

planning proposal
report



planning proposal report



20-21 boorea avenue
lakemba

prepared for
Lebanese Muslim Association

prepared by



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1 executive summary

1.1 Overview

This Planning Proposal Report has been prepared on behalf of our client, the Lebanese Muslim Association (LMA). The intended outcome of this Planning Proposal is to gain support from Canterbury Bankstown Council to enable additional opportunities for the future redevelopment of 20-21 Boorea Avenue, Lakemba (the Site). Specifically, it is intended to enable a Residential Care Facility development on the Site to service the needs of the local community.

The Planning Proposal seeks to amend the Canterbury Local Environmental Plan 2012 (CLEP 2012) in whatever manner is considered appropriate by the Council or the Department of Planning. The suggested amendments are as follows:

- Amendment to Schedule 1 Additional Permitted Uses to allow development for the purposes of a Residential Care Facility at 20-21 Boorea Avenue, Lakemba.
- Amend the maximum floor space ratio (FSR) for 21 Boorea Avenue, Lakemba from 1:1 to 2:1.

Support for the intended outcome is based on the following:

- It is consistent with the Sydney Metropolitan Plan: A Plan for Growing Sydney, including the priorities for the South Subregion; Draft South District Plan; Employment Lands Development Program 2015; Sydney to Bankstown Urban Renewal Corridor Strategy; Towards 2032 – City of Canterbury Economic Development and Employment Strategy and Canterbury's Community Strategic Plan 2014-2023.
- It has negligible adverse environmental impacts.
- It provides opportunity for increased employment density.
- It allows an appropriate land use and built form transition from industrial zoned land to residential zoned land.
- It responds to existing and anticipated employment trends that will see higher demand for knowledge and service industry jobs.
- It retains the ongoing viability and integrity of the industrial employment lands.
- It provides additional housing opportunities and housing diversity for seniors and seniors with a disability in a developed location that has quality access to retail, education and community facilities as well as public transport services.
- It integrates seniors housing and healthcare services that complement other community services provided by the LMA within the immediate precinct.

1.2 Concept Master Plan

A Concept Master Plan has been prepared by Thomson Adsett (see Appendix A). It has been developed with careful consideration of the Site and surrounding context, including the prevailing zoning and site constraints.

The Concept Master Plan demonstrates the ability to accommodate the following:

- Residential accommodation: 112 Beds, 28 of these being dementia specific beds.
- Vehicle access and car parking: Vehicle entrance via Boorea Avenue to a basement car park. 40 passenger vehicle spaces provided within basement parking.
- Single access driveway providing an “at-grade” porte cochere.

1.3 Planning Outcomes

The Site has been assessed as suitable for a Residential Care Facility and therefore represents a strategic opportunity to:

- Contribute to the available local supply of good quality, seniors care facilities. The Site provides an opportunity as a single landholding that can deliver new, appropriate housing in the short term.
- Be consistent with State Government policy, which supports growth within existing, well-connected centres. It provides significant opportunities in close proximity to existing facilities, services and public transport.
- Develop without adverse traffic or parking impacts. Existing traffic characteristics, within the local area, have been considered and impacts are satisfactory. Future parking requirements of the proposal (assessed against Council’s parking standards) can be accommodated on the Site.
- Ensure that the design of any future development can generally achieve the principles and requirements of SEPP (Housing for Seniors or People with a Disability) 2004.
- Improve the amenity to the Site and existing properties immediately surrounding the Site. It is anticipated that the proposed scheme will enhance the interface between the Site and the surrounding residential properties than what is currently afforded by the existing industrial land use.
- Assist Council in its vision for Lakemba Local Centre by supporting the ongoing viability and integrity of the industrial employment lands and providing additional employment opportunities on the Site within a growth sector (Health).
- Provide an appropriate transition in scale between the Site and adjacent residential zones.

The assessments in the background reports, leading to conclusions in this Planning Proposal submission, support the use of the land as a Residential Care Facility. The conclusions in this Planning Proposal therefore seek the support of Canterbury Bankstown Council to changes to CLEP 2012 and subsequently, in the submission of the Planning Proposal for a Gateway Determination to undertake the following:

- Amendment to Schedule 1 Additional Permitted Uses to allow development for the purposes of a Residential Care Facility at 20-21 Boorea Avenue, Lakemba.
- Amend the maximum floor space ratio (FSR) for 21 Boorea Avenue, Lakemba from 1:1 to 2:1.

2 introduction

2.1 The Client

This Planning Proposal Report has been prepared for the Lebanese Muslim Association (LMA). It seeks amendments to CLEP 2012 to facilitate the development of a Residential Care Facility at 20-21 Boorea Avenue, Lakemba.

