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Planning Proposal – Amendments to Auburn Local Environmental Plan Environmental Plan 2010

**1-13 GREY STREET AND 32-46 SILVERWATER ROAD,
SILVERWATER**

Date: June 2013

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Introduction

1. Introduction

1.1. Purpose of this Report

The Planning Proposal is submitted to Auburn City Council (Council) in support of an amendment to Auburn Local Environmental Plan 2010 (Auburn LEP 2010) to rezone a 6,277m² parcel of land at 32-48 Silverwater Road, Silverwater (hereafter referred to as the site) from B6 Enterprise Corridor to B4 Mixed Use. It is also proposed to amend the development standards that presently apply to the site in relation to height of buildings and floor space ratio to standards commensurate with the proposed mixed use zone.

The site is generally bound by Silverwater Road to the east, Bligh Street to the south, Grey Street to the west and Carnarvon Street north. It is approximately 2 km north-east of Auburn Central Business District, 260 m to the north of the intersection of the M4 Motorway and Silverwater Road and 1.9 km to the north-east of Auburn Railway Station. Sydney Olympic Park is located approximately 1.6 km to the east. Existing surrounding development is historically residential with industrial, warehouse and commercial uses to north and east. Under Auburn LEP 2010, surrounding land is now zoned B6 Enterprise Corridor, R3 Medium Density and R4 High Density. Redevelopment of B6 zoned land is expected to include business premises, light industries and warehouse or distribution centres. The realisation of Council's vision for the area, under the current land use zonings, of this locality significantly as single storey detached dwellings are replaced with 'enterprise corridor' uses.

This report has been prepared by APP Corporation Pty Ltd on behalf of Hilfer Property Pty Ltd and is based on plans and information provided by Mosca Pserras Architects and other supporting technical documents. It has been prepared in accordance with the Department of Planning and Infrastructure's '*A guide to preparing planning proposals*' (October 2012) and includes the following:

- a statement of the objectives;
- an explanation of the provisions proposed;
- the justification for those objectives, outcomes and provisions and the process for their implementation;
- a zoning map which reflects the proposed land use zones; and
- acknowledges the community consultation that will be undertaken.

The redevelopment opportunities on site facilitated by this planning proposal will revitalise the immediate area, particularly the western side of Silverwater Road which generally remains undeveloped notwithstanding its current B6 enterprise corridor zoning. This area also lacks services and facilities to meet the daily needs of existing residents in the area, additional incoming residents as a result of density increases under the existing LEP and existing and future workers in the Silverwater Industrial Area and within the main area of B6 Enterprise Corridor zoned land on the opposite side of the M4 Motorway.

This Planning Proposal demonstrates that residential development in the form of residential flat buildings with a modest component of ground floor retail / commercial floor space can be developed on the site. The range of land uses permissible within the B4 Mixed Use zone have the ability to service and sustain the surrounding residential, business corridor and industrial land uses by providing residential accommodation for people close to places of work and a modest amount of retail / commercial to provide for the needs of existing and future residents and workers. The site redeveloped would also deliver public benefits in the form of a publicly accessible through-site link with the potential for active uses fronting onto it. This has the potential to become an important meeting place /

hub for residents, visitors and workers and the like. Surrounding land as shown on Figure 2 is fragmented and in multiple ownerships. This planning proposal consolidates 14 lots within the broader precinct into a single parcel of land and facilitates the orderly and economic development of land. Opportunity exists concurrent with the consideration of this Planning Proposal for the Council to review relevant planning controls for the broader precinct.

1.2. Structure of this Report

The Planning Proposal is structured as follows:

- Section 2 provides a detailed description of the site and surrounds;
- Section 3 presents the Planning Proposal;
- Section 4 provides an assessment of the needs and justification;
- Section 5 provides a detailed planning and environmental assessment of the proposal; and
- Section 6 is a conclusion.

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Site Analysis

2. Site Analysis

2.1. Existing and Future Context

The site is located on the western of Silverwater Road, approximately 260 m to the north of the major cross-road / gateway intersection of M4 Motorway and Silverwater Road. It is approximately 2 km north-east of Auburn Central Business District and approximately 1.9 km north-east of Auburn Railway Station (refer to **Figure 1**). An aerial photograph of the site and its surrounding context is shown in **Figure 2**.

Silverwater, traditionally an established residential suburb, now contains large areas of land occupied by industrial / warehouse uses, particularly to the north of Carnarvon Street. The area immediately adjoining the site is presently characterised by one-two storey older style detached dwellings on single allotments of land. The area has a relatively low level of permeability and public domain.

The surrounding area contains a number of stand-alone taller buildings. These include:

- 7 storey commercial building, approximately 530 m south of the site on the north-eastern corner of Silverwater Road and Parramatta Road;
- 4-5 storey residential flat buildings within Newington Town Centre (approximately 650m to the east of the site); and
- 4-30 storey buildings within Sydney Olympic Park (approximately 1.5 km to the east of the site) including the Novotel Hotel Tower at 15 storeys and 'One Australia Avenue' at 30 storeys).

Silverwater comprises an eclectic mix of residential properties of varying height, age, construction and design. There is not a consistent theme or character of the local area. It is not uncommon to come across a cluster of taller buildings or a single residential flat building surrounded by single storey detached dwellings.

Silverwater Road Industrial Area, located to the north of the site, on the opposite side of Carnarvon Street, is characterised by warehouses and distribution centres and light and heavy industrial developments. There is also a limited amount of commercial / industrial development to the east of the site, on the opposite side of Silverwater Road.

The immediate area is now zoned to allow redevelopment for a mix of commercial, industrial and higher density residential development. The site itself is located within a pocket of B6 Enterprise Corridor zoned land which is bound by Carnarvon Street to the north, residential properties on Barker Street to the east, the M4 Motorway to the south and existing open space (Hume Park and Deakin Park) to the west. The B6 Enterprise Corridor zone area is isolated from Auburn's main area of B6 zoned land which is located to the south of the M4 Motorway and fronting onto Parramatta Road (refer to **Figure 2**).

The future character the site and surrounding area, under the current B6 Enterprise Corridor zoning under Auburn LEP 2010 will comprise a mix of commercial and modern industrial development with heights of up to 14 m (equivalent 4-5 residential storeys) with limited opportunities for any retailing and multiple dwellings and residential flat buildings of between 3 and 5 storeys on residential zoned land. Within the B6 zoned land to the south of the M4 Motorway and within the 'Parramatta Road Precinct', Auburn LEP 2010 permits office, hotel and motel

developments of up to 27 m in height (equivalent 9 residential storeys). The 'Parramatta Road Precinct' is 60 m to the south of the site.

Development consent has been granted for redevelopment of surrounding sites for medium and high rise buildings including residential, short-term accommodation and commercial/retail uses. Approval was granted for 3-4 storey mixed use development comprising 118 units and 23 commercial/retail units at 79-83 Beaconsfield Road, which is approximately 465 m east of the site. An approved 9 storey mixed used development comprising a hotel with ground floor commercial units is located at 188-194 Parramatta Road, which is approximately 740 m south-west of the site. Approximately 425 m south of the site and on the eastern side of Silverwater Road is an approved 6 storey commercial building.

Notwithstanding the above, there has been no large scale redevelopment at Silverwater or within the B6 Enterprise Corridor zone along Silverwater Road at this time.

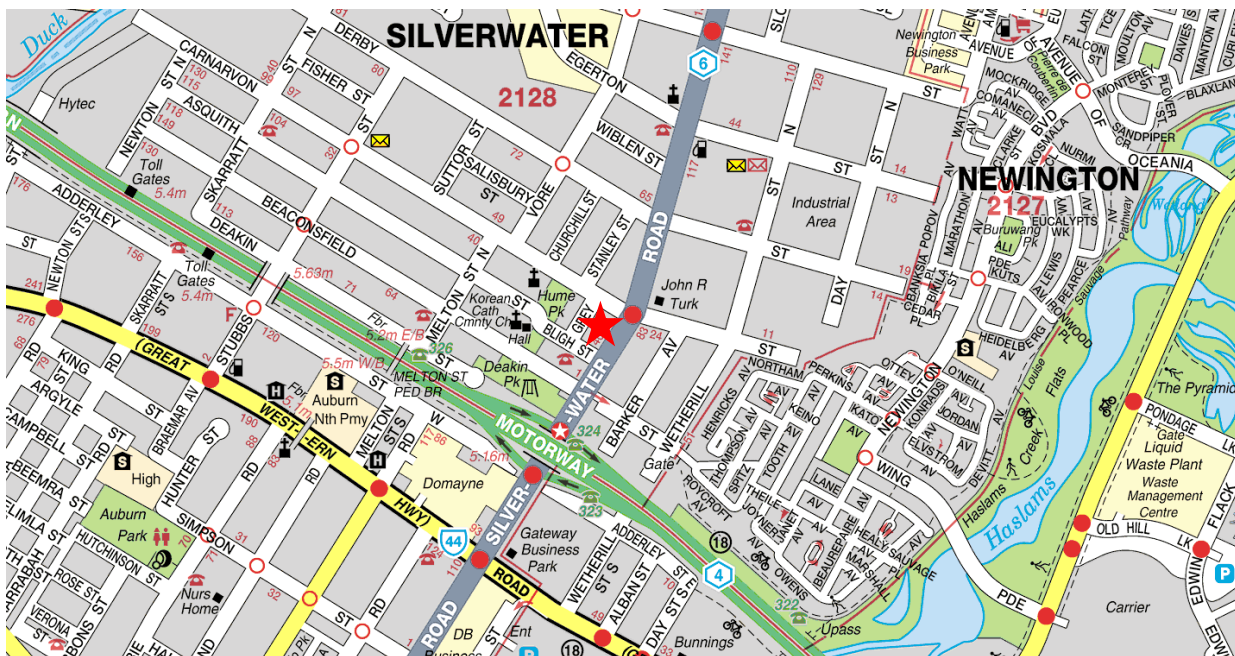


Figure 1 – Locality Map (site indicated with red star)



Figure 2 – Aerial photograph

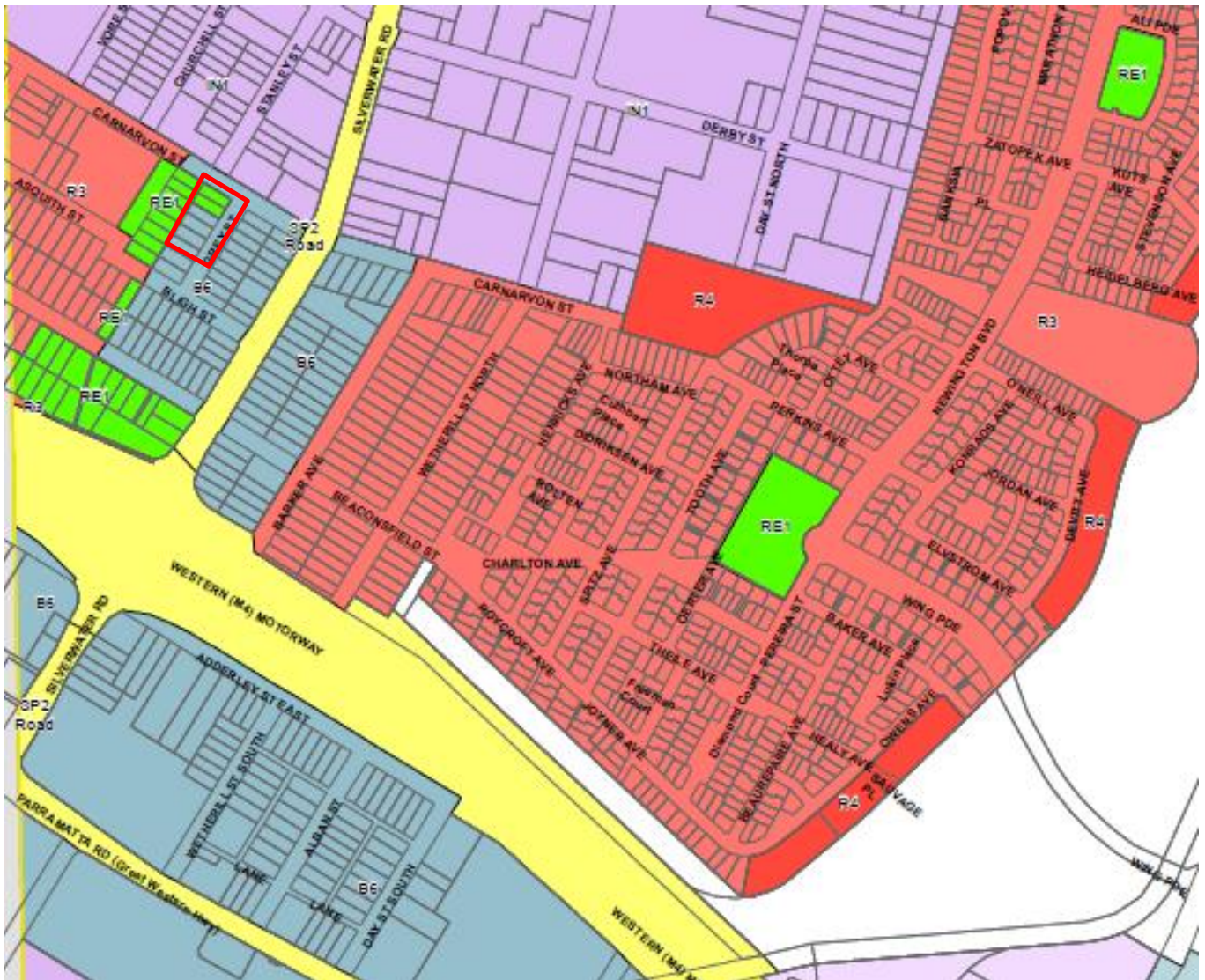


Figure 3 – Extract of Existing Zoning Map (Auburn LEP 2010)

2.2. Site Description

The site comprises 14 lots and is legally described as:

- Lot 18 in DP 77341;
- Lots 8, 14, 15, 16 and 17, Section 5 in DP 979426;
- Lot 13 Section 5 in DP 75209;
- Lot 12 in DP 76894;
- Lots 5, 6 and 7 in DP 89550;
- Lot 1 in DP 90071; and
- Lots 1 and 2 in DP 1110059.

