typically engage more workers per square metre.

In addition to direct employment benefits outlined, there are also a number of indirect employment outcomes that would be derived from the proposed development. These benefits include:

- A realignment of the industry composition to suit the working resident population and subsequently greater self-containment;
- Greater industry diversification;
- A reduced reliance on vehicle service and sales in the immediate area;

- The proposed development includes approximately 1,800 and 1,900 residential units, resulting in an increased number of households and subsequently, greater overall expenditure;
- Support of various professional service industries during the planning and design phase e.g. consulting, architecture, engineering, planning and so forth.
- Support a large and diverse range of trade, professional and construction-based businesses e.g. construction managers, labourers, bricklayers, surveyors as well as plumbers, electricians, heating and ventilation trades.
- Support maintenance and trade service employment once operational.

Moreover, with regard to a simple multiplier, indirect employment outcomes tend to be higher in service-oriented businesses (e.g. food catering; cleaning services; support services) than in businesses that trade in goods.

The proposal and development would deliver a superior employment outcome accommodating between 227 – 308 jobs on the site as well as indirect employment. This would, in our view, provide a comparable employment outcome and more likely an increase in direct jobs and benefits to the Holroyd LGA as a whole.

CONCLUSION

Overall, given the sites attributes, it is evident that the subject site is clearly limited from an economic and feasibility stand point. Potential redevelopment of the site for light industrial or another B5 zone user is greatly compromised and unlikely. The site locational attributes do not provide close or direct access to key economic infrastructure with the exception of rail infrastructure supporting residential catchments. Location and availability of better-connected sites is evidence that the subject site is clearly inferior and the limited potential tenant user looking for re-use, light industrial or another B5 zone user.

The site is not considered to contribute to a significant industry cluster and is difficult to access due to the combination of major road and rail infrastructure. The sites employment relevance has in our view changed considerably since it was originally developed, and the proposed Parramatta Road Corridor revitalisation makes the redevelopment of the site is compelling.

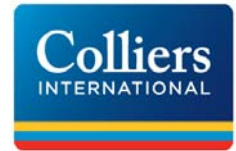
The proposed rezoning is consistent with State and region strategies on the future role of business lands by delivering a superior employment outcome. It has been clearly established in the EIA, and this addendum that the proposed development will result in the re-characterisation of the employment uses on the site to be better aligned with the future needs of the market. Redevelopment for the specific purposes of retail and commercial services will provide an equivalent or greater employment outcome that will benefit the Holroyd LGA as a whole.



ATTACHMENT D

Large Format Review

1 Crescent St, Holroyd



EXECUTIVE SUMMARY

Colliers International (**Colliers**) was asked by Tiberius (Holroyd) Pty Ltd (the **Client**), to review the site located at 1 Crescent Street, Holroyd to consider the viability of Large Format Retail (**LFR**), also referred to as Bulky Goods Retail, and B5 Business Development related uses.

The review has focused on addressing two critical aspects that underpin the success of any development of this nature, being:

1. The suitability of the site and its ability to cater for LFR and supplementary uses associated with “B5 Business Development”; and
2. The feasibility and resultant rentals from the development of the centre.

The conclusion of this review is the site and its constraints deem it unsuitable to attract LFR and related industry, and the preliminary development feasibility demonstrates the rentals are not economical to support a successful and market resilient centre, whether immediately or in the long term.

A critical aspect of any LFR location is the ability to co-locate in clusters of similar industry, and the stand alone nature of this site, coupled with its constraints, will not support the uses we understand have been proposed as part of the Parramatta Road Urban Transformation Strategy 2016 (**PRUTS**).

By way of background, Colliers run a dedicated LFR team with over 48 years combined experience working in the sector, including the Parramatta Road market. We have in depth knowledge of the location, an intimate knowledge of the business model requirements of LFR, and dominate Sydney’s LFR transactions both in leasing and sales.

