

Amendment to Parramatta LEP 2011- 2 Factory Street, Granville (rezone from IN1 General Industrial to R4 High Density Residential)

Proposal Title :	Amendment to Parramatta LEP 2011- 2 Factory Street, Granville (rezone from IN1 General Industrial to R4 High Density Residential)		
Proposal Summary :	The planning proposal intends to rezone the subject site from IN1 General Industrial to R4 High Density Residential. In addition, it seeks to change the maximum building height of the site from 12m to 16m, 19m and 22m, and change the maximum floor space ratio of the site from 1:1 to 1.9:1.		
PP Number :	PP_2013_PARRA_008_00	Dop File No :	13/13508

Proposal Details

Date Planning Proposal Received :	22-Aug-2013	LGA covered :	Parramatta
Region :	Sydney Region West	RPA :	Parramatta City Council
State Electorate :	GRANVILLE	Section of the Act :	55 - Planning Proposal
LEP Type :	Spot Rezoning		

Location Details

Street :	2 Factory Street		
Suburb :	Granville	City :	Sydney
		Postcode :	2142
Land Parcel :	Lot 22 DP569501		

DoP Planning Officer Contact Details

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Land Release Data

Growth Centre :		Release Area Name :	
Regional / Sub Regional Strategy :	Metro West Central subregion	Consistent with Strategy :	No

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MDP Number :		Date of Release :	
Area of Release (Ha) :		Type of Release (eg Residential / Employment land) :	N/A
No. of Lots :	1	No. of Dwellings (where relevant) :	179
Gross Floor Area :	10,700.00	No of Jobs Created :	0

The NSW Government Lobbyists Code of Conduct has been complied with :

If No, comment :

Have there been meetings or communications with registered lobbyists? :

No

If Yes, comment :

Supporting notes

Internal Supporting Notes :

Further information was sought from Council regarding the planning proposal's adequacy for residential development. The information was provided on the date of the meeting with Council. The date of receipt reflects this.

The Employment Lands Unit of the Department of Planning and Infrastructure has provided the following comments on the proposal:

Location

- It is noted that the subject site is positioned adjacent to Clyde Railway Station providing access to Parramatta, Sydney Olympic Park and Sydney CBD; and land immediately adjoining to the west of the subject site has recently been zoned for higher density residential development.

Buffer

- The subject site is located within the South Clyde Industrial Precinct, and accounts for 1.07 hectares of the 11.8 ha precinct (9%). However, directly adjacent to the South Clyde Industrial Precinct is the Clyde Industrial Precinct (16.5 ha) and the Clyburn Industrial Precinct (43.4 ha).
- The South Clyde Industrial Precinct provides some buffer from industrial uses in these adjacent precincts (including 24 hour rail maintenance) and surrounding residential uses.

Loss of Employment Land

- The subject site accounts for 0.18% of the existing employment land in the Parramatta LGA, based on the latest publicly available ELDP data. Therefore, rezoning of the subject site will not constitute a significant loss of employment land.

Future Land Use Efficiency

- Rezoning 2 Factory Street, Granville from IN1 General Industrial to R4 High Density Residential will split the remainder of South Clyde Industrial Precinct into two areas, potentially reducing future industrial land efficiency.

Acknowledgement of Constraints for Future Industrial Uses

- The subject site may be constrained for many future industrial uses and

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industrial redevelopment due to the age of the current structure, size, location, limited access to freight, logistics and distribution and limited potential of lot consolidation. However, good access to public transport could support higher density employment uses.

Access

- Whilst the subject site appears close to the M4 Motorway, access is difficult due to its location on the southern side of the railway line.

Draft Parramatta Employment Lands Study*

- Adjoining uses within the South Clyde Industrial Precinct include Australia Post Depot and a TABcorp call centre. However, the draft Parramatta Employment Lands Study ('the draft study') suggests there is a strong proportion of freight and logistics in the area, which should be protected so as to not diminish the precincts efficiency.
- The draft study also notes that this precinct has the highest employment density of any employment precinct in Parramatta at 96 persons/ha.
- The draft study recommends retaining IN1 General Industrial zoned land in the South Clyde Industrial Precinct as it supports a range of industrial and warehousing uses, including some that support the adjacent Clyburn Industrial Precinct (Marshalling Yards).
- The study also notes that this precinct provides a buffer to surrounding residential uses from the Marshalling Yards. However, in the SWOT analysis (Table 6.75), the draft study acknowledges that there may be an opportunity for residential redevelopment due to proximity to the rail station, though notes that any potential redevelopment would diminish the precinct's effectiveness as an efficient employment land precinct.