It is rectangular in shape and has an approximate area of 6,277 m² with a 107 m frontage to Silverwater Road, a 67 m frontage to Carnarvon Street, a 70 m frontage to Bligh Street and a 106 m frontage to Grey Street (refer to **Figure 4**). The site is currently owned by Hilfor Property Pty Ltd.



Figure 4 – Site Plan

2.3. Existing development

The site comprises 12 single storey detached dwelling houses (now vacant), a commercial building located on the corner of Bligh Street and Silverwater Road which was previously used as a dry cleaning establishment (refer to Figures 5 and 6).



Figure 5 – Existing Development on the site



Figure 6 – View of existing development on the site – vacant dry cleaner premises on corner of Silverwater Road and Bligh Street (top left), dwelling houses fronting Silverwater Road (top right) and dwelling houses fronting Grey Street (bottom left)

2.4. Landform and Topography

The topography of the area is characterised by a gently sloping to flat terrain.

2.5. Vegetation

The site is generally devoid of any significant vegetation. Street trees and grass ground covers are within the road reserve.

2.6. Vehicular Access and Transport

Silverwater Road is a principal arterial road forming a key north-south route in north western Sydney. It is a six lane divided carriageway with three traffic lanes in each direction with a 70 kilometre per hour speed limit. Silverwater Road includes clearways operating in both directions during weekday peak periods. Silverwater Road carries some 3,200 to 4,500 vehicles per hour in each direction during weekday peak periods.

Carnarvon Street (north of the site) intersects Silverwater Road at a signalised intersection which permits both left and right turns into Silverwater Road. Carnarvon Street provides one traffic lane and another lane devoted to on-street parking in each direction. Carnarvon Street carries some 500 to 600 vehicles per hour in each direction during weekday peak periods.

Bligh Street (south of the site) connects to Silverwater Road at a non-signalised t-intersection, which only permits left in and left out turns into Silverwater Road. Bligh Street provides one traffic lane and another lane devoted to on-street parking in each direction.

Grey Street (west of the site) connects Carnarvon Street with Bligh Street. The intersections are non-signalised and permits all turns. Grey Street provides one traffic lane and another lane devoted to on-street parking in each direction. It also has a three tonne load limit.

Bus stops are located on either side of Carnarvon Street approximately 84 m west of the site. Route 544, operated by Sydney Buses, provides an hourly service with more frequent services operating during weekday peak periods. This route connects the site to Auburn Railway Station and Macquarie Centre. The site is approximately 80 m west of a north-south cycle route connecting Auburn and Sydney Olympic Park.

2.7. Open Space and the Public Domain

The site has excellent access to both active and passive areas of open space. The main areas of landscaped open space and public domain in close proximity to the site include:

- Hume Park – approximately 60 m to the west of the site;
- Deakin Park - approximately 130 m to the south-west of the site; and
- a linear park connecting Hume Park and Deakin Park.

In addition, there are a number of existing open space areas within Auburn and Sydney Olympic Park in the vicinity.

2.8. Surrounding Development

The land surrounding the site forms part of the B6 Enterprise Corridor. There are no properties in the immediate vicinity of the site that have been developed in accordance with the zone objectives for this part of Silverwater and the majority of sites contain detached dwellings on single allotments of land. The realisation of the types of uses identified in the B6 zone objectives in the future will change the character of this locality significantly.

2.8.1. To the North

Immediately north of the site and on the opposite side of Carnarvon Street is a two-storey commercial office and warehouse complex, which is occupied by 'EMG Express Media Group' (refer to **Figure 5**). Further north of the site and along Silverwater Road are warehouse, distribution centre and commercial office developments. These areas are zoned IN1 – General Industrial and are envisaged to maintain low-intensity industrial development, such as warehouse and distribution centre that incorporate commercial office development.

2.8.2. To the South

Immediately south of the site and on the opposite side of Bligh Street are single-storey detached dwelling houses (refer to **Figure 7**). Further south of the site is Deakin Park (110 m), Parramatta Road (560 m) and the Auburn Urban Centre (1.4 km). Areas to the south are zoned B6 Enterprise Corridor and RE1 Public Recreation. The adjoining block to the south of the site, comprised of single residential allotments, is expected under the B6 Enterprise Corridor to be consolidated and redeveloped into medium and high rise commercial/ retail roadside development that could be used for bulky goods retailing and/or hotel and motel accommodation.



Figure 7 – view of commercial office and warehouse development on the corner of Carnarvon Street and Silverwater Road (to the north of the site) (left) and dwelling houses on the opposite side of Bligh Street to the south of the site (right)

2.8.3. To the East

Immediately east of the site and on the opposite side of Silverwater Road are two and three storey commercial showroom and warehouse developments (refer to **Figure 8**) and single and double storey detached dwelling houses. Further east of the site is Newington Village, the former Olympic Village (320 m) and Sydney Olympic Park (1.5 km). Newington Village is comprised of a balance of low and medium density residential development in the form of detached and attached two storey dwellings and residential flat buildings. It features a commercial centre that is immediately surrounded by four and five storey residential flat buildings.

2.8.4. To the West

Immediately west of the site and on the opposite side of Grey Street are single-storey detached dwellings and a single-storey shop and warehouse, which is occupied by a meat products wholesaler (refer to **Figure 6**). This area is zoned R3 Medium Density Residential. The aim of the R3 zone is to encourage consolidation and redevelopment of individual residential allotments that are currently comprised of single detached dwelling houses to enable redevelopment to accommodate three and four storey residential flat buildings.



Figure 8 – Showrooms and warehouses on the opposite side of Silverwater Road to the east of the site (left) and Surrounding development on the opposite side of Grey Street to the west of the site (looking north-west (right))

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Concept Planning

3. Concept Planning

A concept plan for the site has been developed by Mosca Pserras Architects to demonstrate the capability of the site to accommodate infill development (refer to concept drawings included at **Appendix A** and **Figure 9**).

3.1. Land use

The concept plan provides for a mixed use residential development with a maximum GFA of 23,539 m² comprising:

- 19,539 m² of residential floor space; and
- 4,000 m² of non-residential / retail floor space.

3.2. Site Planning and Layout

The site comprises four rectangular buildings of 10, 8, 6 and 5 storeys.

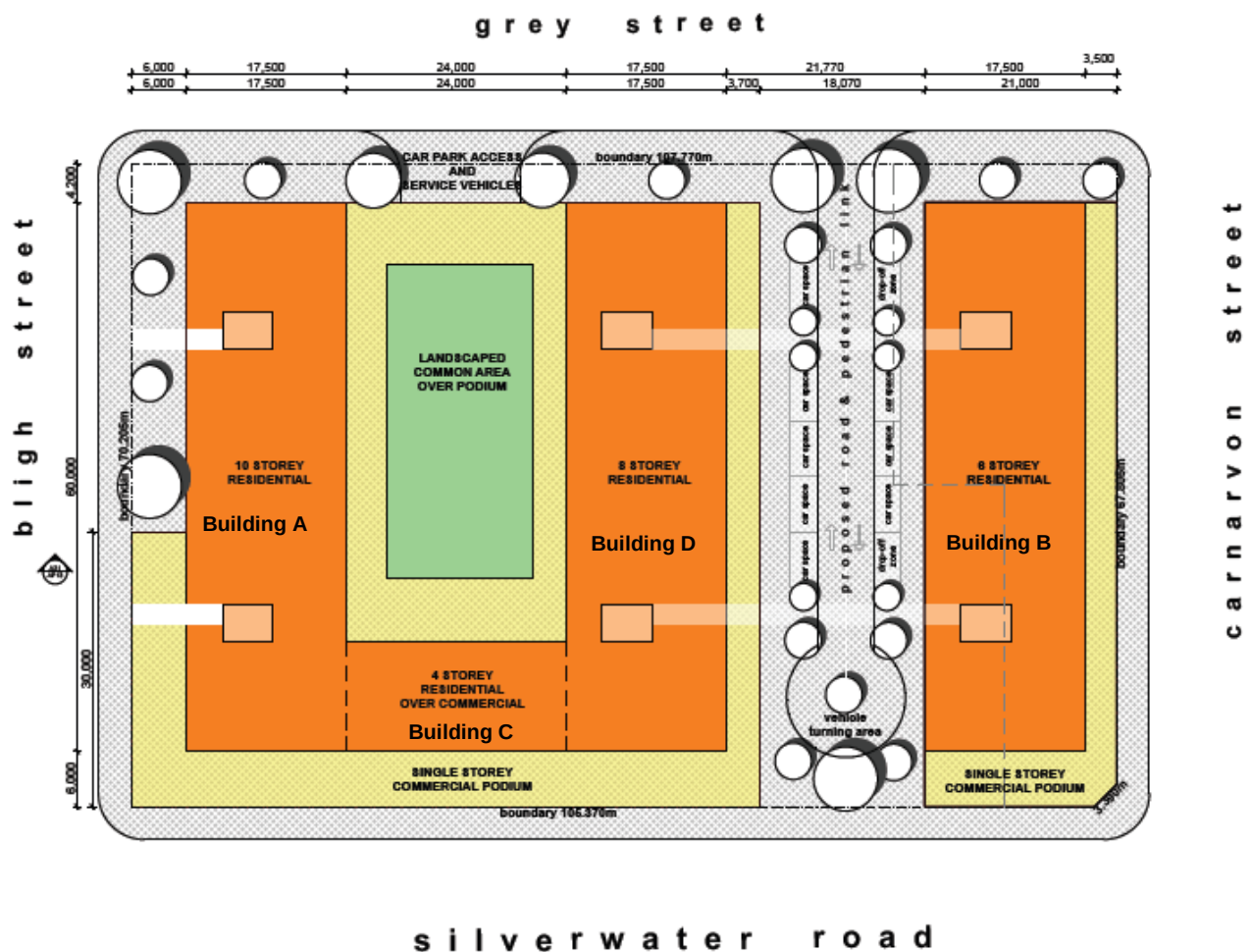


Figure 9 – Concept Plan

The long axis of two of these buildings is oriented towards, and built to the edge of Carnarvon and Bligh Streets (Buildings A and B). The third building (Building C) is situated between Carnarvon and Bligh Streets, and has its long axis running in east-west direction with frontages to both Grey Street and Silverwater Road. Building D sits

between Building A and C and is 5 storeys and is built to Silverwater Road. Buildings A, C and D are connected by a single storey commercial podium, which is built to part of the site's Bligh Street and Silverwater Road frontages. Building A also sits above a single storey commercial / retail podium. Buildings A, C and D are separated from Building B by shared through-site link.

The residential towers above the single storey commercial podium are setback between 3.5 m and 6 m from the site's property boundaries. Buildings A and C are separated by a distance of 24 m to accommodate an area of communal open space over the southern commercial podium. This separation distance is consistent with the building separation rules of thumb for buildings over 25 m in height as set out in the Residential Flat Design Code (SEPP 65). Buildings C and B are separated by a distance of approximately 21.8 m. Within this separation distance is the road and pedestrian link.

Concept elevations for site frontages are reproduced in **Figures 10-12**.