SITE CONTEXT

The Client has confirmed the site is located in the “Frame Area” of the recently released PRUTS.

We are informed that NSW UrbanGrowth has made recommendations in the PRUTS to essentially split the site zoning with “B6 Enterprise” (Residential) adjoining “B5 Business Development”, which the highest and best use is assumed to be LFR (Bulky goods retailing). Colliers has reviewed and is commenting on the B5 zone only in this document.



WHAT DO LFR RETAILERS REQUIRE FROM A SITE?

The preference and most suitable LFR site comprises an on-grade open plan layout centre with direct parking at the front of each tenancy and rear loading to all shops at the rear. Where land is scarce or high value, internal centres have been developed to occupy a smaller footprint, however this comes at a cost in construction and therefore rents which often make them unfeasible.

The industry body known as the "Large Format Retail Association" which formed in 1999, sets out key principles that are important in the planning and development of large format retail premises to ensure the best outcomes for everyone involved. *"Important planning considerations include:*

- *A large, flat site to accommodate a large format building, on-site parking, vehicular access for both customer and delivery, and landscaping.*
- *Good site exposure to passing traffic with location on a major arterial road or with convenient access to the major arterial road network.*
- *Affordable and sustainable rents in line with the retailers' business strategies to permit the display and storage of large items.*
- *A suitably designed site and building that safely accommodates the delivery of stock by large commercial vehicles and the loading/collection of bulky goods by customers.*
- *A site which can conveniently and safely accommodate up to 40 trucks and semi-trailers per retailer per day.*
- *A customer car parking ratio of at least 3 spaces per 100 square metres of floor space.*
- *Suitably located premises to serve a wide regional catchment of over 100,000 residents, with some of the larger stores requiring catchments of 150,000 plus.*
- *Co-location with other large format retailers"*

Colliers view is the site does not achieve a majority of these principles which are critical to deliver successful and resilient LFR centres. The sites heavy vehicle access is challenging to say the least and the centre would have significant traffic impacts at a known "pinch point" on the corner of Parramatta and Woodville roads.

Furthermore, it will be standalone and separated from the key Auburn LFR cluster, would require significant basement parking which is not feasible or preferred by retailers or their customers, and the Client would have to build an internal centre which will be unfeasible as the economic rents required to do so will result in rents significantly above market parameters.

PARRAMATTA ROAD CORRIDOR RENTS

As outlined, Colliers are the market leading agency in LFR and have intimate understanding of market demand, supply and rentals being achieved. Provided below is a list of recent deals and the current rents being achieved in the Auburn area, which is an established and preferred location of LFR in this region of Sydney.

Due to confidentiality requirements with the landowners and retailers we are unable to confirm the names of these groups, however would be share them in a face to face meeting if required.

Large Format Review

1 Crescent St, Holroyd



Major Furniture	3,000 m2	\$185 per m2
Major Furniture	2,060 m2	\$153 per m2
Major Furniture	2,500 m2	\$173 per m2
Major Electrical	2,650 m2	\$120 per m2
Major Furniture	2,800 m2	\$230 per m2

Rents range due to a range of factors including location, access, building layout and surrounding similar users which drive economics. As demonstrated above, net rentals generally fall between \$120/sqm - \$175/sqm and incentives vary dependent on the lessee and market conditions at the time.

SITE FEASIBILITY

Based upon the PRUTS recommendations, the client would need to build an internal multi-level centre. Colliers have adopted the following development metrics assuming LFR as the highest and best use for the site.

Site Area: 21,000sqm (approx.)

Building Area: 39,000sqm (building area would need to assume multi-level basement parking and given the site constraints truck accessibility will be a potential significant issue)

Levels: Four Storeys (highly unusual and untested in terms of format)

- Clients Holding Land Cost: \$21,000,000 (\$1,000/sqm)
- Civil/Remediation: Unknown
- All in Build Cost: \$97,500,000 (\$2,500/sqm)
- Basement Carpark: \$18,500,000 (allowance for 11,000sqm @ \$1,650/sqm)
- Contingency: \$6,850,000 (5%)
- Total Cost: \$143,850,000 (Approximate)

The current best sales yield achieved on a bulky goods centre is 7.0%. If one assumes the total cost outlined above at this yield, the rents for the centre would equate to a net rent of \$258/sqm, being approximately 45% over market.