- * Note: Council officers have advised that 'council is awaiting the final study from consultants. Staff are yet to determine if and when the study and its recommendations would be put to council.'

MDM Report

- The report prepared by MDM Pty Ltd indicates that as at May 2012, there were a significant amount of industrial sites with buildings over 500m² available for lease across four key precincts in proximity to the subject site. These areas included:

- o South Granville / Clyde – 72,000m²
- o Camellia / Rose Hill – 104,975m²
- o Rydalmere / Ermington – 35,808 m²
- o North Parramatta / Northmead – 18,805m²

Total = 231,588m²

Conclusion

If the rezoning is to proceed, consideration should be given as to how the new residential development will be adequately buffered from adjoining industrial uses so as to not affect their operations.

Summary of Comments

In summary, it is noted that the above advice acknowledges:

- Rezoning of the subject site will not constitute a significant loss of employment land in relation to the total amount of existing employment land in the LGA.
- There may be an opportunity for residential redevelopment due to proximity to the rail station.
- Constraints to many future industrial uses and industrial redevelopment

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are:

- . age of the current structure,
- . size,
- . location,
- . limited access to freight, logistics and distribution, and
- . limited potential of lot consolidation.

However:

- . Rezoning will sever the remainder of South Clyde Industrial Precinct into two areas, potentially reducing future industrial land efficiency.
- . Good access to public transport could support higher density employment uses in the future.
- . Currently the South Clyde Industrial Precinct provides some buffer from industrial uses in adjacent precincts.
- . Residential development of the site would present amenity issues for future residents, particularly with 24 hour operations within the Clydeburn Industrial Precinct, containing the rail marshalling yards with 24 hour train maintenance (located adjacent to the site - across Duck Creek).

External Supporting
Notes :

Location and Context

The subject land (10,700 sqm in area) is located within a discrete 'industrial cluster' of IN1 zoned land of 11.69 ha in total area.

- . To the south of the site is the Clyde Railway Station.
- . Duck Creek is situated to the east.
- . Immediately adjacent is the Australian Post Parcel Centre, which operates on a 24 hour per day basis. This is the major international parcel handling centre for Sydney and includes Australian customs and quarantine border protection functions.
- . To the north is existing residential land.
- . Immediately to the north west of the site is a TABcorp contact centre (call centre).
- . To the further east is the Clyde Marshalling Yards which undertake 24 hour rail maintenance. These yards are part of a large employment belt comprising Rosehill, Camellia, Auburn, Rydalmere and Silverwater.
- . The site has the highest employment density of any employment precinct in the Parramatta LGA of 96 persons/ha.

A composite zoning extract and aerial photos (2) are included in 'Documents' identify these features.

Proposed Housing and Targets

Council's report of 22 July 2013 indicates that a proposed development concept for the southern portion of the site may yield 179 dwellings. The northern portion of the site may be dedicated to Council for public housing purposes, comprising a possible 23-28 dwellings.

However, Council considers that it has enough residential zoned land to meet housing targets under the current Metropolitan Plan to 2036 (p.38 MacroPlan, May 2013).

Adequacy Assessment

Statement of the objectives - s55(2)(a)

Is a statement of the objectives provided? Yes

Comment : The key objectives of the planning proposal are to amend the Parramatta Local Environmental Plan 2011 to allow for high density residential development at 2 Factory Street, Granville and to increase the height and floor space ratio controls.

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Explanation of provisions provided - s55(2)(b)

Is an explanation of provisions provided? Yes

Comment : The explanation of provisions clearly outlines the course of action to achieve the intended outcome for 2 Factory Street, Granville:

- change the zoning from IN1 General Industrial to R4 High Density Residential by amending the Land Zoning Map (Sheet LZN_011);
- change the maximum building height from 12m to 16m, 19m and 22m by amending the Height of Buildings Map (Sheet HOB_011) and;
- change the maximum FSR from 1:1 to 1.9:1 by amending the Floor Space Ratio Map Sheet FSR_011).

