



Planning,
Industry &
Environment

IRF20/5501

Gateway determination report – PP-2020-3702

Planning proposal for 2 Railway Street and 3-7 East Street, Lidcombe (additional 115 dwellings and 48 jobs)

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Contents

1	Planning Proposal	2
1.1	Overview and objectives of planning proposal	2
1.2	Explanation of provisions	3
1.3	Site description and surrounding area.....	4
1.4	Mapping.....	5
2	Need for the planning proposal	9
3	Strategic assessment	9
3.1	District Plan	9
3.2	Local.....	11
3.3	Local planning panel (LPP) recommendation.....	12
3.4	Section 9.1 Ministerial Directions	13
3.5	State environmental planning policies (SEPPs)	14
4	Site-specific assessment	14
4.1	Environmental.....	14
4.2	Social and economic.....	15
4.3	Infrastructure	16
5	Consultation.....	16
5.1	Community	16
5.2	Agencies.....	16
6	Timeframe	16
7	Local plan-making authority	17
8	Assessment Summary.....	17
9	Recommendation.....	17

Table 1 Reports and plans supporting the proposal

Relevant reports and plans
Attachment D – Request to re-submit planning proposal (August 2019)
Attachment E – CIHAP report and minute (May 2017)
Attachment F – Council report and minute (June 2017)
Attachment G - Traffic Management Plan (Jan 2018)
Attachment H - Economic Impact Assessment (Dec 2017)

1 Planning Proposal

1.1 Overview and objectives of planning proposal

Table 2 Planning proposal details

LGA	Cumberland
PPA	Cumberland Council
NAME	Planning proposal for 2 Railway Street and 3-7 East Street, Lidcombe (additional 115 dwellings and 48 jobs)
NUMBER	PP-2020-3702
LEP TO BE AMENDED	Auburn Local Environmental Plan 2010
ADDRESS	2 Railway Street and 3-7 East Street, Lidcombe
DESCRIPTION	Lot 4 DP373141, Lot 3 DP373141, Lot 2 DP373141
RECEIVED	19/11/2019
FILE NO.	IRF20/5501
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal

The planning proposal contains objectives and intended outcomes that adequately explain the intent of the proposal.

The objectives of the planning proposal are to:

- enable a mixed-use development on site, which could potentially provide 115 dwellings and 60 jobs (approximately 1,505m² of retail / commercial floor space); and
- identify land reservation at the corner of Railway and East Streets (the north-east corner of the site) for a proposed road intersection upgrade for a roundabout. The concept design of the road upgrade is shown in **Attachment C** of the planning proposal.

The planning proposal notes the potential for a Voluntary Planning Agreement between Council and the proponent with regard to the RE1 Public Recreation zoned land which forms part of the subject site. The planning proposal does not seek any changes relating to the RE1 land.

Background

In August 2019, the Department wrote to Council in response to a previous version of the planning proposal (PP_2018_CUMBE_003_00) (**Attachment D**). The Department requested Council re-submit the planning proposal following further investigation into the need for the proposal and the inconsistency with the Greater Sydney Regional Plan and Central City District Plan. It was identified that the previous proposal would lead to the loss of industrial land and did not address the review-and-manage approach to industrial lands as outlined in the District Plan.

Council re-submitted an amended planning proposal for the site, which is the subject of this Gateway determination request. Council amended the proposal by adding a minimum non-residential FSR control of 0.4:1 to the site and an additional provision that restricts residential development from the first two floors. This was in response to the Department's request that the proposal should provide higher-order employment opportunities and address the industrial lands objectives and actions in the Regional Plan and District Plan.

The Department notes the amended proposal does not adequately respond to the issues previously raised relating to the loss of employment land. Therefore, the issues remain outstanding and are discussed in this report.

The proponent has been provided with the opportunity to withdraw the planning proposal however has confirmed they seek a Gateway determination.

1.2 Explanation of provisions

The planning proposal seeks to amend the Auburn LEP 2010 per the changes below:

Table 3 Current and proposed controls

Control	Current	Proposed
Zone	IN2 Light Industrial RE1 Public Recreation	B4 Mixed Use RE1 Public Recreation (no change)
Maximum height of building	No height allocated	32m (proposed B4 land)
Floor space ratio	1.0:1 (IN2 land)	Maximum 3.5:1 and a minimum 0.4:1 for non-residential (proposed B4 land)
Number of dwellings	0	115
Number of jobs	12	60
Land Reservation Acquisition	Local Open Space (RE1)	Local Open Space (RE1) (no change) Local Road (B4) – for land at the corner of Railway Street and East Street.
Additional clause under Part 6 Additional local provisions	N/A	Clause 6.12 Development on certain land. This new clause proposes to restrict residential accommodation on the ground and first floors on the site. The aim of this clause is to ensure employment activities will be located on the ground floor.