Being an enclosed centre the Client is unable to lease all the floor area and therefore 85% efficiency should be applied to calculate the approximate net lettable area. On this basis the net rents would equate to \$303/sqm, or 70% above market.

Having regard to the recent leasing comparable and the economic rents the new centre would need to achieve, the development is not feasible and the retailers would not have the margins to sustain rentals at these levels, whether now or long term into the future.

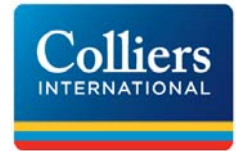
MAJOR TENANT AVAILABILITY

LFR in Sydney has well established precincts which are: Penrith, Castle Hill, Auburn, Belrose, Bankstown, Liverpool, Alexandria and Campbelltown (refer following map). If any new centre tries to establish in close proximity to these clusters they will find it difficult, and in Colliers view near impossible to secure the required anchors to kick start a new development. The LFR sector is a shallow pond when it comes to major retailers. The main precincts have evolved over many years and are unlikely to change anytime soon. The Auburn precinct is close to this site being only 2.4km away and contains all LFR majors in the market including: Harvey Norman, Domayne, Baby Bunting, Nick Scali, John Cootes, The Good Guys, Freedom, Fantastic Furniture, By Design, BCF, Supercheap, Office Works and many more, some of which own their own properties – mainly Harvey Norman.

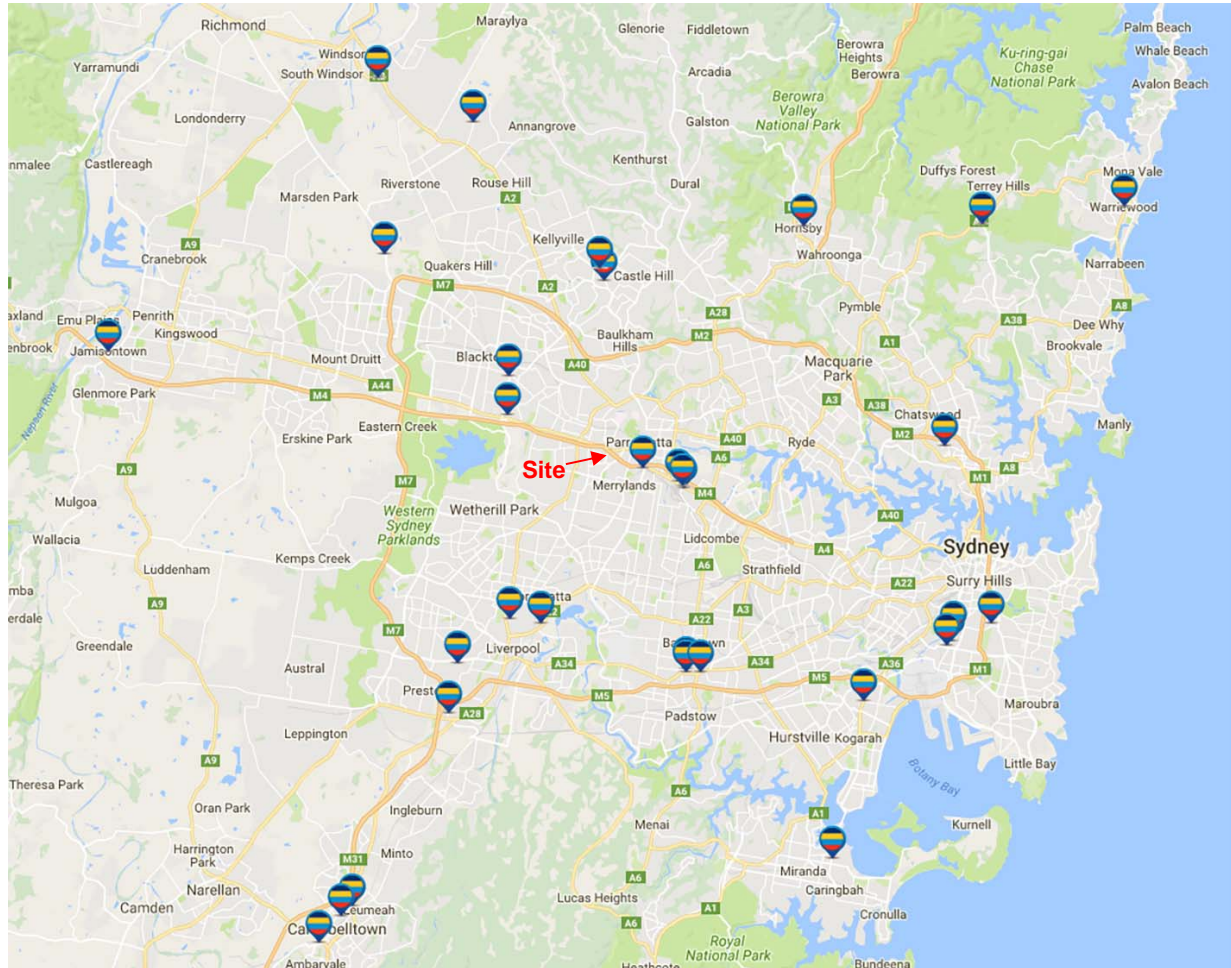
Therefore, we would find it highly unlikely that any of these would relocate away from the strength of the established precinct.