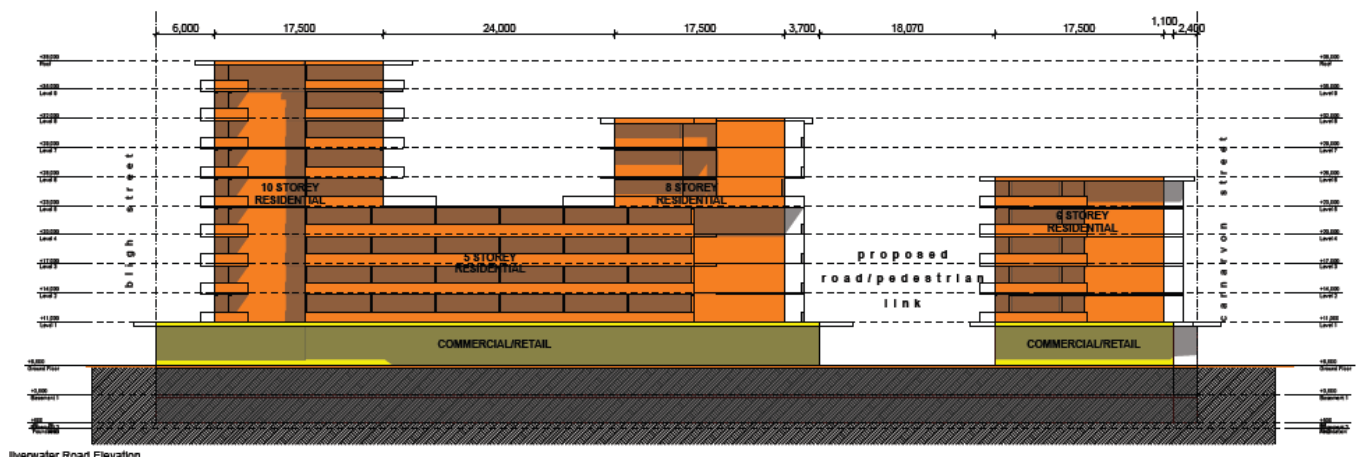


Figure 10 – Silverwater Road Concept Elevation

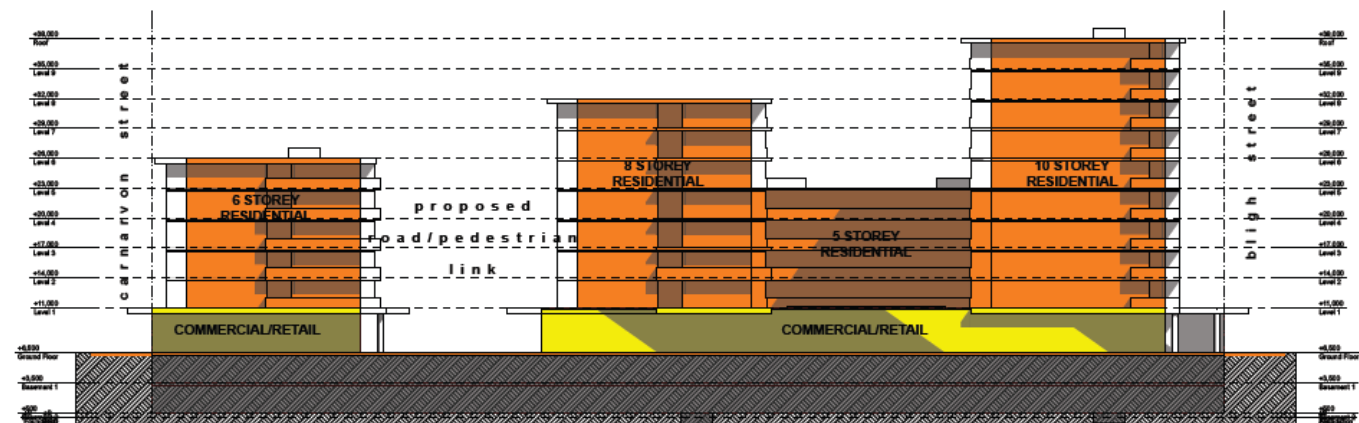


Figure 11 – Grey Street Concept Elevation

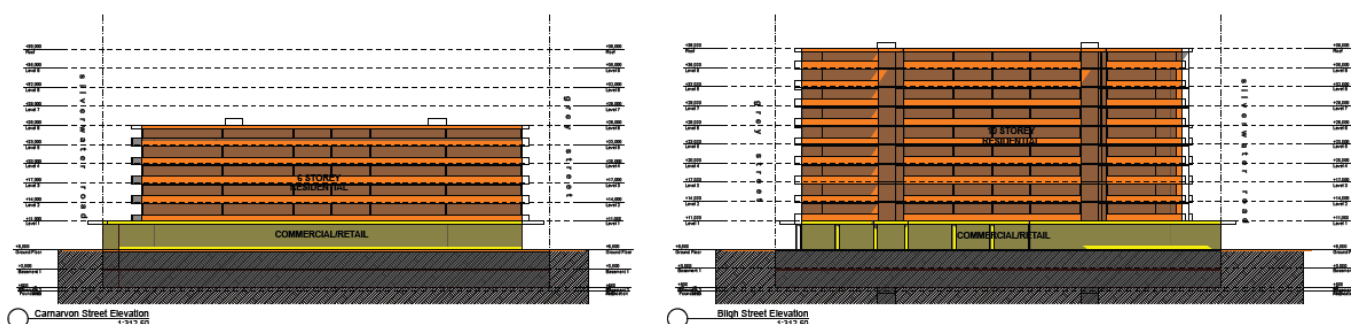


Figure 12 – Carnarvon and Bligh Street Concept Elevations

3.3. Numerical Overview

Table 2 provides a summary of the key development information relating to the concept proposal.

Table 2 – Key Development Information

Component	Proposal
Site Area	6,277 m ²
Gross Floor Area	
• Total	23,539 m ²
• Residential	19,539 m ²
• Retail / Commercial	4,000 m ²
Building Height	
• Building A	31.5 m (RL 38)
• Building B	19.5 m (RL 26)
• Building C	25.5 m (RL 32)
• Building D	19.5 m (RL 23)
Setbacks	
• Bligh Street	Nil to 6 m
• Grey Street	4.2 m
• Carnarvon Street	Nil (ground floor) to 3.5 m (above ground floor)
• Silverwater Road	Nil (ground floor) to 6 m (above ground floor)
Through-site Link	1,250 m ²

3.4. Residential Apartments

The concept proposal envisages approximately 226 apartments.

3.5. Retail /Commercial Space

The concept plan includes approximately 4,000m² of commercial / retail floor space at street level.

The concept plan envisages that smaller shops will front and address the road and pedestrian link to assist with the activation of the building frontages to this link. These shops would accommodate smaller speciality stores, cafes, food and drink premises and restaurants to meet every day needs for urban living.

3.6. Vehicular Access and Parking

Vehicular access to the shared link is provided from Grey Street. It is anticipated that it would be a 'no through road' that comprises a vehicle turning area at its terminus (i.e. eastern end) to accommodate on-street parking spaces and drop-off zones. The concept plan includes two levels of basement car parking.

3.7. Pedestrian Access

The residential foyers will be provided at street level to enable seamless pedestrian access to residential apartments from the street and other public areas. The road and pedestrian link provides direct pedestrian site-through access between Grey Street and Silverwater Road. Main entries to the commercial/retail podiums would be provided along the road and pedestrian link. Secondary entries would then be provided along the site's Silverwater Road frontage.

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Planning Proposal

4. Planning Proposal

4.1. Objectives and Intended Outcomes

The objective of the Planning Proposal is to rezone the site from B6 Enterprise Corridor to B4 Mixed Use under Auburn LEP 2010 to enable the redevelopment of the site for a mixture of compatible land uses including the erection of residential flat buildings of up to 32 m with retail and business land uses with a maximum 4,000m² GFA. The intended outcome of the Planning Proposal is to facilitate redevelopment and urban renewal of the site in a coordinated fashion and in doing so achieve the site's highest and best use. It is envisaged that the Planning Proposal will promote and facilitate primarily residential development with a minor component of compatible business or retail uses, set against an attractive public domain.

The Planning Proposal will deliver certainty and clarity of planning outcomes for the site. The proposed land use zone and development standards will:

- facilitate the urban renewal / development of the site,
- deliver employment during the construction phase of the development;
- facilitate housing choice and affordability meeting a demand for housing by residents wishing to remain in the LGA and providing housing in proximity to places of employment (i.e. Silverwater Industrial Area and commercial / industrial uses envisaged within the surrounding B6 Enterprise zoned land); and
- facilitate the establishment of a publicly accessible pedestrian link through the site.

4.2. Explanation of Provisions

4.2.1. Land to which LEP amendment will apply

A draft Land Application Map is provided at **Figure 13**. The draft Land Application Map illustrates the land that is to be included in the LEP Amendment. It is noted that the draft LEP map shows a suggested land use zone for land that is outside of the site. Although this land does not form part of the land to which this planning proposal relates, it has been included on the draft LEP mapping to assist Council in its consideration of the rezoning proposal in the context of the wider area. This application does not pre-suppose, rely upon or seek to provide an environmental assessment with respect to the implications of the future rezoning of this broader land area. It serves to demonstrate one alternative land use zoning of the nominated block.

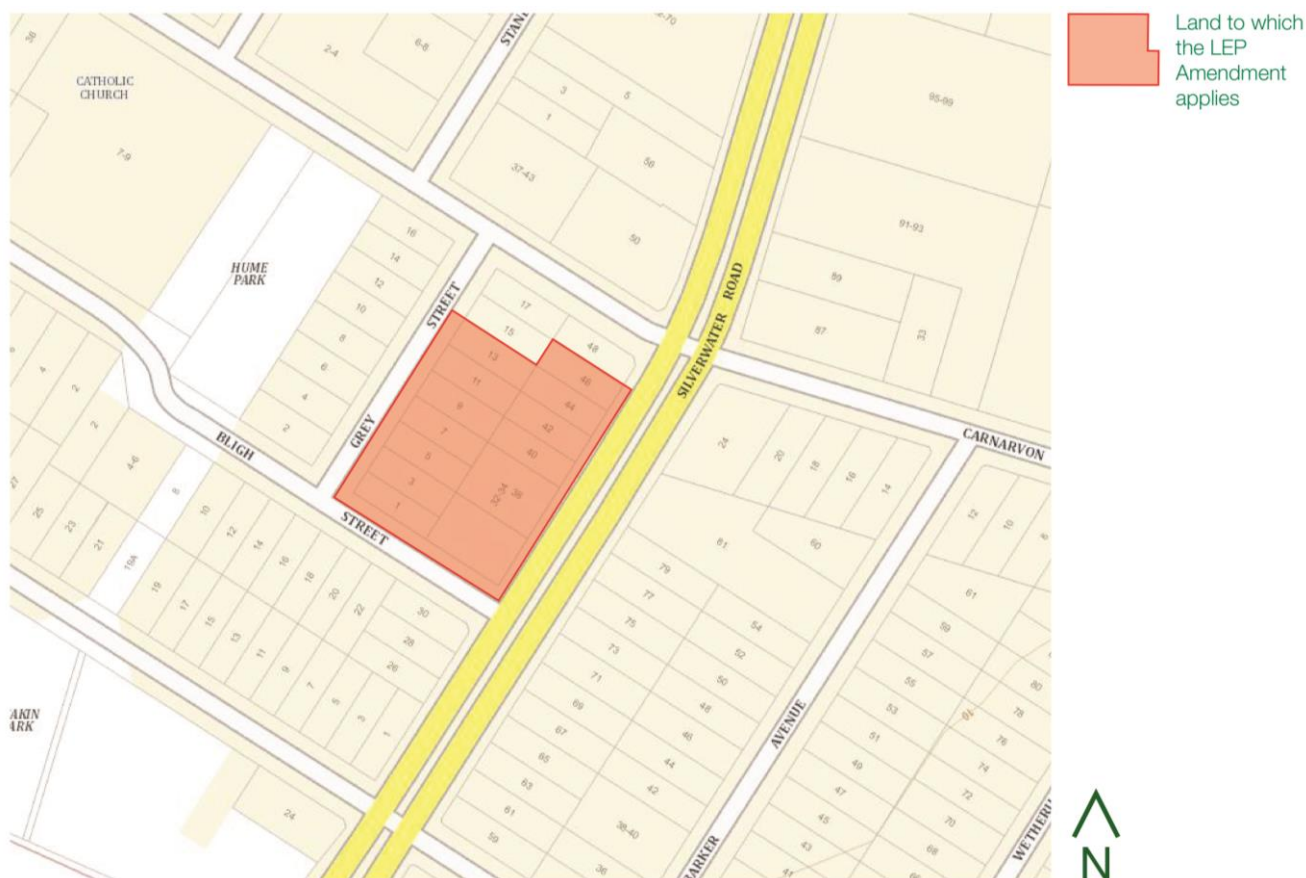


Figure 13 – Draft Land Application Map

4.2.2. Proposed Land Use zone

The B4 Mixed Use zone is considered an appropriate zone for the site. It is proposed to adopt the land use table for the B4 Mixed Use zone as currently set out in Auburn LEP 2010. It is not proposed to nominate any additional permitted uses on the site. A Draft Land Zoning Map illustrating the proposed land use zone is provided at **Figure 14**.