Justification - s55 (2)(c)

a) Has Council's strategy been agreed to by the Director General? No

b) S.117 directions identified by RPA :

1.1 Business and Industrial Zones

3.1 Residential Zones

* May need the Director General's agreement

3.4 Integrating Land Use and Transport

4.1 Acid Sulfate Soils

4.3 Flood Prone Land

6.3 Site Specific Provisions

7.1 Implementation of the Metropolitan Plan for Sydney 2036

Is the Director General's agreement required? Yes

c) Consistent with Standard Instrument (LEPs) Order 2006 : Yes

d) Which SEPPs have the RPA identified?

SEPP No 32—Urban Consolidation (Redevelopment of Urban Land)

SEPP No 55—Remediation of Land

SEPP No 65—Design Quality of Residential Flat Development

SEPP (Infrastructure) 2007

e) List any other matters that need to be considered :

1.1 Business and Industrial Zones

The proposal seeks to reduce floor space for employment use. The planning proposal is inconsistent with this Direction as it specifies that a draft LEP shall not reduce the potential floor space area for employment uses.

The planning proposal seeks to justify this inconsistency as it is considered that the use of the subject site for industrial purposes is constrained by:

- . its older, degraded building stock;
- . unsuitability of the site due to its relatively small scale and isolated location;
- . limited access to freight, logistics and distribution;
- . physical constraints, which limit expansion or consolidation of lots; and
- . incompatibility with surrounding residential uses.

Further, the planning proposal asserts that the Factory Street employment lands are not strategically critical employment assets and other centres in the LGA and in the Sydney region are more appropriate to concentrate employment growth.

Should the Gateway agree that the planning proposal is to proceed, it will be necessary for the delegate to approve of the inconsistency as a minor matter.

7.1 Implementation of the Metropolitan Plan for Sydney 2036

The planning proposal asserts that it is considered to be consistent with this Direction.

However, it is noted that the Metropolitan Strategy for Sydney 2036 identifies the

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Parramatta LGA as a significant area for employment land and that a long term strategy should prepared to meet employment targets for the LGA (Action E3.2 refers).

In particular, the strategy identifies the issue that many older employment areas are in decline owing to factors such as obsolete building stock and subdivision patterns and the Department will work with councils to identify employment lands in decline and identify constraints on their use through the ELDP and Subregional strategies. Options for renewal will then be established with the relevant subregional strategy.

While it is acknowledged that the 2036 metropolitan strategy is the position of the former government, in terms of the requirements of the direction, the planning proposal is not consistent with the 2036 strategy as it seeks to remove the industrial zone prior to the action(s) specified above being undertaken.

Consequently, should the Gateway agree that the planning proposal is to proceed, it will be necessary for the delegate to approve of the inconsistency as a minor matter.

Have inconsistencies with items a), b) and d) being adequately justified? **No**

If No, explain : This is discussed above and elsewhere in the section on 'Consistency with strategic planning framework'.

Mapping Provided - s55(2)(d)

Is mapping provided? **Yes**

Comment : The maps provided are sufficient in demonstrating the proposed zoning, height and FSR controls.

Community consultation - s55(2)(e)

Has community consultation been proposed? **Yes**

Comment : The planning proposal seeks to provide a community consultation period held for a minimum of 28 days. As it is a major residential development and may generate significant land owner and community interest, 28 days of exhibition is considered necessary.

Additional Director General's requirements

Are there any additional Director General's requirements? **No**

If Yes, reasons :

Overall adequacy of the proposal

Does the proposal meet the adequacy criteria? **Yes**

If No, comment :

Proposal Assessment

Principal LEP:

Due Date :

Comments in relation to Principal LEP : The Parramatta Principal LEP was made in November 2011.

Assessment Criteria

Need for planning proposal : Council officers in liaison with representatives of the land owner conducted an investigation into the subject site and concluded that rezoning the land to R4 High Density

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Residential is more feasible than its current zone: IN1 General Industrial.

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Consistency with strategic planning framework :

The planning proposal addresses the relationship to particular strategic planning frameworks, as follows:

Council's draft Residential Development Strategy:

The aim of the strategy is to provide residential development in areas that can support population growth. The subject site is located within close proximity to public transport and close to community facilities and shops.