The planning proposal contains an explanation of provisions that adequately explains how the objectives of the proposal will be achieved.

1.3 Site description and surrounding area

The subject site is 2,685m² and is zoned for light industrial uses. The site is occupied by a memorial/stonemason business and Automation Feeding Devices Pty Ltd, which is the landowner and proponent of the planning proposal. The current businesses on the site provide 12 jobs in the local area.

The southern portion of the site is zoned RE1 Public Recreation (within the land description of 5-7 East Street, fronting Davey and East Streets) and while it does form part of the subject land within the planning proposal, there are no intended changes to the development controls and standards for this portion of the site (**Figure 1**). The land is zoned to provide open space and an expansion to the adjacent Friends Park and Jewish Reserve and is identified for land acquisition. This land is used for car parking associated with the industrial uses. This part of the site will retain the RE1 zoning and identified land acquisition.



Figure 1 Subject site (source: Nearmap)

The subject site is located outside of the Lidcombe town centre boundary immediately east of the centre. The town centre is predominantly zoned B4 Mixed Use (**Figure 3**), with a maximum building height of 32m, being the same building height proposed for the subject site. A development application for a 12-storey mixed use development, comprising basement car parking, commercial and residential uses, located south-west of the site at 9-15 Raphael Street, Lidcombe is currently being assessed by Council.

To the south, the site forms part of a cluster of IN2 Light Industrial zoned land along East Street, comprising of one to two-storey industrial buildings. To the east of the site is Rookwood Cemetery, which is state heritage listed. Immediately north of the site is the T1 train line and the locally significant heritage item, the Lidcombe Signal Box. Lidcombe Station is 280m from the site, which provides connections to the Parramatta and Sydney CBDs (**Figure 2**).



Figure 2 Site context (source: Nearmap)

1.4 Mapping

The planning proposal includes mapping showing the proposed changes to the Auburn LEP 2010 maps.