Large Format Review

1 Crescent St, Holroyd



The map below shows the location of major LFR Centres in the area.

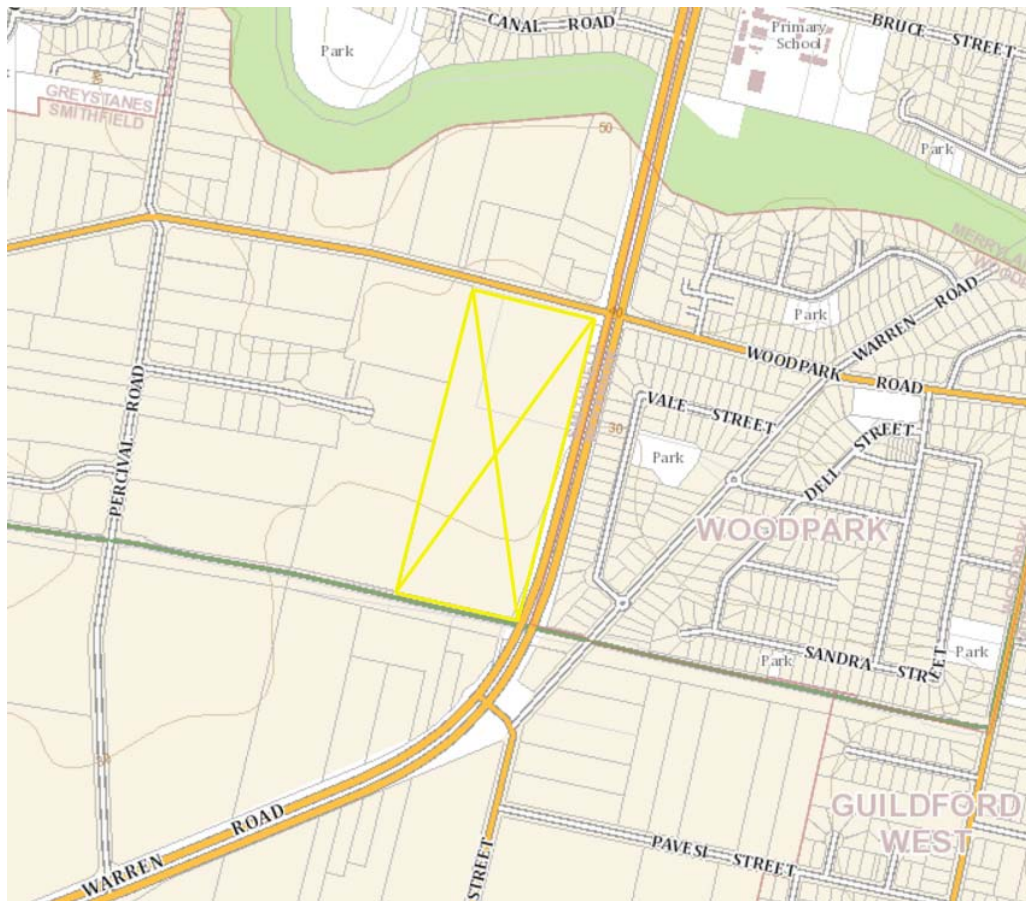
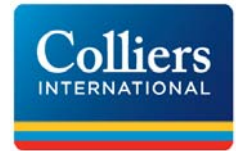