Auburn LEP 2010 identifies development that is prohibited and specifies that all development not otherwise specified is permissible. This approach is consistent with the Department of Planning and Infrastructure's LEP Practice Note PN 06-002, in that the need to undertake 'spot rezonings' or other ad hoc LEP amendments over time to permit additional acceptable uses that were not anticipated during the initial LEP preparation is minimised.

The zone objectives and permissible uses within the B4 Mixed Use as set out in Auburn LEP 2010 are as follows:

1 Objectives of zone

- *To provide a mixture of compatible land uses.*
- *To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.*
- *To encourage high density residential development.*

- To encourage appropriate businesses that contribute to economic growth.
- To achieve an accessible, attractive and safe public domain.

2 Permitted without consent

Nil

3 Permitted with consent

Backpackers' accommodation; Boarding houses; Business premises; Child care centres; Community facilities; Educational establishments; Entertainment facilities; Function centres; Hostels; Hotel or motel accommodation; Information and education facilities; Office premises; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Residential flat buildings; Retail premises; Roads; Self-storage units; Seniors housing; Serviced apartments; Shop top housing; Warehouse or distribution centres; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Animal boarding or training establishments; Boat building and repair facilities; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Marinas; Mooring pens; Moorings; Open cut mining; Recreation facilities (major); Research stations; Residential accommodation; Rural industries; Sewerage systems; Sex services premises; Storage premises; Tourist and visitor accommodation; Transport depots; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies

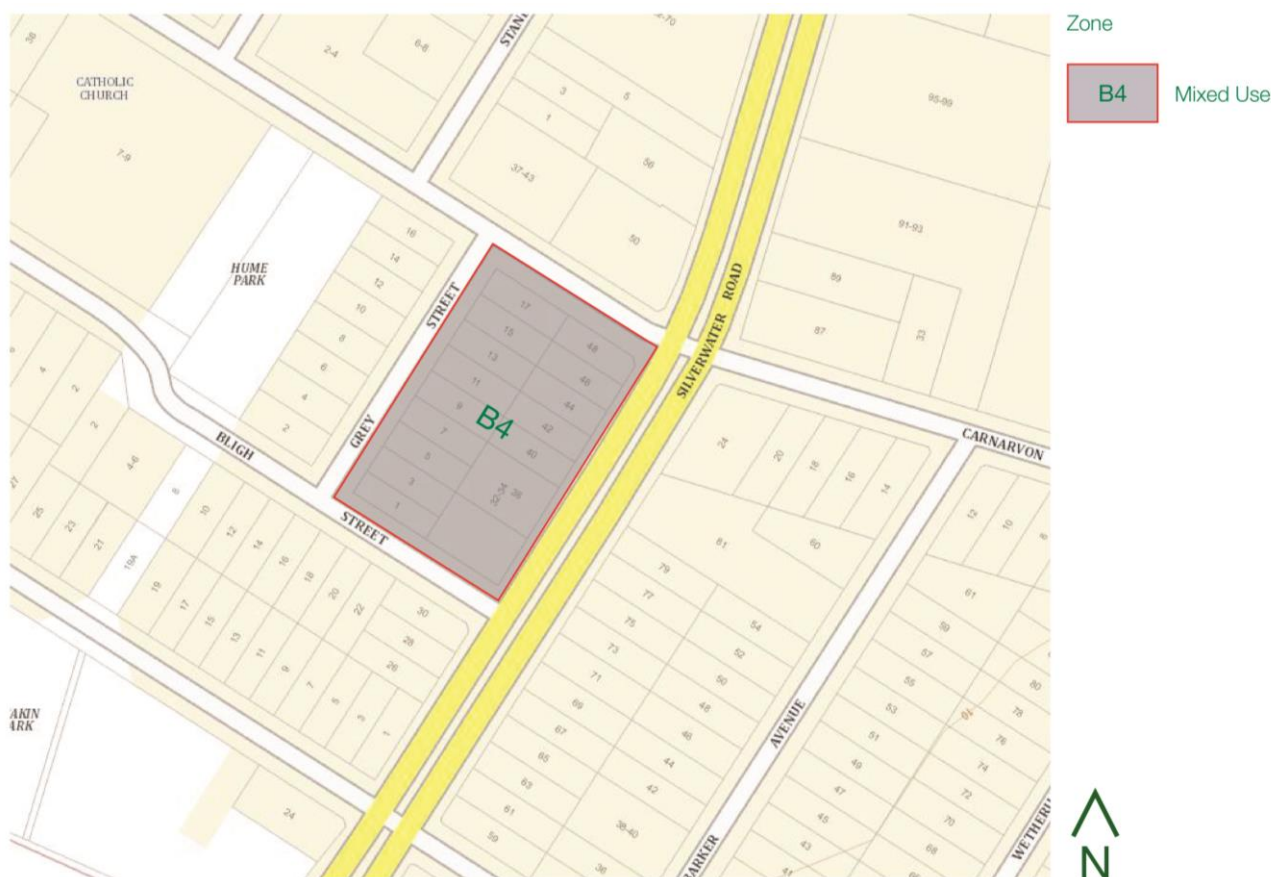


Figure 14 – Draft Zoning Map

4.2.3. Explanation of land use zone selection

It is proposed to apply the B4 Mixed Use Zone to the site rather than B2 Local Centre Zone on the basis that the B4 zone appropriately reflects the intended outcome of the planning proposal and the site to provide a range of residential development including residential flat buildings as well as non-residential / retail development.

As described in the DoP's LEP Practice Note PN 06-002 the B2 Local Centre Zone is intended for "...centres that provide a range of retail, business, entertainment and community functions that typically service a wider catchment than a neighbourhood centre."

It is not the intention or the purpose of the planning proposal that the site fulfil this function with respect to its non-residential role within the broader urban context. As described in Section 3, the Concept Plans developed for the site illustrate higher density housing in the form of four residential flat buildings (approximately 226 dwellings) with a small component of non-residential retail land use at ground level.

It is considered that the B4 Mixed Use Zone, which is described in the DoP's LEP Practice Note PN 06-002 as follows, reflects the future intended role and development of the site:

“This zone is generally intended for use where a wide range of land uses are to be encouraged, including retail, employment, residential, community and other uses.”

It is considered that the existing objectives of the B4 zone as set out in Auburn LEP 2010 reflect the intent of the site:

- to provide a mixture of compatible land uses.
- to integrate suitable business, office, residential, retail and other development in accessible location so as to maximise public transport patronage and encourage walking and cycling.
- to encourage high density residential development.
- to encourage appropriate businesses that contribute to economic growth.
- to achieve an accessible, attractive and safe public domain.

It is also considered that application of the B4 Mixed Use Zone is consistent with DoPI's Promoting Economic Growth and Competition Through the Planning System Review Report April 2010. The Review Report identifies that land use planning systems should be flexible and should ensure that land use planning policies provide for the growth of areas to be responsive as the population density in the area changes and consumer needs shift over time with changes in demographics. To have the best economic and innovative outcomes, the DoP Review Report concludes that strategic planning documents need to reflect the dynamic nature of land use and in particular, that it is important that areas can accommodate a range of mixed uses.

It is considered that the B4 Mixed Use zone as currently drafted in Auburn LEP 2010 appropriately reflects the intended outcome of the planning proposal and the site.

The B6 Enterprise Corridor zone is proposed for removal on the basis that the detailed planning for the site and economic report prepared in support of the planning proposal has identified that the quantum of commercial and industrial development is not required (refer to detailed discussion at Section 6).

4.2.4. Principal Development Standards

It is intended that the LEP Amendment will contain principal development standards for:

- Maximum height of buildings; and
- Maximum floor space ratio.

It is not proposed to retain the existing development standard for minimum subdivision lot size on the site.

Maximum Height of Buildings

The maximum height proposed for the site is 32 m. As shown in the concept plans, the maximum height of buildings varies across the site from 6 storeys (19.5 m) to Carnarvon Street, 10 storeys (31.5 m) to Bligh Street, 8 and 6 storeys (25.5 m and 19.5 m) to Grey Street and 10 (32 m), 5 (16.5 m) and 6 (19.5 m) storeys to Silverwater Road. A Draft Height of Buildings Map is included at **Figure 15**.

Currently, a maximum building height of 14 metres applies to the site. It is considered that increasing the maximum permitted height on the site is required to facilitate the establishment of a landmark development. It is intended that

the site will comprise predominantly up to 32 m within the site's Bligh Street frontage with lower buildings or set down edges to the other streets of 5-6 storeys.

The proposed increase in height on the corner of on the corner of Bligh Street and Silverwater Road (Building A) (i.e. 32 m (10 storeys)) is considered appropriate in that:

- the proposed building is located along a buffer strip and along a distinctive 'gateway' location;
- this part of the site is capable of accommodating additional height. The proposed building does not cause any material environmental impacts to future non-residential properties or the public domain in respect of overshadowing, visual impact, view loss, privacy and access to daylight and ventilation;
- the proposed building form has an appropriate height and mass relationship to Silverwater Road which is some 29 m wide;
- the height of this building is of a scale that is compatible with the desired future character of surrounding development to the south of the site (60 m), on the opposite side of the M4 Motorway which permits buildings of up to 27 m in height);
- it is a corner block location with the design accentuating the corner in accordance with sound urban design principles; and
- it will provide visual interest.

In addition, the envisaged heights of other buildings on the site (Buildings B to D):

- the proposed building forms will enhance the existing skyline;
- the proposed building forms are setback at the upper levels 4.2 - 6 m from the street edge and at street level additional height will not be perceived;
- the proposed heights enables the provision of generous floor to ceiling heights (approximately 2.7 metres for residential uses and 4 metres for ground level commercial and retail uses), which will promote high levels of internal amenity;
- the proposal will not result in any material or significant adverse environmental impacts to adjoining properties or the public domain; and
- the proposed building forms are consistent with a number of buildings approved, built or currently under construction within the broader area including Newington and Sydney Olympic Park (refer to Section 2.1).



Figure 15 – Draft Building Height Map

Maximum Floor Space Ratio

The maximum FSR proposed for the site is 3.75:1.

It is proposed that the LEP Amendment include a special provision to limit the amount of retail / commercial GFA that can be developed on the site to 4,000m².

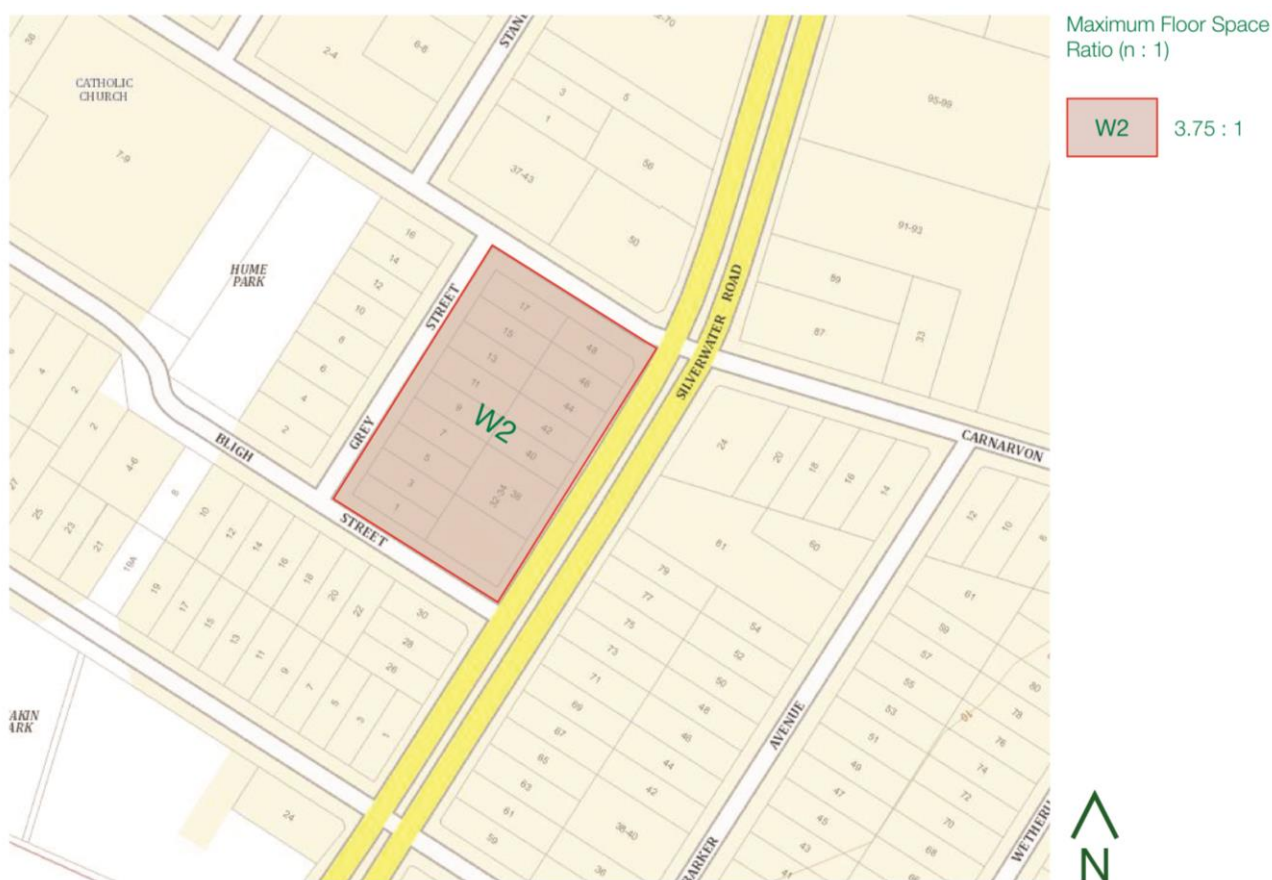


Figure 16 – Draft FSR Map

4.2.5. Development Control

It is proposed to apply the relevant provisions of Auburn Development Control Plan 2010.