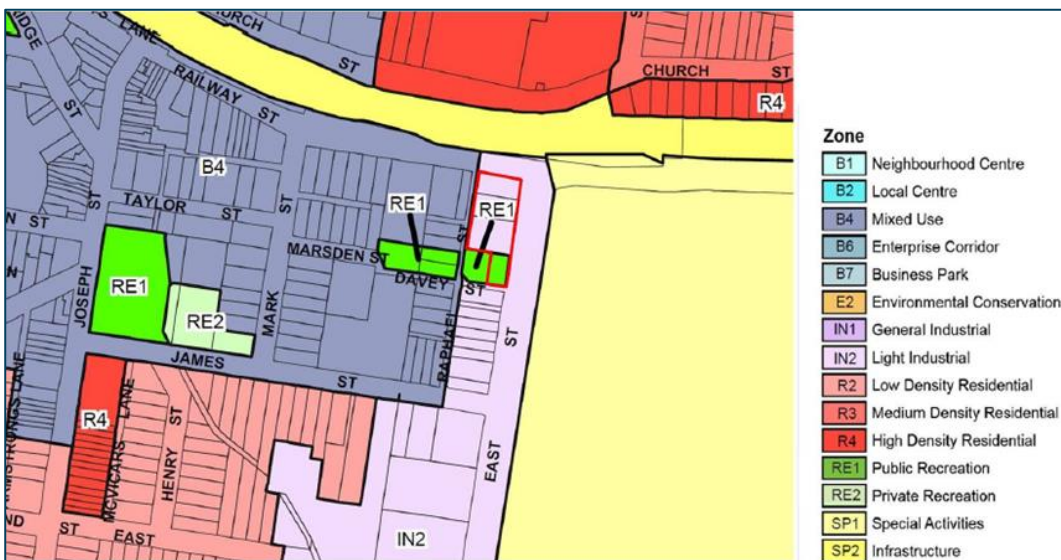


Figure 3 Current zoning map

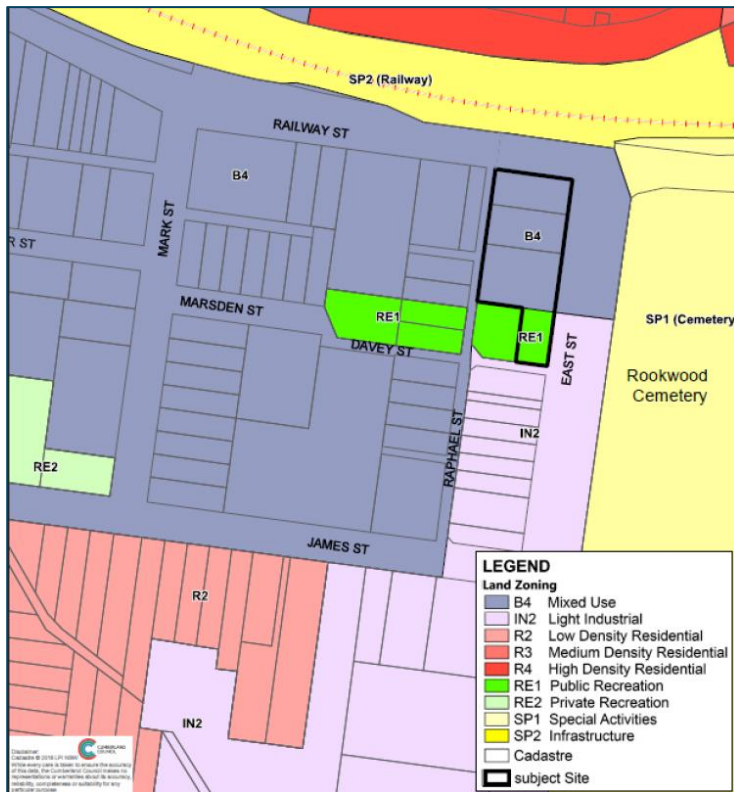


Figure 4 Proposed zoning map

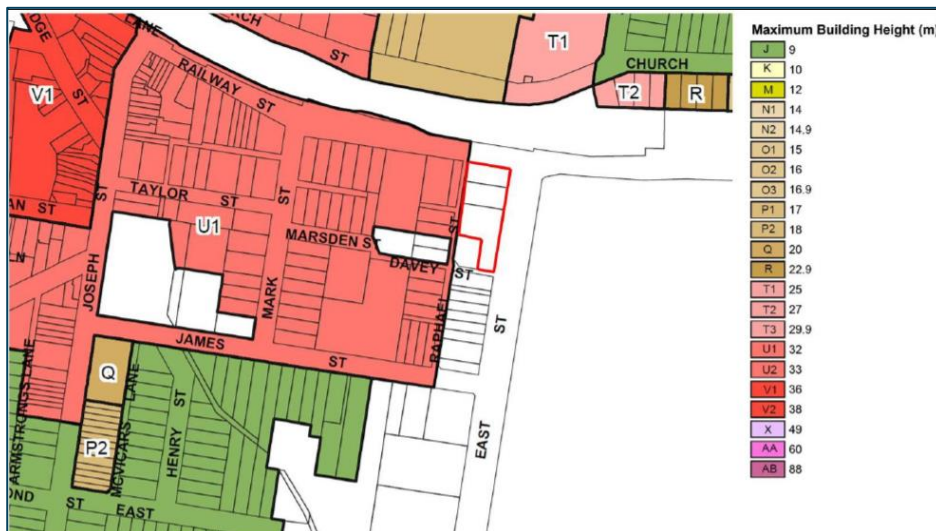


Figure 5 Current height of building map



Figure 6 Proposed height of building map

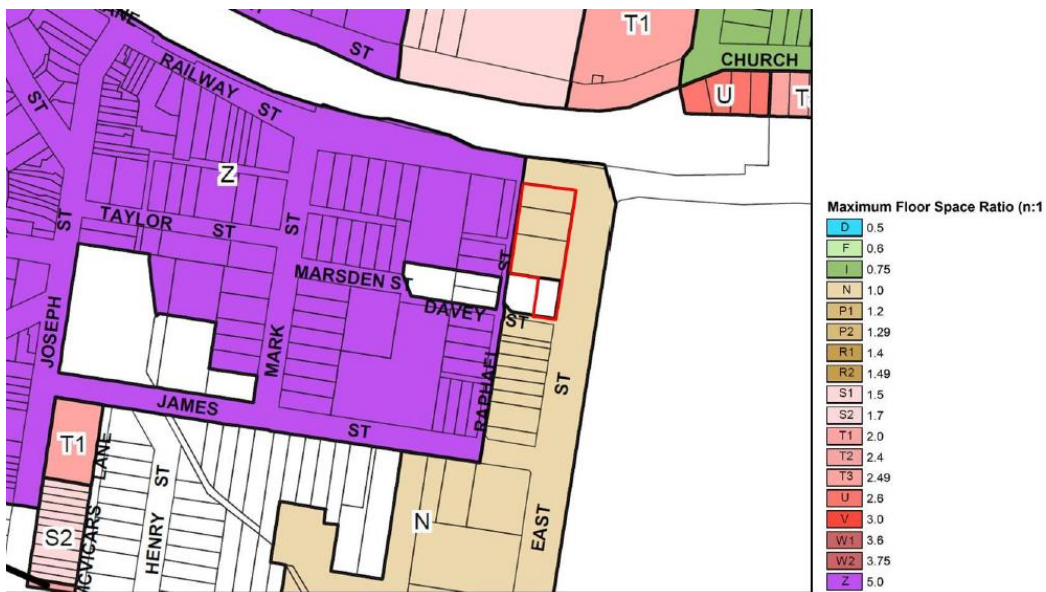


Figure 7 Current floor space ratio map

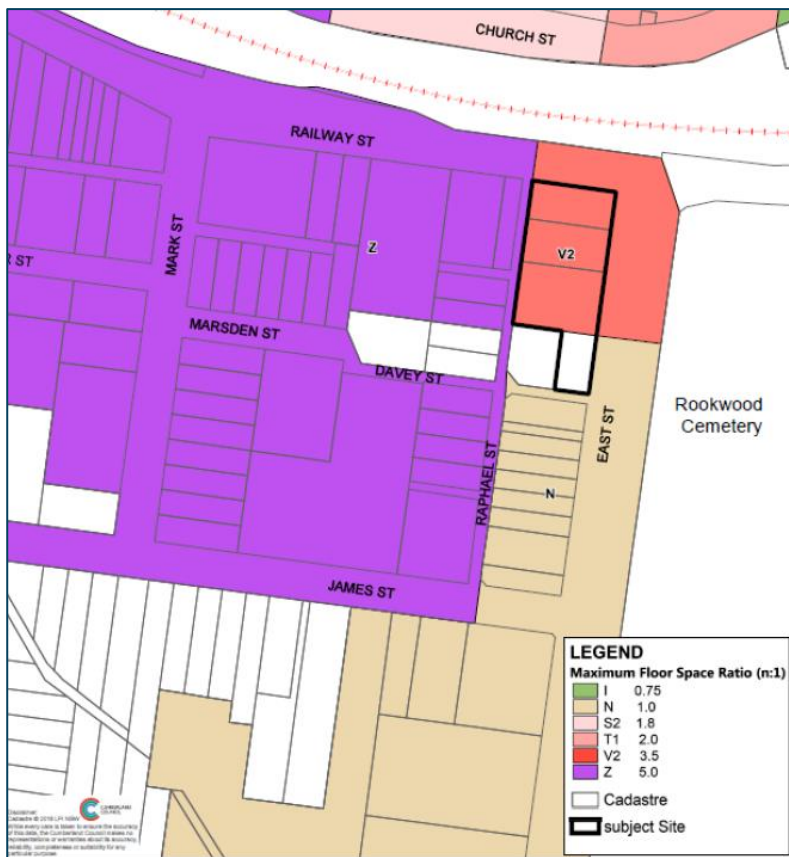


Figure 8 Proposed floor space ratio map

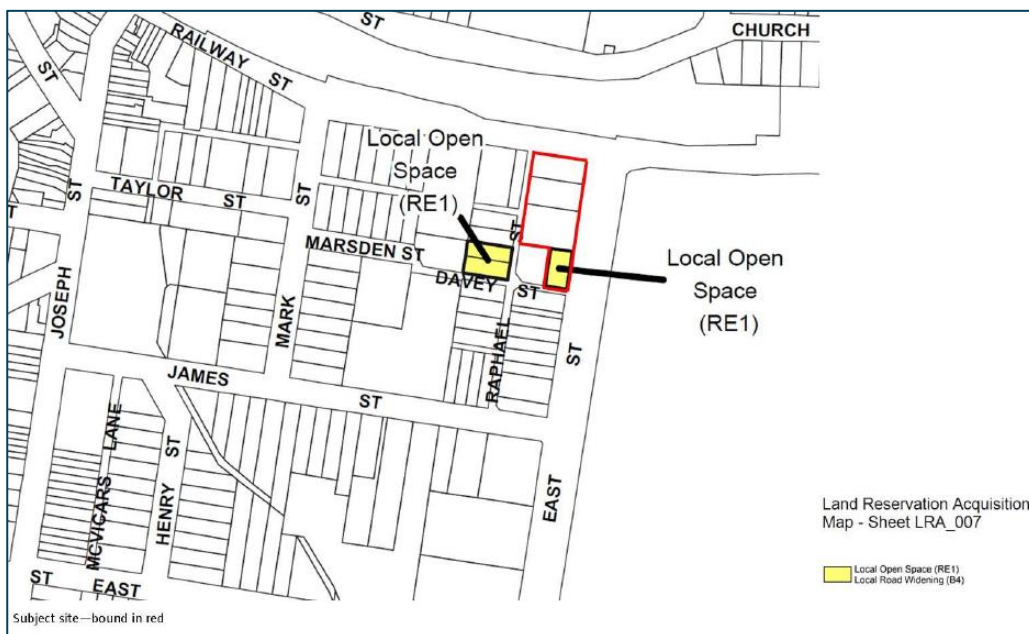


Figure 9 Current land reservation acquisition map

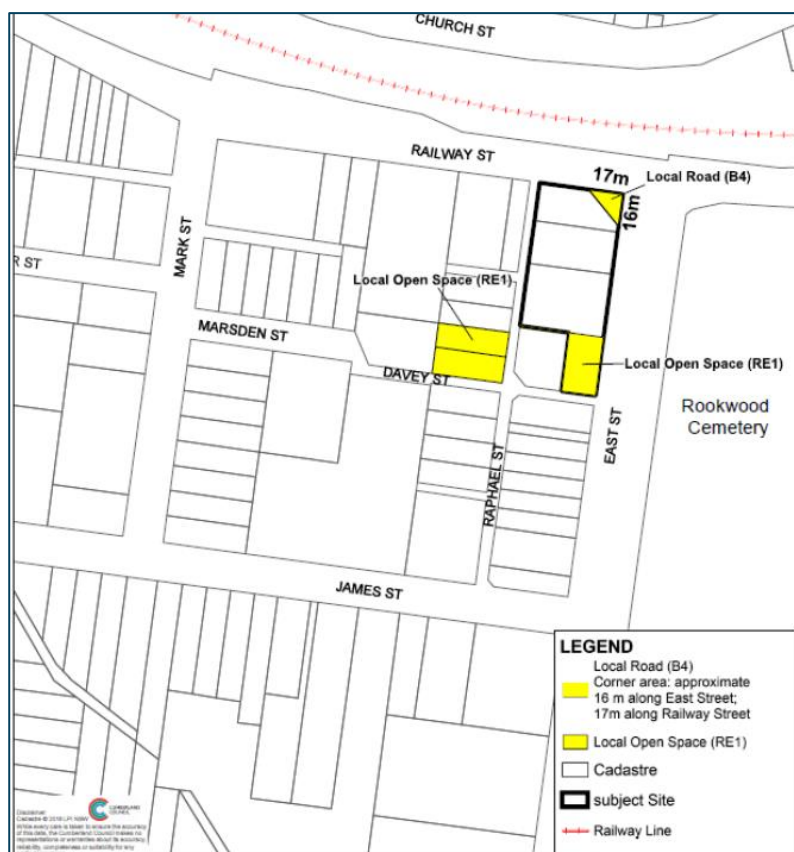


Figure 10 Proposed land reservation acquisition map

2 Need for the planning proposal

The planning proposal is in response to the landowner's request to rezone the site and is not the result of any site-specific study or report. The site is zoned IN2 Light Industrial and the proposed redevelopment of the site for a mixed-use residential and commercial/retail development is not permissible under the Auburn LEP 2010. To achieve the proposal's objectives, a planning proposal is required to amend the land zoning, height, FSR and required land acquisition to enable the anticipated redevelopment of the site.

The planning proposal is not recommended to proceed primarily due to its inconsistency with the Central City District Plan and section 9.1 Direction 1.1 Business and Industrial Zones as discussed in this report.

3 Strategic assessment

3.1 District Plan

The site is within the Central City District. The Greater Sydney Commission (GSC) released the Central City District Plan on 18 March 2018. The plan contains planning priorities and actions to guide the growth of the district while improving its social, economic and environmental assets.