2.2 The Proposal

The intended outcome of this Planning Proposal is to gain support from Canterbury Bankstown Council to enable additional opportunities for the future redevelopment of 20-21 Boorea Avenue, Lakemba (the Site). Specifically, it is intended to enable a Residential Care Facility development on the Site.

The Planning Proposal seeks to implement changes to the statutory provisions to enable the development of the Site for a Residential Care Facility. This would require an amendment to the Canterbury Local Environmental Plan 2012 (CLEP 2012) along the following lines:

- Amendment to Schedule 1 Additional Permitted Uses to allow development for the purposes of a Residential Care Facility at 20-21 Boorea Avenue, Lakemba.
- Amend the maximum floor space ratio (FSR) for 21 Boorea Avenue, Lakemba from 1:1 to 2:1.

Proposed Mapping is included at Appendix B.

The Planning Proposal is accompanied by a Concept Master Plan prepared by Thomson Adsett to provide a comprehensive analysis of the Site's opportunities and constraints. The supporting studies submitted as part of this Planning Proposal inform and support the proposed amendments to CLEP 2012.

The Concept Master Plan demonstrates the ability to accommodate the following:

- Residential accommodation: 112 Beds, 28 of these being dementia specific beds.
- Vehicle access and car parking: Vehicle entrance via Boorea Avenue to a basement car park. 40 passenger vehicle spaces provided within basement parking.
- Single access driveway providing an at-grade porte cochere.

Based on the above, it can be anticipated that between 70 to 100 full time positions would be required to service the facility. At any one time, there would be approximately 20-30 staff present on the Site, working across three key time shifts in a 24 hour period.

2.3 This Report

The Planning Proposal Report has been prepared in accordance with:

- Section 55 of the Environmental Planning and Assessment Act 1979 (the EP&A Act)
- The relevant guidelines prepared by the NSW Department of Planning and Infrastructure including *A Guide to Preparing Local Environmental Plans* and *A Guide to Preparing Planning Proposals*.
- Relevant Section 117 Directions.

The Planning Proposal Report includes the following information:

- A description of the Site and its context.
- Indicative site plan showing sufficient detail to indicate the effect of the proposal (Concept Master Plan prepared by Thomson Adsett).
- Statement of the objectives and intended outcomes of the proposal.
- Explanation of the provisions of the proposal.
- Summary of the justification of the proposal.
- Description of the community consultation process that would be undertaken.
- Conclusion to this Report.

2.4 Background

Meetings were held between the Proponent and Council on 28 March 2017 and 23 May 2017 in order to receive feedback from Council on the proposed development of a Residential Care Facility and the planning issues that would relate to the project. The Planning Proposal reflects the discussions and outcomes of these meetings to provide a desirable strategic outcome for the Site.

3 the land to which the planning proposal applies

3.1 Description of the Site

The Site comprises 20 and 21 Boorea Avenue, Lakemba. These are legally identified as Lot 25 in DP 13586 and Lot X in DP 377169, respectively. The Site area is approximately 3,200m². The allotments combine to provide an irregularly-shaped parcel of land, providing an approximate frontage to Boorea Avenue, at its terminating cul-de-sac, of 18m.

The Site is situated to the north-west of the Boorea Avenue terminating cul-de-sac, approximately 30m to the north of its junction with Merrick Avenue, Lakemba. The Site is accessed solely from Boorea Avenue.

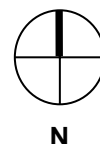
Figure 1 | Aerial view of the Site and surrounds



Source: Sixmaps 2017



The Site: 20-21 Boorea Avenue, Lakemba



3.2 The Locality

The surrounding locality is predominantly characterised by low density, residential land uses to the south and industrial and employment land uses to the north. The locality is bound by Punchbowl Road to the north and Wangee Road to the west. Coxs Creek runs to the north of the Site in a concrete channel.

The Site is approximately 900 metres north of Lakemba Railway Station and is readily accessible to key services and facilities. The Site is in close proximity to several bus routes in all directions.

The LMA has a variety of buildings and services in the immediate precinct and are active in supporting the local community. Lakemba Mosque is adjacent the Site, as well as a range of services such as a gymnasium, a café and a primary school in close proximity. These facilities provide support and education to residents. The provision of the proposed Residential Care Facility is anticipated to be an integral part of the LMA community.

Adjoining Sites to the East

4 Frazer Street, Lakemba

The property accommodates Fabre Australia, an automotive parts sales premises. The business operates from a brick warehouse with tin roofing. The property is predominantly concrete with several large trees located along the southern and eastern boundaries. Vehicular access is from the terminating cul-de-sac at Frazer Street, which comprises a series of industrial warehouses and uses.