Draft Metropolitan Strategy for Sydney 2031

The planning proposal states the site is constrained (for various reasons - see pp.6/7 of the proposal), it holds limited access, is incompatible with surrounding land uses and concludes that the subject site is not considered strategically important in Parramatta Council's strategies.

The draft metropolitan strategy (p.48) states:

'Existing industrial land, especially in established areas, are under pressure to be rezoned to other uses, despite the clear need for them in the future. Latest data also reveals a noticeable increase in rezoning of employment lands to non-industrial and wider employment uses. In 2011, 415 hectares were rezoned in Sydney across areas such as Liverpool, Parramatta, Marrickville and Auburn.

To provide a framework to assess proposals to rezone industrial land, an assessment checklist has been developed (Criteria Table 1, page 49) in consultation with key stakeholders on the NSW Government's Employment Lands Task Force.

Industrial lands provide the space enterprises and activities need to operate economically without being restricted by sensitive land uses. Providing a relatively unconstrained operating environment is more important than the number of jobs on a specific site. It has the potential to attract infrastructure and other industrial uses and activities to enhance freight and logistics efficiencies and allow for expansion'.

Policy 'e' of the draft strategy states: 'Proposals to rezone existing industrial lands must be consistent with the Industrial Lands Strategic Assessment Checklist (Criteria Table 1, page 49).

Regional Team's Comments:

- . The planning proposal has not addressed the six items within the checklist, however, these items are addressed in detail in the supporting paper: 'Industrial Land Rezoning Economic Justification' (pp. 36 to 38 - see 'documents').
- . While the assessment provided in the checklist is reasonable and generally substantiated, it is undertaken from a broader overview of industrial trends and does not recognise that:
 - . contrary to the advice provided in the checklist, the cluster has been identified as significant within the draft West Central subregional strategy (see below), which is supported by Council's recent draft Employment Lands Study (see below).
 - . maintaining the present zone of the site may significantly contribute to the existing industrial cluster by retaining a continuous industrial zone, and compatible land uses, within the cluster, and
 - . whether opportunities may exist to redevelop the land to support new forms of industrial land uses, such as high-tech or creative industries.

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Parramatta 2038 Community Strategic Plan

The strategic plan identifies the key challenges and opportunities to guide future development, including the economic vitality of Parramatta, redevelopment of large properties and the availability of residential uses within close proximity to public transport.

The proposed amendments in the planning proposal are not inconsistent with the challenges and opportunities identified in the community strategic plan.

Other Matters:

Draft Parramatta Employment Lands Study*

Council has not considered (nor adopted) its draft employment lands study at this time. However it is noted:

- . the draft study identifies Factory Street as having the highest employment density of any employment precinct in Parramatta, at 96 persons per hectare;
- . the draft study recommends retaining IN1 General Industrial zoned land in the South Clyde Industrial Precinct for a number of reasons, including its support for a range of industrial and warehousing uses, including some that support the adjacent Clydeburn Industrial Precinct (Marshalling Yards), and
- . acknowledges that close proximity to transport infrastructure would support high density residential development.

In summary, the planning proposal seeks to rezone the subject site as it is not considered significant in meeting employment targets for Parramatta, while the draft study asserts that any potential redevelopment would diminish the precinct's effectiveness as an efficient employment land.

In addition the study indicates that residential development would raise significant amenity issues, e.g. noise from train services, noise from all-hour train maintenance work and related flood-lighting.

Further, retention of an employment zone would ensure future general industrial use employment lands stock for the LGA are maintained and will provide 'insurance' that the precinct can continue to grow and cater for industrial uses, as well as supporting the existing structure and use of the precinct.

* Note: Council officers have advised that 'council is awaiting the final study from consultants. Staff are yet to determine if and when the study and its recommendations would be put to council.'

West Central Subregion - Draft Subregional Strategy

While subject to further and contemporary consideration following adoption of the forthcoming metropolitan strategy, it is noteworthy that the precinct is identified within the 2007 draft West Central Subregional Strategy as 'Category 1 - Land to be retained for industrial purposes'.