The planning proposal is not consistent with the plan as outlined in Table 4.

The Department is not satisfied the planning proposal gives effect to the District Plan in accordance with section 3.8 of the *Environmental Planning and Assessment Act 1979*. The following table includes an assessment of the planning proposal against relevant priorities and actions.

Table 4 District Plan assessment

District Plan Priorities	Justification
C11 Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land	<p>The proposal is considered inconsistent with this planning priority as it seeks to rezone land from IN2 Light Industrial to B4 Mixed Use which will enable residential and commercial development and lead to a loss of industrial and employment generating land. Action 49 is relevant for the site, which states:</p> <p><i>Action 49: Review and manage industrial and urban service land, in line with the principles for managing industrial and urban services land, in the identified local government areas (refer to Figure 20) by undertaking a review of all industrial lands to confirm their retention or transition to higher order uses (such as business parks) and prepare appropriate controls to maximise business and employment outcomes, considering the changing nature of industries in the area.</i></p> <p>The planning proposal acknowledges the inconsistency with Action 49. However, Council considers there is strategic merit in the proposed rezoning for the following reasons:</p> <ul style="list-style-type: none"> • Lidcombe town centre is not identified as a key employment or strategic centre where land needs to be protected from residential development to ensure employment targets are achieved. • The growth, revitalisation and success of Lidcombe town centre is contingent on the growth in population that will come from mixed use residential redevelopment. • Although there is no strategic plan that supports the expansion of the town centre, Council considers the proposal represents a natural extension of the town centre. <p><u>Referral to the Greater Sydney Commission</u></p> <p>The amended proposal was informally referred to the GSC to obtain further insight in relation to the proposal's consistency with the District Plan. GSC advised the planning proposal does not give effect to the District Plan and should not proceed to Gateway. A summary of the advice is provided below:</p> <ul style="list-style-type: none"> • A holistic analysis of all industrial and urban services land in the LGA is needed to assess what potential the site and other industrial zoned lands have for provision of new higher order and knowledge-based employment uses as well as the mechanisms to achieve that transition. • Rezoning the site to permit residential uses is likely to set an expectation for rezoning of other industrial zoned land to the south of the site. • The potential for more jobs on site is not sufficient justification for changing the zoning, but rather the type of jobs that can be achieved to support the future direction for the LGA. • The proposed B4 zone is likely to deliver some minor retail activity on the ground floor and some commercial office suites at first floor with the predominant use being the residential apartments above first floor. This is not consistent with the intent of the review and manage approach under the District Plan.