6 Frazer Street, Lakemba

The property consists of a brick warehouse with tin roofing. The current tenants are Hume Building Materials. The property is predominantly concrete with an array of building materials stacked outside on the eastern side of the Lot. Vehicular access is from Frazer Street.

Adjoining Sites to the South

18 Boorea Avenue, Lakemba

The property comprises a single storey, detached, residential dwelling with a pitched tile roof. The property is predominantly turfed and vehicular access is from Boorea Avenue.

Adjoining Sites to the West

Lot Y in DP 377169

The property comprises a single storey shed with pitched, tin roofing. The property is predominantly turfed and has several large, mature trees along the northern boundary. Vehicular access is from Wangee Road along an access handle via 69 Wangee Road to the west.

67 Wangee Road, Lakemba

Located on the property is the Lakemba Mosque, which is managed by the LMA. The Mosque has a deep front setback that incorporates large palm trees and a stair way entry to the building. Vehicular access to the property is from Wangee Road.

Adjoining Sites to the North

75 Wangee Road, Lakemba

On the northern side of Coxs Creek is a four storey, commercial building that includes the LMA's head offices. The building footprint covers the majority of the property. Vehicular access is from Wangee Road.

3.3 Planning Context

Canterbury Local Environmental Plan 2012

The relevant local planning instrument that currently applies to the Site is the Canterbury Local Environmental Plan 2012 (CLEP 2012). Table 3.1 below, outlines the current zoning and key controls relevant to the Site.

Table 3.1| Current zoning and key controls relevant to the Site

Address	Zone	FSR	Building Height
21 Boorea Ave	IN2 Light Industrial	1:1	N/A
20 Boorea Ave	R4 High Density Residential	0.75:1	8.5m

An extract from the land zoning maps LZN_003 and LZN_004 are provided at **Figure 2** below. The extracts indicate the zoning context of the area, with the Site addressing predominantly low density, detached, residential dwellings to the south, as it is on the fringe of the IN2 Light Industrial zoned land. **Figure 3** indicates the Height of Buildings development standard applicable to the Site and **Figure 4** indicates the maximum FSR allowable on the Site.



Figure 2| Extract map of land zoning from CLEP 2012



Figure 3| Extract map of height of buildings from CLEP 2012

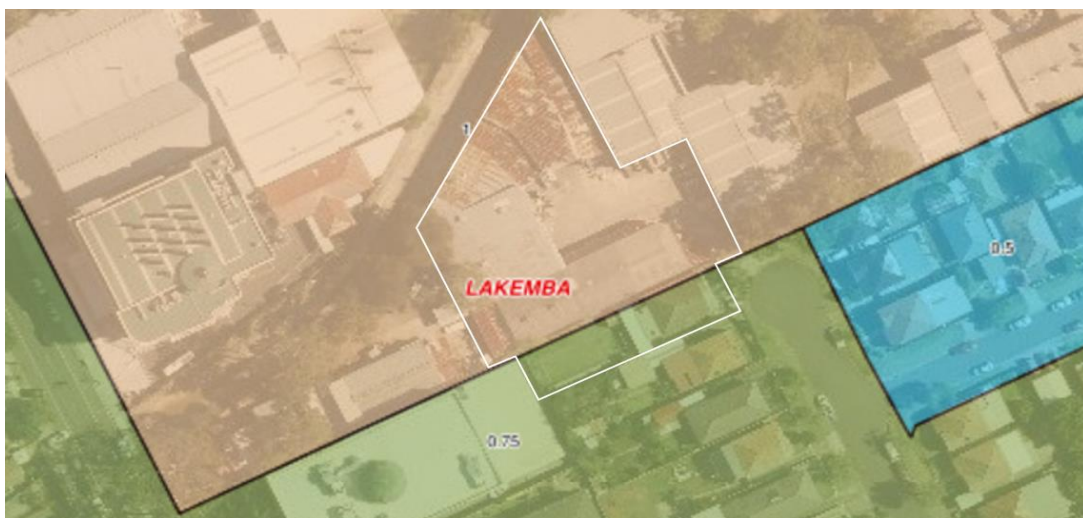


Figure 4| Extract map of FSR from CLEP 2012

4 request to prepare a planning proposal

This section of the Report has been prepared to follow the structure and format of the NSW Department of Planning and Infrastructure's (now the Department of Planning & Environment) *A Guide to Preparing Planning Proposals* (October 2012).

Accordingly, the Planning Proposal is discussed in the following four parts:

- Part 1: A statement of the objectives or intended outcomes.
- Part 2: An explanation of the provisions that are to be included in the proposed LEP.
- Part 3: The justification for the Planning Proposal and the process for the implementation.
- Part 4: Details of community consultation that is to be undertaken for the Planning Proposal.