4.3. Justification

The justification of the Planning Proposal is set out under the following probe questions asked in the Department of Planning and Infrastructure's *Guide on Preparing Planning Proposals*.

4.3.1. Need for the Planning Proposal

Is the Planning Proposal the result of any strategic study or report?

The Planning Proposal is not the result of any strategic study. It is proposed to replace the B6 Enterprise Corridor zoning with a B4 Mixed Use zone, on the basis that the detailed planning for the site and economic report prepared in support of the planning proposal has identified that the quantum of B6 Enterprise Corridor land, as provided for under Auburn LEP 2010, is not required (refer to detailed discussion at Section 5).

Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Auburn LEP 2010 is the principal environmental planning instrument applying to the site. Auburn LEP 2010 was prepared in accordance with the *Standard Instrument—Principal Local Environmental Plan* (Standard Instrument) and was gazetted on 29 October 2010. It is considered that a stand-alone planning proposal is the best means of achieving the objective and intended outcome for the site.

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

A detailed discussion of the planning proposal's relationship to the relevant strategies is included at Section 5. In summary:

- Under the Draft Sydney Metropolitan Strategy 2013, the site forms part of the Parramatta Road Corridor and Investigation for Transport and Urban Renewal area. The Parramatta Road Corridor offers prime regeneration opportunities to create lively, well-designed centres with improved north-south and east-west linkages. Providing additional housing as part of the development of the site is aligned with the priorities of the corridor, particularly providing higher population density in proximity to future business investment. The emphasis on improving access to and within the corridor (public transport, vehicular, pedestrian and cycle) will encourage further public transport patronage, assist to combat car dependency, and provide an impetus to boost development densities.
- The Draft West Central Subregional Strategy sets a housing capacity target 95,000 new dwelling from 2004 to 2031. Of these additional dwellings, Auburn LGA would accommodate 17,000 additional dwellings with at least 50 per cent of those dwellings to be located within 30 minutes by public transport to a Strategic Centre (i.e. Auburn). These housing targets were devised to assist Council in nominating land use zones and appropriate development standards to sites during the preparation of comprehensive LEPs. This means the remaining 50 per cent of additional dwellings can be accommodated through infill development. The Draft Subregional Strategy projects an increase of 61,000 jobs in the West Central Subregion by 2031. Of these, it is anticipated that 12,000 jobs will be provided locally in the Auburn LGA. In relation to employment in Silverwater, existing sites which presently function as industrial areas and provide a regional / national economic role (including heavy and light manufacturing or major freight activities have been identified as needing to be retained under the Draft West Central Strategy (page 30). The site is not currently used for industrial purposes, nor has it accommodated an industrial use in the past and does not contribute to job numbers in the subregion. Providing additional housing as part of the development of the site and up to 4,000m² of retail floor space will introduce an employment function of the site.
- Retail offerings in the future development of the site will need to be limited to complement rather than compete with established retail areas of Auburn, the West Central Subregion and Sydney as a whole. The Planning Proposal seeks to limit the amount of non-residential floor space on the site, to approximately 4,000m² of GFA. It is expected that this will comprise a small scale supermarket, specialities and a major liquor store. The Planning Proposal is not inconsistent with any s.117 directions.

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

A detailed discussion of the planning proposal's consistency with the relevant s.117 directions is included at Section 5. In summary, the planning proposal is not inconsistent with any relevant s.117 direction.

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

The site is occupied by a number of built structures. It is highly unlikely that the site would contain any critical habitat for threatened species, populations or ecological communities, or their habitats and it is not expected that any threatened species, populations or ecological communities will be adversely affected as a result of the proposal.

Has the planning proposal adequately addressed any social and economic effects?

A discussion of the planning proposal's social and economic effects is provided in Section 6. In summary, the proposal has a number of positive social impacts, namely:

- encourages pedestrian circulation throughout the site and surrounding areas;
- will provide high quality residential space that can contribute to housing affordability, provides housing in proximity to employment areas and through local spending will have flow on effects to local retailers and other service providers;
- will provide quality office and retail space (proposed to be limited) that complements existing centres within Auburn;
- provides permanent and construction employment opportunities;
- allows for greater natural surveillance of internal and external spaces on the site promoting safety;
- provides day and night time activation of the site through the introduction of a mix of retail and commercial uses at street level and along envisaged through-site link;
- promotes state government initiatives by providing high quality residential, commercial and modest component of retail space in close proximity to other services and facilities, in particular public transport;
- provides services and facilities to satisfy the needs of workers in the surrounding area (existing and future); and
- is a catalyst for future redevelopment within the area.

In relation to economic impacts:

- The potential impact of the proposed development on existing centres would be relatively modest ranging between -1.1% (Rhodes) to -10% (Newington). The impacts on centres such as the Auburn Town Centre and Rydalmere are estimated to be in the order of - 5.0% to -5.1%. Impacts of less than 5% generally are classified by retail analysts as being in the 'very low' category of impact. Accordingly, the impacts on the Auburn Town Centre and Rydalmere would be classified as being borderline between 'low' and 'very low'. The impact on the existing retail facilities at Newington of -10% would be classified as being in the 'medium' category of impact. Impacts of this order are unlikely to lead to any increase in retail vacancies and would not undermine the role or function of any centre—particularly one like Newington Marketplace which is anchored by a Woolworths supermarket and enjoys the patronage of a substantial adjacent workforce. Specifically, impacts such as those estimated would not lead to any reduction in the availability of retail services provided in established centres to residents of the trade area, or those living outside the trade area. All of the centres identified will continue to

trade in a viable manner.

- The proposed development at Silverwater will create additional employment both during the project's construction phase and over the longer term once the residential apartments are occupied and the retail centre operational. In relation to the construction phase, it is expected that 463 direct jobs will be created over the construction life of the development. In addition, it is expected that 578 indirect jobs will be created relating to supply industries (i.e. project architects, quantity surveyors, building suppliers, builders and the like). In relation to the proposed retail development of approximately 4,000m² on the subject site, it is estimated that approximately 143 positions would be created by the proposal on a combined full- and part-time basis.
- The subject site forms part of a precinct rezoned to B6 Enterprise Corridor in 2008. The precinct includes land on both sides of Silverwater Road which previously had a residential zoning, which permitted medium / high density housing. The overall intention of a B6 Enterprise Corridor zoning is to encourage commercial or industrial development along main roads like Silverwater Road. A specific objective of the B6 Enterprise Corridor is to limit retail development so as not to detract from the surrounding activity centre hierarchy. Since 2008, there has been virtually no redevelopment in this particular precinct for the types of uses envisaged under the B6 Enterprise Corridor zoning. These uses included:
 - bulky goods retailing
 - business premises
 - food and drink premises
 - hardware and building supplies
 - hotel and motel accommodation
 - light industries
 - warehouse and distribution centres.
- The absence of any significant redevelopment in this precinct since 2008 is explained by a number of factors including:
 - The Global Financial Crisis (GFC) - slowed suburban commercial and industrial development throughout the Sydney Region;
 - The Silverwater B6 precinct is competing with very extensive areas also zoned B6 along Parramatta Road. These areas contain major sites with significant redevelopment capacity and offer superior locational attributes for potential retail and commercial tenants than is the case with Silverwater Road; and
 - The Silverwater precinct, in which the subject site is located, has limited potential as far as bulky goods retailing is concerned. This is primarily because of the existing major concentration of bulky goods retailing along Parramatta Road particularly that to the west of Silverwater Road.
- Bulky goods retailers perform optimally when they are located within precincts with similar retailers. Consequently, these types of tenants are unlikely to be attracted to a location on Silverwater Road where there is no existing critical mass of bulky goods retailing. In relation to the potential of the precinct to accommodate hardware and building supply premises, specifically, 'Bunnings' is already well established in the Auburn area on Parramatta Road. While Woolworths Masters might be viewed as a potential occupier it is understood that Masters' stores require a site area of approximately 3 hectares. This is approximately three times the size of the subject site at Silverwater. Hotel and motel demand in this subregion of Sydney is primarily concentrated in

established centres such as Parramatta and Sydney Olympic Park. A location such as the subject site, without access to significant public transport, and on a major road carrying large volumes of industrial traffic, is always likely to be less preferable to other better located sites as far as the accommodation industry is concerned. It should also be noted that the demand for land in the Sydney Region for light industries is subdued at present due to the decline in the manufacturing sector in Australia. In addition, demand for new warehouses or distribution centres, while it does exist, favours locations further to the west of Auburn, and in particular in and around the significant logistics hub, which is developing in the Eastern Creek-Erskine Park corridor.

- There is merit in a proposal to replace the B6 Enterprise Corridor zoning with a B4 Mixed Use zoning which permits medium / high density residential development on the basis that:
 - The subject site was zoned for residential development prior to 2009. Hence, permitting residential development on the subject site would not be significantly out of context in terms of the established planning intention for this area.
 - There is no certainty that the land has been identified by Council for such housing in and around centres will in fact be taken up and developed for housing. For a range of reasons, that such land is not developed for residential purposes.
 - There is no particular reason why Council should refuse the subject rezoning and adhere strictly to a target of 17,000 additional dwellings if there is such existing demand for the provision of housing within Auburn LGA that might result in the target set in 2009 being exceeded.
 - The subject site is in single ownership and is able to be developed expeditiously whereas meeting of the departmental target in and around established centres in Auburn may take a significant time to be realised, or in fact, may never be achieved for a range of reasons.
 - Given the location of the subject site, it is likely residential units developed on it will be competitively priced thus contributing to improving overall housing affordability in Auburn LGA.
 - There is clearly strong demand for multi-unit housing in Auburn LGA. We note the Metropolitan Development Program 2012 prepared by the Department of Planning and Infrastructure identifies that in 2012, fully 97% of net dwelling completions in Auburn LGA were in the form of multi-unit housing—particularly in buildings of four storeys or more.

In summary, there appears to be limited demand for the types of uses envisaged under the B6 Enterprise Corridor in the Silverwater locality. By contrast, there appears to be a strong ongoing demand for multi-unit housing in Auburn LGA and the subject site (if rezoned to B4 Mixed Use) can make a positive contribution to both meeting the overall housing targets for Auburn LGA and increasing the supply of affordable dwellings in the short- to medium-term.

Is there adequate public infrastructure for the planning proposal?

Existing utility services are available to service the demand generated by the proposal.

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

There are no significant Commonwealth and State interests in the Planning Proposal other than providing a simplified planning framework and development outcome on the site consistent with the State's regional and subregional strategies. Relevant public authorities will be consulted during the post gateway determination process.

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Relationship to Strategic Planning Framework

5. Relationship to Strategic Planning Framework

The relationship of the Planning Proposal to the Metropolitan Plan for Sydney 2036 (2010), the Draft Metropolitan Strategy for Sydney (2013) and Draft West Central Subregional Strategy (2008) has been considered. The following section provides evidence that the Planning Proposal is consistent with housing and employment targets, outcomes and actions set out in each of these strategic planning documents. The Planning Proposal's consistency with State environmental planning policies and section 117 Directions is also examined.