In addition to these locations there has also been a significant site of approx. 6.8 hectares that has been rezoned to B5 Business Development within the Cumberland LGA (same as the subject site) on the corner of Cumberland Highway and Woodpark Rd, Smithfield. This site has a proposed 45,000 m² homemaker centre with excellent access off both roads and has all the development attributes that will underpin a successful LFR centre.

The Smithfield site location and perspective is outlined below. Given the proximity of the Auburn precinct, and this new Smithfield centre within the same LGA as the subject site, the area is very well serviced looking into the future. This competition, which is for sites in better locations and having purpose built improvements preferred by the LFR groups, will also undermine the success of any LFR development on the subject site.

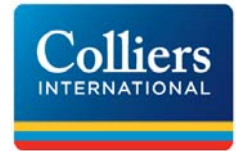
Large Format Review

1 Crescent St, Holroyd



Large Format Review

1 Crescent St, Holroyd



By way of market demand example, within less than two kilometres from the site there are properties like that illustrated below. This property is owned by Altis who are trying to back fill the 10,000 m2 property that is located at 300 Parramatta Rd, Auburn. This building was originally developed for Coles Megamart and is now at the end of their 10 year lease, however has been vacant for some 6 to 8 years and sits in the prime Auburn LFR precinct.



OTHER POSSIBLE B5 ZONE USES

The only other large industry groups who could occupy under the B5 zone would be car dealerships. As you would be aware the majority of brands are located on Auto Alley and we cannot see any dealer locating on the site as they would be at a significant disadvantage to the other dealers, who like LFR tenants, want to cluster together to benefit from each other. The accessibility for a car dealer is also less than desirable.

Industrial uses also have similar requirements for truck movements and can sustain rents significantly less than LFR, meaning the sites viability and feasibility is out of reach for these types of uses.

Large Format Review

1 Crescent St, Holroyd



SUMMARY

The conclusion of this review is the site and its constraints deem it unsuitable to attract LFR and related B5 industry, and the preliminary development feasibility demonstrates the rentals are not economical to support a successful and market resilient centre, whether immediately in the long term. Colliers feel that the UrbanGrowth's recommendations should be re-considered having regard to the market reality of this type of use.

Should you wish to meet up to discuss this in more detail we would be happy to assist.

Kind regards

A handwritten signature in blue ink, appearing to read "Tony Draper", enclosed within a blue oval shape.

Tony Draper

National Director

Large Format Retail

Mob: 0410 323 020

Email: tony.draper@colliers.com



ATTACHMENT E

19 October 2016

Tiberius (Holroyd) Pty Ltd
c/- Kurt Robinson
Direct property and Development Projects
Australian Central Equity

By email: kurt.robinson@acequity.com.au
Cc: modonnell@modurban.com.au

Dear Kurt

Response to HillPDA review of Crescent Street Holroyd Retail Impact Assessment

This letter provides a response to matters raised in the correspondence to Cumberland Council from HillPDA dated 5 July 2016.