Department comment

The Department notes that the site is adjacent to the Lidcombe town centre boundary. The site forms part of a cluster of light industrial lands along East Street. Lidcombe is identified in the plan as an area for Council to review and manage industrial lands. The proposal has not adequately addressed action 49 of the plan, with the first principle of keeping the employment value of the land and then reviewing how the industrial precinct might evolve to provide additional employment purposes.

Concern is raised about the proposal's unknown overall impact of the loss of industrial land in the LGA and potential expectation for rezoning industrial land south of the site to enable residential and commercial uses. It is noted that the planning proposal does not include an investigation of alternative employment-generating uses that are consistent with the existing zoning. The proposal does not provide sufficient strategic merit and remains inconsistent with this priority.

3.2 Local

The proposal's consistency with the following local plans and endorsed strategies is assessed below. It is noted that the proposal is inconsistent with Council's Local Strategic Planning Statement.

Table 5 Local strategic planning assessment

Local Strategies	Justification
Local Strategic Planning Statement (LSPS) 2020	<p>The proposal was lodged prior to the adoption of Council's LSPS in February 2020.</p> <p>The site is located within Lidcombe principal local centre where three large employment generating precincts are identified, with a range of industrial, education and health facilities. Although the site is mapped as an existing industrial area, it is identified in a medium to high density housing opportunity area for investigation as it is within 800m of Lidcombe station.</p> <p>In giving effect to the District Plan, the LSPS responds to retaining and managing industrial lands, primarily for employment uses. It acknowledges the importance of industrial and employment lands in providing jobs and supporting a diverse local economy. The LSPS supports the retention of industrial lands to provide locational opportunities for growth in new industries, such as digital innovation, media, the arts, creative, food and beverage manufacturing, allied health, research and development and advanced technology manufacturing.</p> <p>Given the above, the planning proposal will enable residential and retail uses, which is considered to be inconsistent with the LSPS's approach to retaining and managing industrial land within the LGA.</p>

Cumberland Employment and Innovation Lands Strategy 2019	<p>In May 2019, Council adopted the Cumberland Employment and Innovation Lands Strategy, which aligns with the work of the Greater Sydney Commission and the Central City District Plan by maintaining existing employment and innovation lands in Cumberland. The Strategy provides a strategic framework to transition to high-order and knowledge-based industries that can support growth and maximise opportunities for the Cumberland LGA.</p> <p>It is noted that the site and surrounding IN2 land to the south have not been considered in the Strategy. Therefore, the site has not been assessed to determine its employment value to the District or status as a local or metropolitan serving industrial area. Until an assessment can be undertaken by Council which considers the principles for managing industrial and urban services land outlined in the District Plan, it is not appropriate to rezone the site to B4 Mixed Use.</p>
Cumberland Local Housing Strategy (LHS) 2020	<p>The proposal was lodged prior to the adoption of Council's LHS in June 2020. It is noted that the Department has not yet endorsed the LHS.</p> <p>The LHS aligns with the Central City District Plan and Council's Local Strategic Planning Statement. The LHS identifies the site being located within Lidcombe principal local centre, providing for 30-minute access to a Strategic Centre and services and facilities to meet the needs of the broader local community.</p> <p>Notwithstanding, section 2.4 of the LHS identifies a range of land use opportunities and constraints were examined to identify potential locations for future housing across the LGA. The subject site is not mapped for housing opportunity and therefore the proposal does not align with the LHS.</p>
Cumberland Community Strategic Plan 2017-27	<p>The proposal states it is consistent with Council's community strategic plan, having regard to the plan's five strategic goals: a great place to live; a safe accessible community; a clean and green community; a strong local community; and a resilient built community.</p>
Draft Cumberland Local Environmental Plan (CLEP)	<p>The site's zoning is proposed to remain as IN2 Light Industrial under the draft CLEP, which is in finalisation stage with the Department. The proposed IN2 zone seeks to prohibit residential accommodation and commercial premises, which includes business, office and retail premises. It is noted under the current IN2 zone under Auburn LEP 2010, business premises are not prohibited. The proposal does not contain a discussion on the inconsistency with the draft CLEP.</p>
Draft Auburn and Lidcombe Town Centres Strategy (2016)	<p>The draft Auburn and Lidcombe Town Centres Strategy (Strategy) was prepared in 2016 in recognition of the development that had been occurring in the centres, but that development had not provided the desired aesthetic or functional outcomes. The subject site is outside of the Lidcombe town centre and as such no proposed changes to planning controls were investigated nor the site's potential value to the town centre vision.</p>

3.3 Local planning panel (LPP) recommendation

The previous version of the planning proposal request was submitted to Council prior to the establishment of the Cumberland Local Planning Panel in March 2018.