5.1. Metropolitan Plan for Sydney 2036

The Metropolitan Plan predicts that Sydney will grow to a population of approximately 6 million people by 2036. To accommodate this growth, it is anticipated that there will be a need for an additional 770,000 dwellings, 10 million square metres of commercial floor space and 5 million square metres of additional retail floor space. Approximately 760,000 more jobs are targeted to be created in this period. The primary objective of the Metropolitan Strategy is to ensure that there is an adequate supply of land to enable the delivery of residential development to accommodate the forecast population growth. The strategy seeks to encourage the provision of that housing near jobs, transport and services, to improve housing affordability, upgrade the quality of new development and encourage urban renewal.

Silverwater is identified as forming part of a 'significant freight industry cluster' that extends from Chullora and Enfield in the south to Silverwater in the north. The Metropolitan Plan recommends that existing freight and industry clusters are to be strengthened and new clusters are to be supported (Action E3.3). The Metropolitan Plan does not specifically identify the site as an industry cluster that needs to be maintained or strengthened.

The redevelopment of the site for predominantly high density residential development has the potential to contribute to housing affordability (through unit size and product) and will also provide housing near jobs, in the Silverwater Industrial Area to the north and increase in non-residential development anticipated in the B6 Enterprise Corridor, particularly to the south of the site within the Parramatta Road Precinct which comprises the largest tract of B6 Enterprise Corridor zoned land. The planning proposal is not considered inconsistent with the Metropolitan Plan for Sydney 2036.

5.2. Draft Sydney Metropolitan Strategy 2013

The Draft Sydney Metropolitan Strategy 2013 was released in March 2013 for public comment and will supersede the current Metropolitan Strategy. The Draft Strategy is a revised approach to strategic metropolitan planning and is based on the State Government's 'NSW 2021: A plan to make NSW number one' business plan and the 'NSW Long Term Transport Master Plan'. The Draft Strategy centres on the following five key themes or outcomes in planning for Sydney to 2031 and beyond:

- Balanced growth - capitalises on infill and greenfield areas and grow existing local and strategic centres)
- A liveable city – sets minimum housing targets to be achieved through Urban Activation Precincts across Sydney
- Productivity and prosperity – sets minimum employment targets
- Healthy and resilient environment – balances urban growth and the natural environment

- Accessibility and connectivity – planning major renewal and growth areas around existing and planned transport and road infrastructure projects, including the WestConnex proposal and its effects on the Parramatta Road Corridor.

Under the Draft Strategy, the site forms part of the Parramatta Road Corridor and Investigation for Transport and Urban Renewal area. The Parramatta Road Corridor offers prime regeneration opportunities to create lively, well-designed centres with improved north-south and east-west linkages. Priorities for the corridor include:

- delivering stronger east-west connections along, and at grade north-south connections across Parramatta Road;
- focus on Sydney Olympic Park as a specialised precinct to be a major location for employment, high density housing, sports and entertainment;
- plan for well-designed housing including smaller dwellings and apartments to ensure the corridor achieves a higher population density that can stimulate business and retail investment;
- plan for a viable and frequent public transport service the length of the corridor.

Providing additional housing as part of the development of the site is aligned with the priorities of the corridor, particularly providing higher population density in proximity to future business investment. The emphasis on improving access to and within the corridor (public transport, vehicular, pedestrian and cycle) will encourage further public transport patronage, assist to combat car dependency, and provide an impetus to boost development densities.

5.3. Draft West Central Subregional Strategy (2008)

The Draft West Central Subregional Strategy (Draft Subregional Strategy) published by the Department of Planning and Infrastructure (DoPI) in 2008 provides a framework for Councils in the Central West subregion, including Auburn Council, for the distribution of housing and employment targets, to provide for balanced growth among the LGAs and to build on the regional strengths and bolster opportunities for sustainable development.

5.3.1. Housing

The Draft West Central Subregional Strategy sets a housing capacity target 95,000 new dwelling from 2004 to 2031. Of these additional dwellings, Auburn LGA would accommodate 17,000 additional dwellings with at least 50 per cent of those dwellings to be located within 30 minutes by public transport to a Strategic Centre (i.e. Auburn). These housing targets were devised to assist Council in nominating land use zones and appropriate development standards to sites during the preparation of comprehensive LEPs. This means the remaining 50 per cent of additional dwellings can be accommodated through infill development.

5.3.2. Employment

The Draft Subregional Strategy projects an increase of 61,000 jobs in the West Central Subregion by 2031. Of these, it is anticipated that 12,000 jobs will be provided locally in the Auburn LGA.

In relation to employment in Silverwater, existing sites which presently function as industrial areas and provide a regional / national economic role (including heavy and light manufacturing or major freight activities have been identified as needing to be retained under the Draft West Central Strategy (page 30). The site is not currently used for industrial purposes, nor has it accommodated an industrial use in the past and does not contribute to job

numbers in the subregion. Providing additional housing as part of the development of the site and up to 4,000m² of retail floor space will introduce an employment function of the site.

Retail offerings in the future development of the site will need to be limited to complement rather than compete with established retail areas of Auburn, the West Central Subregion and Sydney as a whole. The Planning Proposal seeks to limit the amount of non-residential floor space on the site, to approximately 4,000m² of GFA. It is expected that this will comprise a small scale supermarket, specialities and a major liquor store.

5.4. Section 117 Direction

The following section 117 Directions are relevant to the Planning Proposal:

Direction 1.1: Business and Industrial Zones

The objectives of this direction are to:

- a) encourage employment growth in suitable locations,*
- b) protect employment land in business and industrial zones, and*
- c) support the viability of identified strategic centres.*

The Planning Proposal delivers employment land in both business and retail sectors to the site, thereby encouraging employment growth in Silverwater and in the Auburn LGA as a whole. It is proposed to replace the B6 Enterprise Corridor zone for the site on the basis that the detailed planning for the site and economic report prepared in support of the planning proposal has identified that the quantum of B6 Enterprise Corridor land is not required in Silverwater (refer to detailed discussion at Section 6).

Direction 3.1: Residential Zones

The objectives of this direction area:

- a) to encourage a variety and choice of housing types to provide for existing and future housing needs,*
- b) to make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and*
- c) to minimise the impact of residential development on the environment and resource lands.*

The proposed B4 Mixed Use would make permissible on the site a flexible range of housing types, such as attached dwellings and residential flat buildings, which broadens the choice of housing stock available in the current housing market. The concept plans prepared by Mosca Pserras Architects demonstrate the potential of the site for future urban development and particularly new residential development. It is anticipated that the site is capable of accommodating up 23,539 m² of GFA (19,539m² of residential and 4,000m² of non-residential / retail GFA and a corresponding FSR of 3.75:1 which equates to approximately 226 residential apartments. The final mix of apartment types and built form will be determined as part of the detailed site investigations and structure planning to be undertaken post Gateway determination.

Direction 3.4: Integrating Land Use and Transport

The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:

- a) improving access to housing, jobs and services by walking, cycling and public transport, and*
- b) increasing the choice of available transport and reducing dependence on cars, and*

- c) *reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and*
- d) *supporting the efficient and viable operation of public transport services, and*
- e) *providing for the efficient movement of freight.*

The Planning Proposal is consistent with relevant guidance documents in that the site is suitably serviced by existing road infrastructure and transport services. It is expected that future capital works for public transport improvements will arise as a result of the site's location within the Parramatta Road Corridor.

Direction 6.3: Site Specific Provisions

The objective of this direction is to discourage unnecessarily restrictive site specific planning controls.

The Planning Proposal seeks to nominate land use zones drawn from the existing Auburn LEP 2010.

Direction 7.1: Implementation of the Metropolitan Plan for Sydney 2036

The objective of this direction is to give legal effect to the vision, transport and land use strategy, policies, outcomes and actions contained in the Metropolitan Plan for Sydney 2036.

As previously demonstrated in this report, the Planning Proposal is consistent with the vision, transport and land use strategy, policies, outcomes and actions contained in the Metropolitan Plan for Sydney 2036.

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Environmental, Social and Economic Impact

6. Environmental, Social and Economic Impact

This section addresses the environmental assessment of the Planning Proposal in respect to the relevant matters for consideration under section 55(1) of the EP&A Act.

6.1. Traffic

Colston Budd Hunt & Kafes has prepared a Transport Report for the concept plan and is appended to this report at **Appendix B**. The report assesses the projected impact of the concept plan on the existing road network through a review of NSW Government policies and travel access guides by NSW Roads and Maritime Service (RMS).

6.1.1. Access and Servicing

A single vehicular point to the development would be provided from Grey Street. Driveways will provide for two-way traffic, with all movements permitted, and should be provided with widths and grades in accordance with the Australian Standard for Parking Facilities (Part 1: Off-street car parking), AS 2890.1:2004. The driveways will include maximum grades of 1:20 for six metres inside the property line for appropriate visibility between pedestrians and exiting vehicles. Specific details on driveway gradients would be required at the development application stage for the detailed design of the concept proposal.

Appropriate provision for service vehicles would be included with any future development on the site. Service vehicles will include garbage collection and deliveries to the retail and commercial components. The design should provide for service vehicles to enter and exit the site in a forward direction, with service vehicle areas to be provided in accordance with AS 2890.2 – 2002. The size of trucks will depend on final retail tenancies, but will likely include rigid trucks and semi trailers.

6.1.2. Public Transport, Walking and Cycling

The site is in close proximity to an existing bus route that connects the site to Auburn Railway Station. The appropriate provision of car parking spaces for the development in accordance with car parking rates specified in relevant development control plans will affect the level of public transport patronage and the use of alternative modes of transport, i.e. walking and cycling. The provision of bicycle parking in the development will encourage residents and visitors to utilise the nearby Auburn and Sydney Olympic Park cycleway.

6.1.3. Traffic Generation and Effects

The concept proposal, as a medium and high density residential development, would have its strongest impacts on the road network during weekday morning and afternoon peak periods.

Adopting the rates set out in the RMS 'Guide to Traffic Generating Development', the residential component of the development would generate 65 to 90 vehicles per hour in both directions during peak periods. Applying these rates for commercial/retail uses reveals that the commercial/retail component of the development would generate approximately 90 and 440 vehicles per hour in both directions during morning and afternoon peak hours respectively. Twenty five (25) per cent of the total projected traffic generation relative to the commercial/retail component of the development would be 'passing trade'.

Overall, the concept proposal would result in a total of 160 to 190 vehicles per hour (two way) during morning peak period and 510 to 540 vehicles per vehicle (two way) during afternoon peak period. Silverwater Road, Carnarvon Street, Bligh Street and Grey Street would be some 20 to 125 vehicles per hour (two-way) during morning peak periods and some 50 to 375 vehicles per hour (two way) during afternoon peak periods.

The concept proposal would have modest impacts on the operations of intersections of Carnarvon Street and Bligh with Silverwater Road. The level of service of intersections of Grey Street with Carnarvon Street and Bligh Street will be maintained.

6.2. Social Impact

The concept proposal will result in a number of positive social impacts including:

- encourages pedestrian circulation throughout the site and surrounding areas;
- will provide high quality residential space that can contribute to housing affordability, provides housing in proximity to employment areas and through local spending will have flow on effects to local retailers and other service providers;
- will provide quality office and retail space (proposed to be limited) that complements existing centres within Auburn;
- provides permanent and construction employment opportunities (refer to Section 6.3 below);
- allows for greater natural surveillance of internal and external spaces on the site promoting safety;
- provides day and night time activation of the site through the introduction of a mix of retail and commercial uses at street level and along envisaged through-site link;
- promotes state government initiatives by providing high quality residential, commercial and modest component of retail space in close proximity to other services and facilities, in particular public transport;
- provides services and facilities to satisfy the needs of workers in the surrounding area (existing and future); and
- is a catalyst for future redevelopment within the area.

6.3. Economic Impact

An Economic Assessment has been prepared by Leyshon Consulting and is included at **Appendix C**. The purpose of the economic assessment is to examine the need for, and economic implications of, the retail component of the proposed development. In preparing this report, the following tasks have been undertaken:

- identified a likely trade area for the project's retail component;
- prepared estimates of population growth and annual available retail spending in the trade area for the period 2011-21;
- reviewed existing retail services in and adjacent to the trade area;
- estimated the likely demand for retail services on the subject site;
- estimated the likely impact of the retail element of the proposed development on existing retail centres in and adjacent to the trade area.

In summary, the report concludes that there is the need for a modest provision of retail services on the subject site to meet the needs of both residents of the area and workers in the adjacent Silverwater/Newington industrial area. The impact of the proposed development on existing centres will be minimal; and from an economic perspective, the retail element of the proposed development will result in a net community benefit.