Background

The HillPDA letter includes an examination of Deep End Services' *Retail Impact Assessment* ('DES RIA') to accompany the Planning Proposal for a mixed-use development of the property at 1 Crescent Street, Holroyd.

The DES RIA was finalised on 29 May 2015.

I note that HillPDA previously prepared a peer review of the RIA for Holroyd City Council (dated 28 September 2015) which made the following conclusions with respect to the retail impacts arising from the proposal:

- *The proposed development is likely to have an insignificant effect on all existing centres*
- *All centres will enjoy growth in sales as a result of population growth in the locality*
- *The proposal is generally in line with metropolitan and local policies and will contribute to meeting housing targets.*

HillPDA subsequently authored an economic impact assessment to support a proposed supermarket-based development at 246-264 Woodville Road, Merrylands. The Woodville Rd EIA (15 October 2015) concluded that population growth supported the proposal, there was a need for additional supermarket floorspace provision, trading impacts would not be significant, and the proposal would generate a positive economic effect for the local community.

HillPDA findings

The most recent peer review by HillPDA is more critical of the DES RIA, with their findings summarised as follows:

- The defined catchment is drawn incorrectly, does not account for barriers to movement and extends up to nearby centres
- Population forecasts are reasonable
- Retail spending is under-estimated
- Existing floorspace include some inaccuracies
- Proposed supermarket developments are not included
- Retail floorspace demand analysis doesn't account for overlapping catchments or proposed new centres
- Analysis of need for supermarket misleading as it doesn't account for demand being satisfied by nearby centres/stores
- The method and findings of the impact analysis are not supported because proposed developments are not included.

I find it somewhat disconcerting to discover that HillPDA appear to have changed their advice to Council between September 2015 and July 2016, during which time they have prepared an EIA for a similar supermarket-based project 2km to the south of the subject site.

Responses

My responses to the HillPDA peer review (July 2016) are set out in the following paragraphs.

Catchment definition

The definition of the catchment reflects the observed travel patterns to supermarkets shown by actual data for major supermarket operators. Our company undertakes store assessments for all Aldi supermarkets and we have access to private survey data for these stores. Four of my colleagues worked with the Coles research team and have detailed knowledge of the trade area patterns of Coles stores.

The adopted PTA boundary is drawn to be equidistant between the subject site and the next nearest major supermarket. That is, it describes an area within which the subject site would generally be the nearest store. This is an appropriate method to define a primary catchment.

The secondary catchments extend further but are less than 2km by direct distance – typically secondary catchments for a full-line store extend 2-3km from the store. The more constrained secondary sectors in this case reflect the influence of surrounding centres and barriers to movement.

There is nothing unusual with secondary catchments extending close to other nearby supermarkets. In fact, secondary catchments often extend *across* other stores. This reflects the different choices we make as consumers, choosing a supermarket based on our brand preferences, store preferences (especially due to different car parking arrangements) and the particular travel route at the time (eg to/from work, to/from school etc).

Also relevant is the added travel time when shopping at Westfield Parramatta and Stockland Merrylands due to the need to navigate multi-level car parks.

Attached to this letter is the EIA prepared by HillPDA in support of the proposed supermarket development at 246-264 Woodville Road (Cootes site). On p25 (Figure 3) the catchment for this proposed supermarket is drawn, extending more than 4km to the west and 3km to the east. According to Google Maps, the travel time would be 8 minutes from Wood Park at the western edge of this catchment, and 7 minutes for people at the south-eastern edge in South Granville.

Population forecasts

HillPDA consider the population projections in the RIA to be reasonable. In fact, more recent information on residential development trends (including anticipated growth within the Parramatta Road Urban Transformation corridor) indicates that the rate of population growth in the surrounding area may be more rapid than was forecast at the time the RIA was prepared.