In May 2017, the planning proposal request was referred to the Cumberland Independent Hearing and Assessment Panel, which sought to rezone the site from IN2 Light Industrial to B4 Mixed Use, apply a maximum FSR of 5:1 (excluding the RE1 zoned land) and maximum building height of 32m. The panel requested an economic impact assessment, a further overshadowing study, and a

traffic management plan for the East / Railways Street intersection and that the proposed FSR be amended to 3.5:1 to respond to a transition of buildings towards the eastern edge of the Lidcombe town centre towards Rookwood Cemetery (**Attachment E**).

In June 2017, Council resolved to make changes to the initial proposal and decided to progress the proposal (**Attachment F**).

3.4 Section 9.1 Ministerial Directions

The planning proposal is inconsistent with relevant section 9.1 Direction discussed below:

Table 6 9.1 Ministerial Direction assessment

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
<p><i>1.1 Business and Industrial Zones</i></p> <p>The objectives of this direction are to:</p> <ul style="list-style-type: none"> • Encourage employment growth in suitable locations, • Protect employment land in business and industrial zones, and • Support the viability of identified centres. 	No	<p>This Direction applies as the proposal rezones employment land to B4 Mixed Use. The proposal is inconsistent with this Direction as it intends to rezone the site from industrial uses to facilitate a predominantly residential development, which leads to a loss of potential floor space for industrial uses.</p> <p>The subject site comprises two light industrial businesses. The proposal seeks to increase the employment density on the site from 12 persons (light industrial employment) to 60 persons (commercial/retail employment). Although the proposal will provide a higher density of jobs, those jobs may be retail/commercial related, not light industrial related or higher-order employment.</p> <p>The proposal also has the potential to encourage further spot rezoning of industrial land in Lidcombe, specifically land south of the site along East Street.</p> <p>Additionally, there has been no investigation into encouraging commercial/retail employment in an alternative location where a zoning permits such land uses.</p> <p>The proposed rezoning has not been adequately justified. It is recommended that the Secretary's delegate note that the proposal's inconsistency with this Direction remains unresolved.</p>

<p>4.1 Acid Sulfate Soils</p> <p>The objective of this direction is to avoid significant adverse environmental impacts from the use of land that has a probability of containing acid sulfate soils (ASS).</p>	Consistent	<p>This Direction applies as the site is identified as Class 5 ASS under Auburn LEP 2010. The proposal is inconsistent with this Direction as no assessment of the ASS has been undertaken to establish if an ASS management plan would be required to support the proposed future redevelopment of the site.</p> <p>It is recommended that the Secretary's delegate agree that the proposal's inconsistency with this Direction is justified.</p>
<p>6.2 Reserving Land for Public Purposes</p> <p>The objectives of this direction are to:</p> <ul style="list-style-type: none"> to facilitate the provision of public services and facilities by reserving land for public purposes, and to facilitate the removal of reservations of land for public purposes where the land is no longer required for acquisition. 	No	<p>This Direction applies as the proposal seeks to identify the site on the land reservation map without rezoning the land and therefore requires approval of the Secretary under the Direction.</p> <p>The proposed reservation on the corner of East and Railway Streets is required to enable Council to acquire the land for traffic movement through a voluntary planning agreement.</p> <p>The proposal is recommended to not proceed due to lack of strategic merit and therefore the inconsistency with this Direction remains unresolved.</p>
<p>6.3 Site Specific Provisions</p> <p>The objective of this direction is to discourage unnecessarily restrictive site specific planning controls</p>	No	<p>This Direction applies as the proposal seeks to restrict residential accommodation on the ground and first floors on the site. The aim of this clause is to ensure employment activities will be located on the ground floor. While the proposal seeks to allow employment activities on the ground and first floors, it does not maintain the industrial use or review its potential to higher-order employment lands under the review and manage principles.</p> <p>The proposal is recommended to not proceed due to lack of strategic merit. The proponent has not provided justification for this Direction and therefore the inconsistency remains unresolved.</p>

3.5 State environmental planning policies (SEPPs)

The planning proposal is consistent with all relevant SEPPs.

4 Site-specific assessment

4.1 Environmental

The following table provides an assessment of the potential environmental impacts associated with the proposal.