Discussion for each of the above parts is outlined below.

4.1 Part 1 – Objectives and Intended Outcomes

The primary objective of the Planning Proposal is to provide the opportunity for a Residential Care Facility at 20 and 21 Boorea Avenue, Lakemba. By facilitating a Residential Care Facility, the Planning Proposal will achieve the following benefits:

- Provide increased housing options for seniors, particularly in terms of assisted living through a Residential Care Facility.
- Increase the opportunity for employment at the Site.
- Increase the viability of future use for employment by providing additional employment opportunities.
- Retain the option for industrial uses on the Site.
- Improved interface to Boorea Avenue and better transition from industrial land uses to residential land uses while minimising the potential for reverse amenity impacts from adjoining light industrial activities to the Site.
- Provide a Residential Care Facility in close proximity to existing services, facilities and public transport including those provided by the LMA in close proximity to the Site.

The intended outcome would be the opportunity for a Development Application (DA) to be lodged for a Residential Care Facility, consistent with the Concept Master Plan as described below.

Concept Master Plan

A Concept Master Plan has been prepared by Thomson Adsett that demonstrates the potential built form and opportunities associated with the redevelopment of the Site for a Residential Care Facility. The concept design assists in envisaging future development on the Site and informs the appropriate planning controls required to facilitate that use of the Site.

4.2 Part 2 – Explanation of Provisions

This Planning Proposal Report seeks to gain support from Canterbury Bankstown Council to enable the future redevelopment of 20-21 Boorea Avenue, Lakemba. Specifically, it is intended to enable a Residential Care Facility on the Site.

The Planning Proposal seeks to amend the Canterbury Local Environmental Plan 2012 (CLEP 2012) as follows:

- Amendment to Schedule 1 Additional Permitted Uses to allow development for the purposes of a Residential Care Facility at 20-21 Boorea Avenue, Lakemba.
- Amend the maximum floor space ratio (FSR) for 21 Boorea Avenue, Lakemba from 1:1 to 2:1.

The amendments are considered the most appropriate to achieve the intended outcome for the following reasons:

- By adding Residential Care Facility as a Schedule 1 Additional Permitted Use, 21 Boorea Avenue retains its IN2 Light Industrial Zoning and associated permissible land uses.
- By only requesting FSR changes to 21 Boorea Avenue, Council can be satisfied that additional bulk and scale will not solely be provided to the existing R4 High Density Residential Zone at 20 Boorea Avenue.

4.3 Part 3– Justification of the Proposal

This section addresses the specific questions which “*must be discussed with reasons explained*”, as set out in Part 3 of the NSW Department of Planning and Infrastructure’s (now the DoP&E) publication: *A Guide to Preparing Planning Proposals*. This section reviews the proposed amendments to the Canterbury Local Environmental Plan 2012 and addresses specific questions outlined in the Guide, which are separated into sections A to D.

Section A – Need for the Planning Proposal

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

While not directly the result of any strategic study or report, it is supported by a variety of strategic reports that are discussed in greater detail in Section B.

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

The Planning Proposal outlines the benefits associated with the proposed Residential Care Facility on the Site. It has been prepared based on a comprehensive analysis of the Site and its context, including an array of technical reports that are submitted as part of the Planning Proposal. Given the current IN2 Light Industrial zoning at 21 Boorea Avenue, an amendment to CLEP 2012 is the only viable method for providing a Residential Care Facility, meeting the objectives and intended outcomes.

The proposed amendments to CLEP 2012 are considered the most appropriate to achieve the intended outcome for the following reasons:

- By adding Residential Care Facility as a Schedule 1 Additional Permitted Use, 21 Boorea Avenue retains its IN2 Light Industrial Zoning and associated permissible land uses.
- By only requesting FSR changes to 21 Boorea Avenue, Council can be satisfied that additional bulk and scale will not be provided to the existing R4 High Density Residential Zone at 20 Boorea Avenue.

Is there a net community benefit?

There will be a net community benefit to the local community and to the Canterbury Bankstown Local Government Area. The benefits and costs are discussed below.

Benefits

Increased supply of seniors housing

Should the provision of a Residential Care Facility be permitted on the Site, it would be capable of supporting the proposed development demonstrated in the Concept Master Plan, with potentially 112 new beds for the elderly, many of whom may suffer from dementia and be in need of professional care. The Site is serviced with all necessary public utility services including electricity, water and sewer and accordingly, there are no impediments to future redevelopment on the Site.

Increased employment density

The development of the Site for a Residential Care Facility would provide approximately 100 full time positions in the health care industry, which is a much greater number than the current use of the Site or the average light industrial employment density.