A detailed discussion of the economic assessment report is provided below.

6.3.1. Existing retail services

There are a number of very small convenience retail outlets located within the Silverwater Industrial Area. These mainly provide takeaway food and coffee and some limited convenience goods for local workers. The only retail services of any significance in the suburbs of Silverwater/Newington are those provided by Newington Marketplace. It comprises some 3,632m² of retail floor space. The centre's anchor tenant is a Woolworths supermarket of 2,218m². The centre contains some 19 specialty shops together with a Woolworths Petrol Plus outlet. Adjacent to Newington Marketplace are a number of restaurants/cafés which together comprise a further 1,100m². These are located at street level in several residential buildings to the north and east of Newington Marketplace.

To the south of the M4 the largest concentration of retail facilities is the Auburn Town Centre. The Town Centre contains three supermarkets (Coles, Woolworths and ALDI) together with extensive strip shopping. In total we estimate the Auburn Town Centre comprises some 35,000m² of retail floor space. There are a significant number of small retail premises in the centre. The largest individual component of retailing in the Town Centre is the enclosed Auburn Central centre which is located adjacent to the Auburn railway station. Auburn Central contains 17,624m² of retail floor space and is anchored by a Big W discount department store (DDS; 7,159m²) and a Woolworths supermarket (3,650m²). Auburn Central has some 51 specialty shops over two levels.

In 2011, a large (14,000m²) Costco store opened at 12-17 Parramatta Road, Auburn. The Costco store retails groceries, fresh food and a wide range of general merchandise and, being the only Costco within the Sydney Region at present is likely to have a metropolitan-wide catchment.

Retail facilities of around 5,000m² are found at Lidcombe. Strip retailing exists on both Railway Street and Joseph Street adjacent to Lidcombe Railway Station. The Lidcombe centre increasingly is being dominated by Asian-owned and operated businesses and does not contain a supermarket of any significance. To the north of Silverwater, the nearest retail facilities are those located in Ermington. The Ermington centre which comprises some 3,600m² is located at the intersection of River and Victoria Roads and is anchored by a Woolworths supermarket of some 2,100m².

6.3.2. Trade Area

Trade areas are usually defined having regard to a number of factors including:

- location of other competing shopping centres;
- the existing road network surrounding the proposed site;
- significant geographic barriers such as rivers, railway lines, major roads.

In this instance, geographic barriers are of particular importance with both the Parramatta River in the north and the Duck River in the west forming significant barriers. In addition, Haslams Creek and Sydney Olympic Park form the eastern boundary of the trade area. To the south of the Silverwater site, the M4 Motorway potentially constitutes a significant boundary although both the overpass at Stubbs Street (not far from the subject site) and Silverwater Road itself allow access from residential areas to the south of the M4 to the subject site and vice versa.

The defined trade area is identified in Figure 2.1 of the Economic Assessment (page 7) and can generally be described as:

- Primary Trade Area (PTA) – incorporates the existing suburb of Silverwater;
- Secondary Trade Area (STA) – comprises the suburb of Newington; and
- STA South – includes part of the suburb of Auburn South of the M4, north of Rawson / Boorea Streets, west of Birrie Avenue and east of Hampstead Road.

6.3.3. Summary of Trade Area Demography

The Silverwater trade area has below average socio-economic characteristics as revealed by statistics from the 2011 Census. The recently arrived population in the STA East (Newington) are substantially different demographically to the population of “old Silverwater” which make up the PTA or the Auburn area to the south of the M4.

6.3.4. Population

Based on 2011 Census data, Leyshon Consulting estimate 22,245 people resided in the trade area in 2011. By 2021, Leyshon Consulting have forecast the trade area’s population at 25,265 persons (an increase of +3,020 residents).

While negligible population growth is expected in the PTA over the forecast period, average annual population growth of between +1.25% and +1.5% per annum is forecast for the STA East and STA South. The average annual growth for the trade area as a whole between 2011-21 is estimated at +1.28 % per annum.

While new housing development in the trade area has slowed following the development of Newington, the younger age profile of that area, as well as the substantial percentage of the population, comprised of young adult couple families. These people are in what is commonly described as being in the “family formation stage” of their lives which will result in a relatively high rate of natural population increase in the trade area over the forthcoming decade. In the STA South such growth will be also be enhanced by further medium density housing development in and around the Auburn Town Centre.

6.3.5. Floor Space Demand

The growth in available retail spending discussed above will support the additional provision of retail floorspace either within the trade area and/or in the surrounding region. Leyshon Consulting estimate an increase in annual available retail spending of \$65.4 million broadly would support an additional 10,900m² of retail floor space at an average sales rate of \$6,000 per m² per annum. An increase in annual available supermarket spending of \$20.9 million meanwhile would support an additional 2,200m² of supermarket floor space at an average sales rate of \$9,500 per m² per annum.

6.3.6. Worker Expenditure

The site is immediately adjacent to a major employment area. The New South Wales Bureau of Transport Studies (BTS) estimated in 2012 that 4,085 workers were employed in the Silverwater/Newington area. It is expected the average employee in the area could spend \$7.00 per day on convenience retail items including take-away food and beverages. On this basis, workers in the Newington and Silverwater area would generate annual work-based retail spending of around \$6.565 million (\$2012) in 2011. In essence, therefore, the workers in the area would add only

about 2.9% to the pool of available expenditure generated by trade area residents (\$223.9 million per annum [\$2012]) in 2011.

6.3.7. Potential Centre Sales

For the purposes of this assessment, it has been assumed that the site would contain a medium-size supermarket with a component of associated specialty shops. It is not considered there is any potential for a full-line supermarket (that is, one greater than 3,000m²) on the site having regard to catchment conditions.

The proposed centre could potentially achieve total annual sales of some \$18.7 million in 2016 (\$2012). These sales would be comprised as follows:

- Supermarket ... \$13.3 million per annum
- Specialties ... \$5.4 million per annum
- Total ... \$18.7 million per annum

The proposed centre would achieve a total market share within its trade area of 5.1% of available retail spending. The market shares achieved in each specific sector of the trade area would be as follows:

- PTA ... 11.4%.
- STA East ... 5.5%.
- STA South ... 3.1%.

Some 30% of total centre sales are assumed to originate from spending by people residing outside the trade area. These are likely to be a combination of “passing trade” (i.e. motorists travelling north or south along Silverwater Road or workers in the surrounding area, but in particular those employed to the north of the subject site and to the west of Silverwater Road).

Based on widely accepted average turnover rates for supermarkets and specialty shops in Australian neighbourhood-scale shopping centres of some \$8,500 per m² per annum for supermarkets and \$6,500 per m² per annum for specialty shops, the estimated turnover of \$18.7 million in 2016 would support the following amount of floor space:

- Supermarket ... 1,565 m².
- Specialties ... 831 m².
- Total Centre ... 2,396 m².

It is also likely the Silverwater site, given its location, would be suitable for a large format liquor store such as those operated by Dan Murphys. We note that no such large format liquor store currently exists in the area although a smaller format liquor store operates at Newington Marketplace. We consider that such a store would attract trade from a wide geographic area including substantial spending from businesses established in the surrounding area. Such a store potentially could attract annual sales of about \$9.0 million in 2016 (\$2012). This would increase total potential centre sales to about \$27.7 million per annum in 2016 (\$2012).

6.3.8. Impact Assessment

6.3.8.1. Impact on Centre Sales

The potential impact of the proposed development on existing centres would be relatively modest ranging between -1.1% (Rhodes) to -10% (Newington). The impacts on centres such as the Auburn Town Centre and Rydalmere are estimated to be in the order of - 5.0% to -5.1%. Impacts of less than 5% generally are classified by retail analysts as being in the 'very low' category of impact. Accordingly, the impacts on the Auburn Town Centre and Rydalmere would be classified as being borderline between 'low' and 'very low'. The impact on the existing retail facilities at Newington of -10% would be classified as being in the 'medium' category of impact. Impacts of this order are unlikely to lead to any increase in retail vacancies and would not undermine the role or function of any centre—particularly one like Newington Marketplace which is anchored by a Woolworths supermarket and enjoys the patronage of a substantial adjacent workforce. Specifically, impacts such as those estimated would not lead to any reduction in the availability of retail services provided in established centres to residents of the trade area, or those living outside the trade area. All of the centres identified will continue to trade in a viable manner.

6.3.8.2. Employment Creation

The proposed development at Silverwater will create additional employment both during the project's construction phase and over the longer term once the residential apartments are occupied and the retail centre operational. In relation to the construction phase, we are advised that the likely construction value of the project will be in the order of \$50 million. Based on known construction/employment ratios, capital expenditure of this level would create approximately 463 direct and 578 indirect (supply industries) positions during the construction phase of the project. In relation to the proposed retail development of approximately 4,000m² on the subject site, we estimate that approximately 143 positions would be created by the proposal on a combined full- and part-time basis.

6.3.8.3. B6 Enterprise Corridor Uses

The subject site forms part of a precinct rezoned to B6 Enterprise Corridor in 2008. The precinct includes land on both sides of Silverwater Road which previously had a residential zoning, which permitted medium / high density housing. The overall intention of a B6 Enterprise Corridor zoning is to encourage commercial or industrial development along main roads like Silverwater Road. A specific objective of the B6 Enterprise Corridor is to limit retail development so as not to detract from the surrounding activity centre hierarchy.

Since 2008, there has been virtually no redevelopment in this particular precinct for the types of uses envisaged under the B6 Enterprise Corridor zoning. These uses included:

- bulky goods retailing
- business premises
- food and drink premises
- hardware and building supplies
- hotel and motel accommodation
- light industries
- warehouse and distribution centres.

The absence of any significant redevelopment in this precinct since 2008 is explained by a number of factors including:

- The Global Financial Crisis (GFC) - slowed suburban commercial and industrial development throughout the Sydney Region;
- The Silverwater B6 precinct is competing with very extensive areas also zoned B6 along Parramatta Road. These areas contain major sites with significant redevelopment capacity and offer superior locational attributes for potential retail and commercial tenants than is the case with Silverwater Road; and
- The Silverwater precinct, in which the subject site is located, has limited potential as far as bulky goods retailing is concerned. This is primarily because of the existing major concentration of bulky goods retailing along Parramatta Road particularly that to the west of Silverwater Road.

Bulky goods retailers perform optimally when they are located within precincts with similar retailers. Consequently, these types of tenants are unlikely to be attracted to a location on Silverwater Road where there is no existing critical mass of bulky goods retailing. In relation to the potential of the precinct to accommodate hardware and building supply premises, specifically, 'Bunnings' is already well established in the Auburn area on Parramatta Road. While Woolworths Masters might be viewed as a potential occupier it is understood that Masters' stores require a site area of approximately 3 hectares. This is approximately three times the size of the subject site at Silverwater.

Hotel and motel demand in this subregion of Sydney is primarily concentrated in established centres such as Parramatta and Sydney Olympic Park. A location such as the subject site, without access to significant public transport, and on a major road carrying large volumes of industrial traffic, is always likely to be less preferable to other better located sites as far as the accommodation industry is concerned.

It should also be noted that the demand for land in the Sydney Region for light industries is subdued at present due to the decline in the manufacturing sector in Australia. In addition, demand for new warehouses or distribution centres, while it does exist, favours locations further to the west of Auburn, and in particular in and around the significant logistics hub, which is developing in the Eastern Creek-Erskine Park corridor.

6.3.8.4. Housing Demand

In 2009 Auburn Council completed an analysis of the potential to accommodate additional residential development in Auburn (Dwelling Target Analysis – March 2009). That report concluded no additional "up zoning" of land was required to meet the target of an additional 17,000 dwellings in Auburn Local Government Area (LGA). This target was established in the Draft West Central Subregional Strategy prepared by the (then) Department of Planning in late 2007. Council officers have indicated that this conclusion would apply to the subject proposal at Silverwater.

The Dwelling Target Analysis report noted that of the 17,000 dwelling target, 6,000 dwellings have been "allocated" to the Olympic Park-Rhodes Specialised centre. The remaining 11,000 dwellings are intended to be provided elsewhere in Auburn LGA. The report concluded that a significant component of the dwelling target could be met through the redevelopment of so-called 'brown fields' sites and that development in and around existing centres could also contribute to meeting the target of an additional 11,000 dwellings. The major 'brown fields' sites identified in Auburn included the former Lidcombe Hospital site and former industrial sites at Wentworth Point

(Homebush Bay North). In total, such sites were estimated to be capable of providing 4,298 dwellings over a 15 year period from 2009 or 39% of the 11,000 allocated dwelling target for Auburn LGA.