Table 7 Environmental impact assessment

Environmental Impact	Assessment
Environmental	The proposal is not anticipated to have an adverse impact on the natural environment. The site is within an established urban environment and it is not identified as containing critical habitat or threatened species, populations or ecological communities.
Traffic	The proposal includes a traffic management plan (TMP) (Attachment G). The TMP is to the satisfaction of Council's engineers regarding the local road network and subsequent maintenance/road improvements covered by Council's section 7.11 contributions plan and related contributions by any redevelopment of the site.
Scale and heritage	The neighbouring B4 Mixed Use zone west of the subject site has a maximum building height of 32m. The subject site's proposed building height of 32m would be consistent with the adjoining height west of the site but could potentially raise concerns regarding the impact on Rookwood Cemetery to the east (State heritage listed).

4.2 Social and economic

The following table provides an assessment of the potential social and economic impacts associated with the proposal.

Table 8 Social and economic impact assessment

Social and Economic Impact	Assessment
Social	It is acknowledged that the proposal would potentially enable more housing and commercial and retail employment opportunities within walking distance of Lidcombe town centre and Lidcombe station. However, the potential of the proposal to set an expectation for rezoning further employment lands in the area could, over time, erode a variety of job opportunities for residents in the greater locality.

Economic	<p>The proposal includes an economic impact assessment (Attachment H), which focuses on the potential economic impacts on existing businesses in the Lidcombe Town Centre. The assessment concludes that the proposal will have positive impacts and incorporates only 1,505m² of commercial and retail floorspace, which is small in scale when compared to existing and future retail/commercial offer in the Lidcombe Town Centre (1.1% of total stock).</p> <p>Although the assessment identifies the greater number of jobs arising from the proposal, no adequate analysis has been undertaken on the impact of losing existing and future industrial and urban services jobs. Additionally, no assessment has been undertaken if the growth in service-based jobs could be accommodated within existing business and commercial zones within the LGA.</p> <p>The rezoning of industrial lands for mixed-use purposes introduces the potential to create an expectation that would result in further rezoning of industrial lands in the immediate area, especially south of the site.</p> <p>The proposal has not sufficiently explored the potential for further employment uses at the site to support the industrial area to the south, prior to selecting a predominantly residential land use.</p>
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4.3 Infrastructure

The following table provides an assessment of the adequacy of infrastructure to service the site and the development resulting from the planning proposal and what infrastructure is proposed in support of the proposal.

Table 9 Infrastructure assessment

Infrastructure	Assessment
Services and road	The Department notes that the intensification of the site and likely demand on local infrastructure and services would need to be addressed. The proposal recognises the future requirement to upgrade the East / Railway Street intersection to support projected traffic growth by the nomination of land for acquisition.

5 Consultation

5.1 Community

The planning proposal is not supported to proceed to public exhibition.

5.2 Agencies

The planning proposal is not supported; therefore, no further agency consultation is required.

6 Timeframe

No time frame is required as the proposal is recommended to not proceed.

7 Local plan-making authority

There is no requirement to appoint a local plan-making authority as the proposal is recommended to not proceed.

8 Assessment Summary

The planning proposal is not supported to proceed for the following reasons:

- The proposal does not give effect to the Central City District Plan as the site is identified in the plan as industrial lands to be reviewed and managed;
- there is no adequate strategic justification to transition the site from employment lands to a mixed-use retail/commercial and residential development;
- the type of employment and jobs generated by the planning proposal would differ from the type of employment that could be generated under the current planning controls;
- there has been no investigation of alternative employment-generating uses that are consistent with the existing zoning; and
- that rezoning of the site may set an undesirable expectation for converting industrial and urban services land (as identified in the District Plan) to enable residential and commercial uses.

9 Recommendation

It is recommended the delegate of the Secretary:

- Agree that any inconsistency with Section 9.1 Direction 4.1 Acid Sulfate Soils is of minor significance; and
- Note that the inconsistencies with section 9.1 Directions 1.1 Business and Industrial Zones, 6.2 Reserving Land for Public Purposes and 6.3 Site Specific Provisions remains unresolved.

It is recommended the delegate of the Minister determine that the planning proposal should not proceed because:

- The proposal contains unresolved inconsistencies with section 9.1 Directions 1.1 Business and Industrial Zones, 6.2 Reserving Land for Public Purposes and 6.3 Site Specific Provisions.
- The proposal does not give effect to the Central City District Plan 'Action 49 Review and manage industrial and urban service land'. There is no strategic justification to transition the site from employment lands to mixed-use residential/commercial and the Greater Sydney Commission has confirmed that proposal is inconsistent with the review and manage approach as outlined by the District Plan.
- The proposal is inconsistent with the Cumberland 2030: Local Strategic Planning Statement's response to retaining and managing industrial lands, primarily for employment uses.
- It is considered that permitting residential and retail development would undermine the ongoing operation of the industrial precinct and set an undesirable expectation for rezoning industrial land for residential purposes in the area.



(Signature)

____ 11/02/2021 _____
(Date)

Peter Pham

A/Manager, Central (GPOP)



(Date) _____ (Signature)

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