Improvement to landscape and street character

The Planning Proposal will provide opportunities for significant urban design improvements, particularly at the frontage to Boorea Avenue. In the current context, Boorea Avenue is entirely residential with the exception of 21 Boorea Avenue and the back of 4 Frazer Street (which is accessed via Frazer Street). The provision of a land use that is residential in nature, while still providing employment opportunities, provides an appropriate transition from industrial uses to the north to the residential nature of Boorea Avenue.

Costs

Additional traffic

Vehicle access for the Site will be from the Boorea Avenue frontage. The proposed use of the Site for a Residential Care Facility will likely result in additional traffic associated with future development. This access point will be located where there are excellent sight distances and will comply with the design requirements of AS2890.1.

However, the locality offers considerable advantages for residential based development of underutilised sites due to:

- The close proximity of primary public transport services (rail and buses).
- The convenient proximity to employment, shopping and entertainment facilities available in the centre along with the nearby educational and hospital/medical services.

A Traffic and Parking Impact Assessment was undertaken by Stanbury Traffic Planning in order to ascertain the viability of a proposal at the envisaged scale and capacity. The assessment concludes that the surrounding road network operates with a reasonable level of service and is capable of accommodating additional demand.

It is noted in the Traffic and Parking Impact Assessment that the proposed development complies with the off-street vehicular parking provisions within SEPP (Housing for Seniors or People with a Disability) 2004 and that, based on the assessment undertaken, there are no traffic or parking related issues that should prevent approval of the Planning Proposal.

Amenity impacts during construction

The proposed site-specific amendments to CLEP 2012 will likely result in a redevelopment of the Site. This may cause temporary amenity impacts during any construction such as noise or dust.

In conclusion, the anticipated benefits associated with the Planning Proposal outweigh the costs. This is particularly the case given the costs are primarily associated with any redevelopment that would occur on the Site, regardless of the proposed changes to CLEP 2012. There is therefore a net community benefit arising from the intended outcome of this Planning Proposal.

Section B – Relationship to strategic planning framework

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

The following strategic planning documents are relevant to the Site:

- A Plan for Growing Sydney
- Draft South District Plan
- Sydney to Bankstown Urban Renewal Corridor Strategy
- Employment Lands Development Program 2015
- Towards 2032 – City of Canterbury Economic Development & Employment Strategy
- Community Strategic Plan 2014-2023
- Applicable Ministerial Directions (Section 117).

There is a clear alignment between high level strategic planning and the proposed vision for the Site. The redevelopment of the Site will respond positively to forecast population growth and ageing for the area and will ensure the ongoing protection and productivity of employment lands, as well as the availability of healthcare jobs and seniors housing within the Canterbury Bankstown LGA. The relevant strategic documents are discussed in detail below.

A Plan for Growing Sydney

In December 2014, the NSW Government released a new framework to guide land use and planning decisions for Sydney over the next 20 years. *A Plan for Growing Sydney* (the Plan) supersedes the Metropolitan Plan for Sydney 2036. The Plan identifies that over the next 20 years, Sydney's population will grow much faster than over the past 20 years. The Plan projects that Sydney will need approximately 664,000 additional homes over the next 20 years. The Plan includes the Government's visions for Sydney and the goals to achieve the vision, as outlined below,

The Government's vision for Sydney is *a strong global city, a great place to live*.

To achieve this vision, the Government has set the following goals:

- *a competitive economy with world-class services and transport;*
- *a city of housing choice with homes that meet our needs and lifestyles;*
- *a great place to live with communities that are strong, healthy and well connected; and*
- *a sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.*

The Plan sets out actions that will assist to deliver the goals listed above. Goal 2 of the Plan addresses housing and housing choice, with the directions and actions including to accelerate housing supply across Sydney; accelerate urban renewal across Sydney; to provide homes closer to jobs and improving housing choice to suit different lifestyles.

Consistent with The Plan, the Planning Proposal:

- Will deliver new seniors housing within the short term and as such will contribute to achieving the housing targets and housing choice.
- Responds to a recognised need (and market demand) for this type of housing in this locality.
- Will provide new homes in close proximity to existing infrastructure and services.
- Accelerate urban renewal across Sydney near train stations.
- Increase the number of jobs available in a growing employment sector.

The proposal directly contributes to the relevant strategic goals and directions of the Plan as discussed in **Table 4.1** below.