Notwithstanding the above, there is merit in a proposal to change the zoning of the subject site at Silverwater so that it permits medium density residential development. The reasoning in this regard is that:

- The subject site was zoned for residential development prior to 2009. Hence, permitting residential development on the subject site would not be significantly out of context in terms of the established planning intention for this area.
- There is no certainty that the land has been identified by Council for such housing in and around centres will in fact be taken up and developed for housing. For a range of reasons, that such land is not developed for residential purposes.
- There is no particular reason why Council should refuse the subject rezoning and adhere strictly to a target of 17,000 additional dwellings if there is such existing demand for the provision of housing within Auburn LGA that might result in the target set in 2009 being exceeded.
- The subject site is in single ownership and is able to be developed expeditiously whereas meeting of the departmental target in and around established centres in Auburn may take a significant time to be realised, or in fact, may never be achieved for a range of reasons.
- Given the location of the subject site, it is likely residential units developed on it will be competitively priced thus contributing to improving overall housing affordability in Auburn LGA.
- There is clearly strong demand for multi-unit housing in Auburn LGA. We note the Metropolitan Development Program 2012 prepared by the Department of Planning and Infrastructure identifies that in 2012, fully 97% of net dwelling completions in Auburn LGA were in the form of multi-unit housing—particularly in buildings of four storeys or more.

In summary, there appears to be limited demand for the types of uses envisaged under the B6 Enterprise Corridor in the Silverwater locality. By contrast, there appears to be a strong ongoing demand for multi-unit housing in Auburn LGA and the subject site (if rezoned to B4 Mixed Use) can make a positive contribution to both meeting the overall housing targets for Auburn LGA and increasing the supply of affordable dwellings in the short- to medium-term.

6.4. Community Consultation

Community consultation will be undertaken in accordance with the requirements of the Gateway determination.

7

APP Corporation



Conclusion

7. Conclusion

The Planning Proposal is submitted to Council in support of an amendment to Auburn LEP 2010 to rezone a 6,277m² parcel of land at 32-48 Silverwater Road, Silverwater from B6 Enterprise Corridor to B4 Mixed Use. It is also proposed to amend the development standards that presently apply to the site in relation to height of buildings and floor space ratio to standards commensurate with the proposed mixed use zone.

The redevelopment opportunities on site facilitated by this planning proposal will revitalise the immediate area, particularly the western side of Silverwater Road which generally remains undeveloped notwithstanding its current B6 enterprise corridor zoning. This area also lacks services and facilities to meet the daily needs of existing residents in the area, additional incoming residents as a result of density increases under the existing LEP and existing and future workers in the Silverwater Industrial Area and within the main area of B6 Enterprise Corridor zoned land on the opposite side of the M4 Motorway.

This Planning Proposal demonstrates that residential development in the form of residential flat buildings with a modest component of ground floor retail / commercial floor space can be developed on the site. The range of land uses permissible within the B4 Mixed Use zone have the ability to service and sustain the surrounding residential, business corridor and industrial land uses by providing residential accommodation for people close to places of work and a modest amount of retail / commercial to provide for the needs of existing and future residents and workers. The site redeveloped would also deliver public benefits in the form of a publicly accessible through-site link with the potential for active uses fronting onto it. This has the potential to become an important meeting place / hub for residents, visitors and workers and the like. This planning proposal consolidates 14 lots within the broader precinct into a single parcel of land and facilitates the orderly and economic development of land. Opportunity exists concurrent with the consideration of this Planning Proposal for the Council to review relevant planning controls for the broader precinct.

The redevelopment of the site for predominantly high density residential development has the potential to contribute to housing affordability (through unit size and product) and will also provide housing near jobs, in the Silverwater Industrial Area to the north and increase in non-residential development anticipated in the B6 Enterprise Corridor, particularly to the south of the site within the Parramatta Road Precinct which comprises the largest tract of B6 Enterprise Corridor zoned land. The planning proposal is not considered inconsistent with the Metropolitan Plan for Sydney 2036.

In relation to strategic planning framework and policy:

- Under the Draft Sydney Metropolitan Strategy 2013, the site forms part of the Parramatta Road Corridor and Investigation for Transport and Urban Renewal area. The Parramatta Road Corridor offers prime regeneration opportunities to create lively, well-designed centres with improved north-south and east-west linkages. Providing additional housing as part of the development of the site is aligned with the priorities of the corridor, particularly providing higher population density in proximity to future business investment. The emphasis on improving access to and within the corridor (public transport, vehicular, pedestrian and cycle) will encourage further public transport patronage, assist to combat car dependency, and provide an impetus to boost development densities.

- The Draft West Central Subregional Strategy sets a housing capacity target 95,000 new dwelling from 2004 to 2031. Of these additional dwellings, Auburn LGA would accommodate 17,000 additional dwellings with at least 50 per cent of those dwellings to be located within 30 minutes by public transport to a Strategic Centre (i.e. Auburn). These housing targets were devised to assist Council in nominating land use zones and appropriate development standards to sites during the preparation of comprehensive LEPs. This means the remaining 50 per cent of additional dwellings can be accommodated through infill development. The Draft Subregional Strategy projects an increase of 61,000 jobs in the West Central Subregion by 2031. Of these, it is anticipated that 12,000 jobs will be provided locally in the Auburn LGA. In relation to employment in Silverwater, existing sites which presently function as industrial areas and provide a regional / national economic role (including heavy and light manufacturing or major freight activities have been identified as needing to be retained under the Draft West Central Strategy (page 30). The site is not currently used for industrial purposes, nor has it accommodated an industrial use in the past and does not contribute to job numbers in the subregion. Providing additional housing as part of the development of the site and up to 4,000m² of retail floor space will introduce an employment function of the site.
- Retail offerings in the future development of the site will need to be limited to complement rather than compete with established retail areas of Auburn, the West Central Subregion and Sydney as a whole. The Planning Proposal seeks to limit the amount of non-residential floor space on the site, to approximately 4,000m² of GFA. It is expected that this will comprise a small scale supermarket, specialities and a major liquor store. The Planning Proposal is not inconsistent with any s.117 directions.

The site is occupied by a number of built structures. It is highly unlikely that the site would contain any critical habitat for threatened species, populations or ecological communities, or their habitats and it is not expected that any threatened species, populations or ecological communities will be adversely affected as a result of the proposal.

The Planning Proposal has a number of positive social impacts, namely:

- encourages pedestrian circulation throughout the site and surrounding areas;
- will provide high quality residential space that can contribute to housing affordability, provides housing in proximity to employment areas and through local spending will have flow on effects to local retailers and other service providers;
- will provide quality office and retail space (proposed to be limited) that complements existing centres within Auburn;
- provides permanent and construction employment opportunities;
- allows for greater natural surveillance of internal and external spaces on the site promoting safety;
- provides day and night time activation of the site through the introduction of a mix of retail and commercial uses at street level and along envisaged through-site link;
- promotes state government initiatives by providing high quality residential, commercial and modest component of retail space in close proximity to other services and facilities, in particular public transport;
- provides services and facilities to satisfy the needs of workers in the surrounding area (existing and future); and
- is a catalyst for future redevelopment within the area.

In relation to economic impacts:

- The potential impact of the proposed development on existing centres would be relatively modest ranging between -1.1% (Rhodes) to -10% (Newington). The impacts on centres such as the Auburn Town Centre and Rydalmere are estimated to be in the order of - 5.0% to -5.1%. Impacts of less than 5% generally are classified by retail analysts as being in the 'very low' category of impact. Accordingly, the impacts on the Auburn Town Centre and Rydalmere would be classified as being borderline between 'low' and 'very low'. The impact on the existing retail facilities at Newington of -10% would be classified as being in the 'medium' category of impact. Impacts of this order are unlikely to lead to any increase in retail vacancies and would not undermine the role or function of any centre—particularly one like Newington Marketplace which is anchored by a Woolworths supermarket and enjoys the patronage of a substantial adjacent workforce. Specifically, impacts such as those estimated would not lead to any reduction in the availability of retail services provided in established centres to residents of the trade area, or those living outside the trade area. All of the centres identified will continue to trade in a viable manner.
-
- The proposed development at Silverwater will create additional employment both during the project's construction phase and over the longer term once the residential apartments are occupied and the retail centre operational. In relation to the construction phase, it is expected that 463 direct and 578 indirect jobs will be created. In relation to the proposed retail development of approximately 4,000m² on the subject site, it is estimated that approximately 143 positions would be created by the proposal on a combined full- and part-time basis.
- The subject site forms part of a precinct rezoned to B6 Enterprise Corridor in 2008. The precinct includes land on both sides of Silverwater Road which previously had a residential zoning, which permitted medium / high density housing. The overall intention of a B6 Enterprise Corridor zoning is to encourage commercial or industrial development along main roads like Silverwater Road. A specific objective of the B6 Enterprise Corridor is to limit retail development so as not to detract from the surrounding activity centre hierarchy. Since 2008, there has been virtually no redevelopment in this particular precinct for the types of uses envisaged under the B6 Enterprise Corridor zoning. These uses included:
 - bulky goods retailing
 - business premises
 - food and drink premises
 - hardware and building supplies
 - hotel and motel accommodation
 - light industries
 - warehouse and distribution centres.
- The absence of any significant redevelopment in this precinct since 2008 is explained by a number of factors including:
 - The Global Financial Crisis (GFC) - slowed suburban commercial and industrial development throughout the Sydney Region;
 - The Silverwater B6 precinct is competing with very extensive areas also zoned B6 along Parramatta Road. These areas contain major sites with significant redevelopment capacity and offer superior locational attributes for potential retail and commercial tenants than is the case with Silverwater Road; and

- The Silverwater precinct, in which the subject site is located, has limited potential as far as bulky goods retailing is concerned. This is primarily because of the existing major concentration of bulky goods retailing along Parramatta Road particularly that to the west of Silverwater Road.
- Bulky goods retailers perform optimally when they are located within precincts with similar retailers. Consequently, these types of tenants are unlikely to be attracted to a location on Silverwater Road where there is no existing critical mass of bulky goods retailing. In relation to the potential of the precinct to accommodate hardware and building supply premises, specifically, 'Bunnings' is already well established in the Auburn area on Parramatta Road. While Woolworths Masters might be viewed as a potential occupier it is understood that Masters' stores require a site area of approximately 3 hectares. This is approximately three times the size of the subject site at Silverwater. Hotel and motel demand in this subregion of Sydney is primarily concentrated in established centres such as Parramatta and Sydney Olympic Park. A location such as the subject site, without access to significant public transport, and on a major road carrying large volumes of industrial traffic, is always likely to be less preferable to other better located sites as far as the accommodation industry is concerned. It should also be noted that the demand for land in the Sydney Region for light industries is subdued at present due to the decline in the manufacturing sector in Australia. In addition, demand for new warehouses or distribution centres, while it does exist, favours locations further to the west of Auburn, and in particular in and around the significant logistics hub, which is developing in the Eastern Creek-Erskine Park corridor.
- There is merit in a proposal to replace the B6 Enterprise Corridor zoning with a B4 Mixed Use zoning which permits medium / high density residential development on the basis that:
 - The subject site was zoned for residential development prior to 2009. Hence, permitting residential development on the subject site would not be significantly out of context in terms of the established planning intention for this area.
 - There is no certainty that the land has been identified by Council for such housing in and around centres will in fact be taken up and developed for housing. For a range of reasons, that such land is not developed for residential purposes.
 - There is no particular reason why Council should refuse the subject rezoning and adhere strictly to a target of 17,000 additional dwellings if there is such existing demand for the provision of housing within Auburn LGA that might result in the target set in 2009 being exceeded.
 - The subject site is in single ownership and is able to be developed expeditiously whereas meeting of the departmental target in and around established centres in Auburn may take a significant time to be realised, or in fact, may never be achieved for a range of reasons.
 - Given the location of the subject site, it is likely residential units developed on it will be competitively priced thus contributing to improving overall housing affordability in Auburn LGA.
 - There is clearly strong demand for multi-unit housing in Auburn LGA. We note the Metropolitan Development Program 2012 prepared by the Department of Planning and Infrastructure identifies that in 2012, fully 97% of net dwelling completions in Auburn LGA were in the form of multi-unit housing—particularly in buildings of four storeys or more.

In summary, there appears to be limited demand for the types of uses envisaged under the B6 Enterprise Corridor in the Silverwater locality. By contrast, there appears to be a strong ongoing demand for multi-unit housing in Auburn LGA and the subject site (if rezoned to B4 Mixed Use) can make a positive contribution to both meeting the overall housing targets for Auburn LGA and increasing the supply of affordable dwellings in the short- to medium-term and is worthy of Council's support.

Appendix A – Concept Plans