Within that draft subregional strategy the land is described as:

'...this employment lands precinct features very large floor plate transport and logistics uses including a large Australia Post and Customs Clearing House. Although not directly linked to the rail marshalling yards on the opposite bank of Duck River, the precinct does form part of a very large employment belt comprising Rosehill, Camellia, Auburn, Rydalmere and Silverwater. The building stock is relatively new and of good design. It is therefore highly likely the sites here have a long lifespan and should not be subject to residential development pressure in the period to 2031'.

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Environmental social
economic impacts :

Environmental Impacts:

Flood Assessment

The Preliminary Flooding Assessment report states that 2 Factory Street, Granville is not subject to 1 in 20 or 1 in 100 flooding.

Acid Sulphate Soil Assessment

It has been concluded that there are signs of potential acid sulfate soils at the site. The site will require treatment prior to development.

Site Contamination

A study indicates the presence of chemical contamination, however, it concluded residential development is suitable, subject to remediation.

Flying-fox Colony

Adequately addressed in the planning proposal.

It is considered that environmental impacts have been adequately addressed.

Social Impacts:

Given:

- . the possible amenity impacts upon future residents (i.e. 24 hour operations of the postal centre and train maintenance depot), and
- . the ability of the future occupants of the proposed residential development to raise issues with the continued operation of the employment activities, thereby possibly limiting and disrupting these significant works,

It is considered that the planning proposal has not fully addressed social impacts.

Economic Impacts:

It is acknowledged that the proposal will provide both private (and possibly public housing) and will contribute to the local economy in this regard.

However, it is also acknowledged that rezoning may also have a negative impact on the wider economy by interfering with an employment precinct that is currently operating successfully as evidenced by the precinct currently holding an employment density of 96 persons/ha.

In summary, it is considered that the planning proposal does not fully address the social and economic impacts should the site be redeveloped for residential purposes.

Assessment Process

Proposal type :	Precinct	Community Consultation Period :	28 Days
Timeframe to make LEP :	12 months	Delegation :	RPA
Public Authority Consultation - 56(2) (d) :			

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Is Public Hearing by the PAC required? **No**

(2)(a) Should the matter proceed ? **No**

If no, provide reasons :

Resubmission - s56(2)(b) : **No**

If Yes, reasons :

Identify any additional studies, if required. :

Other - provide details below

If Other, provide reasons :

Prior to exhibition:

- . a study is to be undertaken, and is to form part of the exhibition, which will identify and address light intrusion from the surrounding industrial area, including the Clyde Marshalling Yards.
- . the supporting acoustic study be amended to include consideration of potential noise impacts on the site from other industrial uses in proximity to the site, including the Clyde Marshalling Yards and this amended study be placed on exhibition.
- . consideration be given in both studies (above) to the manner in which the proposed residential development will be adequately buffered from adjoining industrial uses so as not to affect the operations of these existing industrial uses.

Identify any internal consultations, if required :

Employment Lands (ELDP)

Is the provision and funding of state infrastructure relevant to this plan? **No**

If Yes, reasons :

Documents

Document File Name	DocumentType Name	Is Public
Aerial photo - Clyde Yards - Tag 'C'.pdf	Photograph	Yes
Aerial photo - Location and surrounds - tag 'B'.pdf	Photograph	Yes
Zoning extract - Tag 'A'.pdf	Drawing	Yes
Acid Sulphate Soil Assessment.pdf	Study	Yes
Phase 2 Environmental Site Assessment.pdf	Study	Yes
Planning Proposal.pdf	Proposal	Yes
Traffic and Parking Assessment.pdf	Study	Yes
Urban design analysis.pdf	Study	Yes
Acoustic Logic - Amenity Assessment Report.pdf	Study	Yes
Assessment of Grey-headed flying-fox colony.pdf	Study	Yes
Cover Letter.pdf	Proposal Covering Letter	Yes
Economic Justification.pdf	Study	Yes
Flood Assessment.pdf	Study	Yes
Industrial Land Use Survey.pdf	Study	Yes

Planning Team Recommendation

Preparation of the planning proposal supported at this stage : **Not Recommended**

S.117 directions: **1.1 Business and Industrial Zones**
 3.1 Residential Zones
 3.4 Integrating Land Use and Transport

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- 4.1 Acid Sulfate Soils
- 4.3 Flood Prone Land
- 6.3 Site Specific Provisions
- 7.1 Implementation of the Metropolitan Plan for Sydney 2036

Additional Information : It is recommended that the matter does not proceed.