Table 4.1 | A Plan for Growing Sydney

Goal	Direction	Project Contribution
1. A competitive economy with world-class services and transport	1.10 Plan for Education and health services to meet Sydney's growing needs	The Planning Proposal responds to the South Subregion's growing and aging population through the potential provision of much needed health care services to the local area.
2. Sydney's housing choices	2.1 Accelerate housing supply across Sydney 2.1.1 Accelerate housing supply and local housing choices	<p>The Planning Proposal will increase the density of the land and provide a Residential Care Facility. The Plan identifies that the Government and local councils need to understand and respond to the housing market in each and every Local Government Area.</p> <p>The Demographic Analysis Report undertaken by Premier Consulting Australia Pty Ltd provides detailed information confirming the need for increased seniors housing beds within the locality.</p>
	2.2 Accelerate urban renewal across Sydney – providing homes closer to jobs. 2.2.2 Undertake urban renewal in transport corridors which are being transformed by investment, and around strategic centres	<p>The Plan identifies that urban renewal on sites that are underutilised, is a priority. The Planning Proposal will facilitate a Residential Care Facility that will maximise the use of the Site. Currently, the Site is in decline and underutilised. Through the provision of more employment opportunity within an employment growth sector, the continued viability of the local centre is enhanced.</p> <p>The Planning Proposal expands the housing supply within walkable distance from bus routes and train lines with direct links to strategic centres and transport centres. In addition, there are direct links to education and recreational facilities; medical services and shopping opportunities.</p>
	2.3 Improve housing choice to suit different needs and lifestyles	The Planning Proposal provides housing choice for seniors and people with a disability.

Goal	Direction	Project Contribution
3. Sydney's great places to live	3.1 Revitalise existing suburbs	<p>The Plan identifies that <i>focusing new housing within Sydney's established suburbs brings real benefits to communities and makes good social and economic sense.</i></p> <p>The proposed amendments will enable redevelopment of the Site to provide a re-activation of the Boorea Avenue frontage and an improved urban form and streetscape appearance.</p> <p>As it stands, the existing industrial use does not significantly contribute to the vitality of the streetscape. In addition, the Site is the sole industrial site that is accessed via Boorea Avenue, a residential street.</p> <p>The Site, being a large lot under single ownership, presents an opportunity to redevelop immediately and act as a catalyst for future quality development of the surrounding locality. In addition, the Planning Proposal recognises research that has demonstrated that healthcare employment uses will continue its large growth in the economic environment of the Canterbury Bankstown LGA going forward.</p>
4. Sydney's sustainable and resilient environment	<p>4.2: Build Sydney's resilience to natural hazards</p> <p>4.3 Manage the impacts of development on the environment</p>	<p>The Planning Proposal includes a comprehensive Flood Impact Report by Storm Pty Ltd. The Report concludes that the proposed Residential Care Facility can maintain flood storage and should incorporate a drainage layout that can cater for 1 in 20 years flows and 1 in 100 years flows.</p> <p>The Planning Proposal defines key principles relating to land use, massing and built form, public domain and sustainability that will guide the future development of the Site and surrounding locality, taking into consideration the Site's relationship with surrounding uses.</p>

South Subregion

“A Plan for Growing Sydney” sets priorities for each Subregion. The South Subregion has as one of its priorities to “*Accelerate housing supply, choice and affordability and build great places to live*”, particularly around established and new centres along public transport corridors.

The Planning Proposal will allow a high quality Residential Care Facility for seniors and people with a disability to be built within a local centre, close to jobs, amenities and recreation areas that are well connected via public transport to nearby Strategic Centres.

Subsequently, the Planning Proposal will work to assist Canterbury Bankstown Council and the Department of Planning & Environment in achieving this priority by providing opportunities for employment and additional housing options in the local centre.

Draft South District Plan

The Draft South West District Plan (the Draft District Plan) sets out the priorities and actions that will shape the District’s future and guide policy decisions, while progressing the directions of *A Plan for Growing Sydney*. The Draft District Plan notes that the District’s population will grow by over 204,000 by the year 2036, while the make-up will change as the overall population becomes older. To meet these challenges, the Draft District Plan identifies that the South District will need to improve housing diversity and affordability, while creating great places that respond to people’s need for services.

The Draft District Plan focuses on accommodating employment opportunities, particularly in the health and education sectors, as these are the two industries experiencing the largest growth in the District, having increased by 73% over the last 20 years. This shift in the South District’s economic make up illustrates the significant potential of the health sector to play an integral role in the future of the South District’s employment lands.

The Draft District Plan envisages local centres that offer better access to local jobs and services and provide opportunities to create new types of housing that are close to public transport. The District’s multicultural spirit is referenced within the Draft District Plan and is to be protected. Productivity, Liveability and Sustainability are the three major priorities of the Draft District Plan and they are considered each in turn, below.