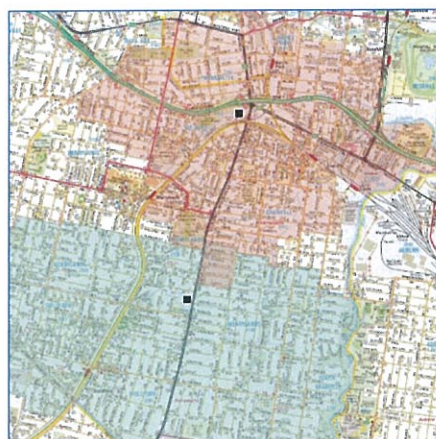
Retail floorspace – existing and proposed projects

DES has recently completed Sydney-wide estimates of retail floorspace on behalf of the NSW Department of Planning & Environment. This data confirms that total floorspace at Granville – including north and south of the railway line – is approximately 20,000sqm (including around 7,000sqm associated with large format retail and showroom uses). Total floorspace at Guildford is approximately 9,400sqm.

The larger floorspace allocations at these centres would have the effect of reducing the calculated impacts generated by the proposed development.

The proposed development at 246-264 Woodville Road (Cootes site) was not considered as it has not been lodged at the time the RIA was prepared. However, as indicated by the HillPDA RIA for this proposal, the Woodville Rd supermarket would serve a different catchment with little overlap (refer figure to the right).

HillPDA state that an application has been made for a supermarket to be developed in Granville town centre at Cowper Street/East Street. I have obtained the application details for this project, which is proposed to include a small supermarket of just 1,523sqm, not a full-line store of 3,200sqm as stated by HillPDA.



Assessment of retail need and supermarket provision

The assessment of retail need contained in the DES RIA is appropriate and follows a similar methodology to that applied in the HillPDA EIA supporting the Cootes site supermarket proposal.

The critique by HillPDA is as follows:

“The RIA provides justification for the proposed development by applying a very simplistic approach. That is, proportioning the proposed subject sites floorspace to the growth in retail floorspace demand by residents within the main trade area”.

Yet this is what HillPDA have undertaken themselves in the analysis of retail need contained in their Woodville Rd EIA (refer pp28-30), albeit by applying their own assumptions about the share of demand that should be retained within the main trade area.

In relation to the need for a supermarket, HillPDA state that the analysis is misleading because of the following:

- It considers a “broad ‘trade area’ with a population of around 37,000 people in 2014 and uses this to draw conclusions about the demand for supermarket floorspace”
- The analysis fails to account for significant supermarket provision at centres in the area such as Westfield Parramatta, Merrylands and Arida Granville
- Two proposed full-line supermarkets have not been considered.

HillPDA appear not to have properly read the DES RIA. In fact, the supermarket need analysis was conducted for a wider ‘study region’ incorporating the City of Parramatta and the City of Holroyd, with a total population of more than 300,000 people in 2014. This approach was adopted to properly account for supermarkets at major centres such as Westfield Parramatta, Stockland Merrylands, which serve wider catchments.

Further, the RIA analysis assumed that additional supermarkets would be developed over time in addition to that at the subject site, including two by 2021, and another two by 2031. The inclusion of an additional full-line supermarket on Woodville Road would have little effect on this analysis of regional supermarket need.

I note that HillPDA are incorrect in stating that a full-line supermarket will be developed on the Cowper Street/East Street site in Granville.

I also note that Macroplan Dimasi prepared an economic assessment supporting the proposed Granville supermarket in August 2016. The assessment adopted a relatively small trade area for this supermarket confined to the east of Woodville Road, with the primary sector located north of the railway line and a secondary sector extending southwards only as far as William Street.

In summary, the opportunity to develop a full-line supermarket on Crescent Street serving the defined catchment will not be inhibited by the proposed supermarket at the Cootes site which HillPDA have stated would serve a separate catchment to the south. Nor would it be affected by a proposal for a mid-sized supermarket at Granville which would have a lower-order role for a more limited catchment.