The reasons supporting the recommendation - not to proceed - are provided under the heading 'supporting reasons' (following).

However, should the Gateway determine that the proposal is to proceed, it is recommended:

- . that the Director General's delegate forms the view that the inconsistency with section 117 directions: 1.1 and 7.1 are justified as minor matters, and
- . the following conditions apply:

1. Prior to exhibition:

- . a study is to be undertaken, and is to form part of the exhibition, which will identify and address light intrusion from the surrounding industrial area, including the Clyde Marshalling Yards.
- . the supporting acoustic study be amended to include consideration of potential noise impacts on the site from other industrial uses in proximity to the site, including the Clyde Marshalling Yards and this amended study be placed on exhibition.
- . consideration be given in both studies (above) to the manner in which the proposed residential development will be adequately buffered from adjoining industrial uses so as not to affect the operations of these existing industrial uses.
- . The checklist in the supporting study ('Industrial Land Rezoning - Economic Justification - May 2013') be amended to reflect that the precinct is recognised in the current draft west central subregional strategy, and that the study be further amended to adequately consider:
 - . whether retention of the present zone of the site would significantly contribute to the existing industrial cluster by retaining a continuous industrial zone, and compatible land uses, within the cluster, and
 - . whether opportunities may exist to redevelop the land to support new forms of industrial land uses, such as high-tech or creative industries.

2. The Planning Proposal is to be exhibited for 28 days;

3. Consultation is required with the following public authorities under section 56(2)(d) of the EP&A Act:

- Australia Post,
- Australian Customs Service,
- Australian Quarantine Inspection Service,
- Transport for NSW,
- Roads and Maritime Service,
- Department of Education and Training,
- RailCorp,
- Origin Energy.
- Sydney Water,
- Auburn Council.

4. A public hearing is not required to be held into the matter by any person or body under section 56(2)(e) of the EP&A Act;

5. The timeframe for completing the LEP is to be 9 months from the week following the date of the Gateway Determination.

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Further, should the Gateway determine that the proposal is to proceed, it is recommended that delegation be given to Parramatta Council to exercise the Minister's plan making powers.

Supporting Reasons : It is recommended that the proposal does not proceed for the following reasons:

Amenity

- . For amenity reasons, the subject site is not considered entirely suitable for residential use at this time given its location immediately adjacent to existing industrial uses (including 24 hour operation of the Australian Post facility) and its close proximity to the rail maintenance facility (i.e. the marshalling yards) with its 24 hour operation and associated flood lighting.
- . In particular, as the precinct currently offers a buffer to surrounding residential uses from the marshalling yards, locating residential development on this site without this buffer may be highly detrimental to the 'liveability' of such a development.

Efficiency of the Precinct

- . Rezoning will sever the existing industrial zoned land and may diminish the precincts efficiency.

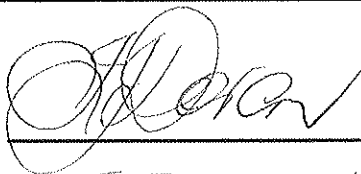
Impacts on the viability of industrial uses

- . The subject site is 1.07 hectares in area and accounts for only 0.18% of the existing employment land in the Parramatta LGA, and is therefore not considered to be significant in this regard. However, the site does form part of a larger precinct of 11.8 hectares that is particularly significant in terms of employment numbers, i.e. the precinct has the highest employment density of any employment precinct in Parramatta at 96 persons/ha. This desirable situation may well be threatened by introducing a residential land use that would be incompatible with the 24 hour operation of a significant employer (i.e. the Australian Postal facility) and possibly with the train maintenance operations within the marshalling yards, placing possible impediments (through complaints) to the continued operation of both activities.

Precedent

- . Rezoning for residential purposes at this location may encourage further residential rezoning on a piecemeal fashion in this location without the benefit of reviewing the situation in an orderly and strategic manner. This may lead to the removal of a relatively unconstrained and successful operating environment over time.

Signature:



Printed Name:

T DORAN

Date:

30/8/13