Productivity Priorities

The Planning Proposal will assist in achieving the District's overarching productivity priorities by:

- Growing economic activity in the local centre of Lakemba.
- Leveraging and growing health industry assets as a catalyst to grow smart jobs.
- Potential to grow research and technological facilities on Site.
- Provide residents with a greater number of jobs and services within 30 minutes from their homes, lowering traffic congestion across Sydney.

The Draft District Plan also seeks to facilitate the reinforcement and/or expansion of allied health and research activities. As the population grows and ages, the Draft District Plan notes that it is necessary to provide infrastructure to support these groups. By allowing a Residential Care Facility on the Site, Council is in effect providing opportunities for new health service providers to offer a large number of jobs in this sector, within a local centre.

Furthermore, the Draft District Plan aims to protect and support employment and urban services land by taking a precautionary approach to amending employment lands. The Planning Proposal recognises the critical role that employment land plays in the South District and as a result, has retained the current zoning on the Site.

From this, the Planning Proposal seeks to protect the Site as employment generating land, while enhancing the ongoing employment-generating viability of the Site through the proposed Schedule 1 Additional Permitted Use of Seniors Housing. This will allow for a dramatic increase in employment generation possible on Site, within one of the highest growth sectors in the South District.

Livability Priorities

The Planning Proposal will assist in achieving the District's overarching Livability priorities by:

- Improving housing choice and diversity through the provision of a Residential Care Facility, for which there is a noted need within the area. Of the housing stock in the South District, 85% are detached dwellings.
- Creating great places through an architecturally designed building with quality open spaces and hard and soft landscaping components.
- Fostering cohesive communities by contributing to the facilities and services that surround the Site, including those run by the LMA. The LMA initiatives in the area have provided integral community services and facilities such as a primary school, gymnasium, café, business meeting rooms and a Place of Public Worship.

- The proposed Residential Care Facility is, in this context, an important contribution to this area as it will provide additional housing for seniors and employment opportunities for local community members.
- Responding to people's need for healthcare services for seniors and seniors with a disability.
- Supporting the provision of health facilities and services.

Sustainability Priorities

The proposed priorities and actions for a sustainable South District are based on the District's two distinct areas: the urbanised landscape generally north of Port Hacking, to which the Planning Proposal applies and the southern and western areas of large expanses of native vegetation; Defence lands at Holsworthy Military Reserve and the Royal and Heathcote National Parks.

The Planning Proposal will assist in achieving the District's overarching Sustainability priorities by:

- Enhancing the landscape and visual amenity of the Site for residents and from the public domain through the provision of a well-considered, Conceptual Master Plan.
- Provide a climate controlled building that will be both efficient and resilient, increasing the capacity of the Site to remain sustainable in the long term.

The Planning Proposal will allow a DA for a Residential Care Facility that will provide a high quality, architectural, outcome that contributes to improved environmental performance by adhering to the principles of ESD. By making more efficient use of water, energy, materials and improving waste management systems on Site, the proposed development will increase the Site's productivity while reducing its impacts on the environment.

The Draft District Plan incorporates planning principles that underpin many of the abovementioned priorities; these principles are as follows:

- Principle 1: Increasing housing choice around all centres through urban renewal in established areas.
- Principle 2: Stronger economic development in strategic centres and transport gateways.
- Principle 3: Connecting centres with a networked transport system.

The Planning Proposal will assist Council in achieving the Draft District Plan's planning principles by increasing the variety and availability of housing within a local centre and making travel to work easier and shorter, thereby reducing traffic congestion across Sydney.

The provision of approximately 100 healthcare jobs through the proposed Residential Care Facility development will promote the local centre's productivity, strengthening the economic development of the area. Moreover, the Site is located close to train and bus services, making it an accessible focal point for the community while increasing prospects for economic growth and the creation of jobs.