Centre trading effects

HillPDA make the finding that “*we don’t concur with the methodology and findings*”, even though this is in direct contrast to their advice of September 2015 in which they agreed that the impacts would be insignificant.

It appears that their finding is largely because the RIA did not consider the proposed developments on Woodville Road (Cootes site) and Cowper Street/East Street Granville.

The inclusion of these developments would have the effect of reducing individual impacts because the redirected sales would be distributed among a larger group of competing centres.

Also relevant is that the Granville proposal is not for a full-line store but a more limited-range supermarket of 1,523sqm, and the HillPDA EIA for the proposal on the Cootes site identifies a non-overlapping catchment to the south, thereby minimising the competitive impacts.

Sequential test

DES were not responsible for preparing a sequential test analysis of the proposed development.

However, a sequential test analysis could be conducted using the same approach adopted by HillPDA in their EIA for the proposal at the Cootes site (refer analysis on pp36-37 of that report).

- Is there a need or demand in a defined area that is not being met adequately or efficiently?
- If yes, then is there space available in an existing centre that can accommodate supply desirably and feasibly?
- If not, then is there a site or sites on the edge of a centre that can accommodate supply desirably and feasibly?
- If not, then a new centre should be considered and planned for.

The RIA shows that the defined catchment is forecast to experience significant population and spending growth, generating future additional grocery shopping demand. There are currently no large format supermarkets and population growth of +15,220 persons between 2014 and 2026 justifies the need for a new full-line supermarket.

Larger sites of more than 1ha are required to accommodate a full-line supermarket. Merrylands and Parramatta are already represented by major supermarket brands. In Granville land south of the railway line is in fragmented ownership and it is difficult to identify a property of the required size. North of the railway line properties are being consolidated for mixed use development, but the depth of the land makes it difficult in design terms to accommodate a full-line supermarket – hence the current proposal for a mid-sized store. There is insufficient land to accommodate a new supermarket adjacent to Woolworths at Arida centre.

The subject site is therefore the best opportunity to accommodate a full-line supermarket serving the identified catchment.

Conclusion

My responses to the HillPDA peer review can be summarised as follows:

1. HillPDA have changed their findings since their peer review of September 2015 when they agreed that the impacts arising from the proposal would be insignificant. In the meantime, the same company has prepared an EIA supporting a supermarket-based development on Woodville Road to the south.
2. The catchment served by the proposal at 1 Crescent Street is appropriate given the accessibility constraints and location of other supermarkets in the region. The definition of the catchment is supported by proper understanding of the geographic catchments served by full-line supermarkets.
3. Anticipated population growth is likely to be more rapid than predicted in the RIA because of projects associated with the Paramatta Road Urban Transformation Program.
4. Some estimates of centre floorspace in the RIA were under-reported, but the effect of greater floorspace is to reduce the percentage trading impacts.
5. HillPDA state that a full-line supermarket would be developed in Granville (Cowper Street/East Street) but this is incorrect as the plans for this project include a limited sized store of 1,523sqm.
6. Analysis of retail need was conducted properly and in a similar manner to the analysis contained in the HillPDA EIA for the Cootes site development.
7. HillPDA appear to have misconstrued the analysis of supermarket need, which included anticipated developments at the time. The inclusion of another supermarket at the Cootes site would have little effect on this analysis, and I note that the HillPDA EIA for that project identifies a non-overlapping catchment.
8. A sequential test conducted as per the HillPDA methodology used in their EIA for the Cootes site would conclude that the subject site is the best and only opportunity to establish a new supermarket serving a region that does not currently have any full-line supermarket provision.

I trust that this letter addresses your needs, but please contact me if further comment is required.

Kind regards

A handwritten signature in dark ink, appearing to read 'M. Lee', with a stylized, flowing script.

Matthew Lee
Principal