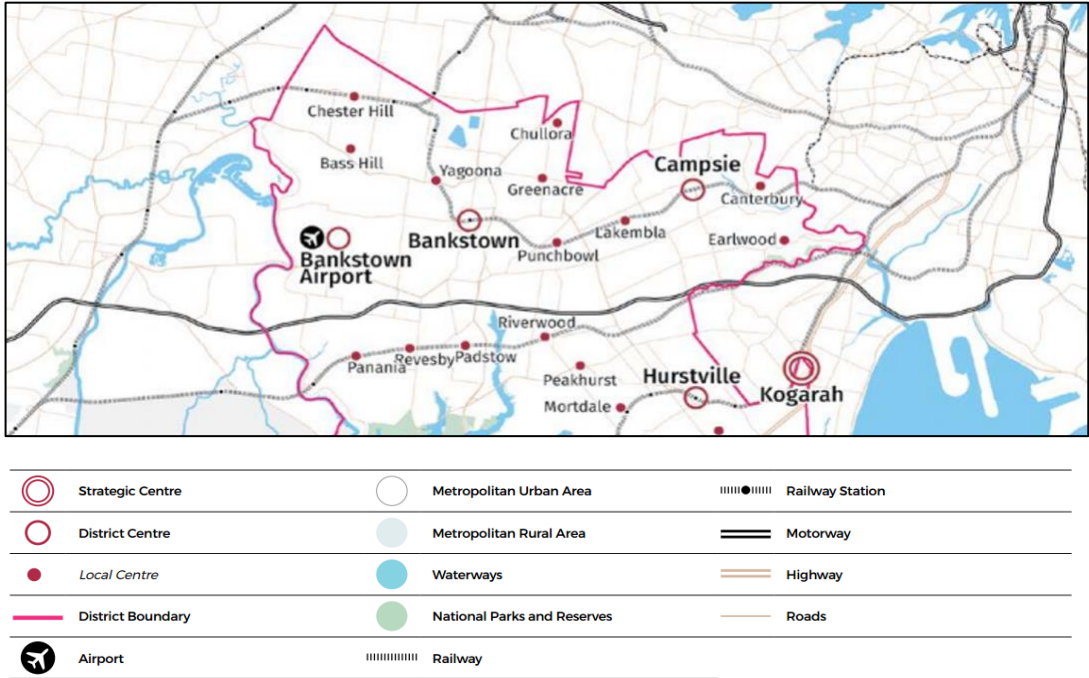
In terms of the South District's population, the greatest proportional growth will be in the 85+ age group, which is expected to increase by 85% on today's numbers. From this, it is anticipated that the need for seniors housing would be expected to grow alongside the growth of this cohort.

The Draft District Plan notes that the best way to provide seniors housing and aged care is to co-locate them in places that have a mix of different uses and services that make it easy for people to meet their day to day needs, or visit health services and community and cultural facilities.

The proposed Residential Care Facility co-locates seniors housing and aged care services with adequate space for parking, as well as quality open spaces. In this way, it is noted that the Planning Proposal is well placed in meeting the overarching priorities of Productivity, Liveability and Sustainability that make up the Draft South District Plan.

Figure 5 below is an extract from the Draft South District Plan indicating the Strategic, District and Local Centres.

Figure 5 | Strategic, District and Local Centres

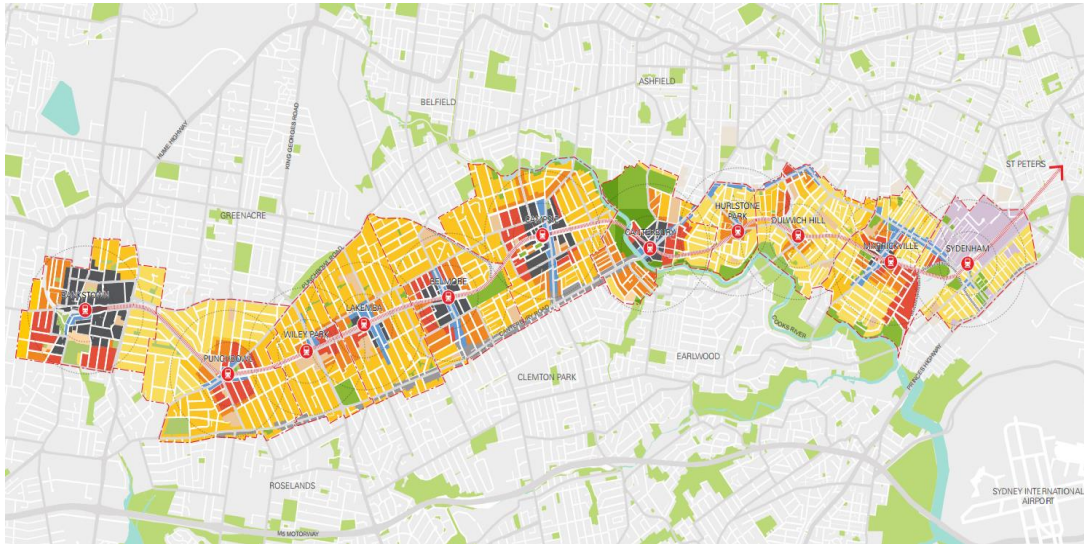


Source: Draft South District Plan 2016

Sydney to Bankstown Urban Renewal Corridor Strategy

The Land Use and Infrastructure Strategy establishes a strategic planning framework to guide future development and infrastructure delivery within the Sydenham to Bankstown Urban Renewal Corridor over the next 20 years, which includes a detailed plan for the Lakemba Precinct (see **Figure 6** below).

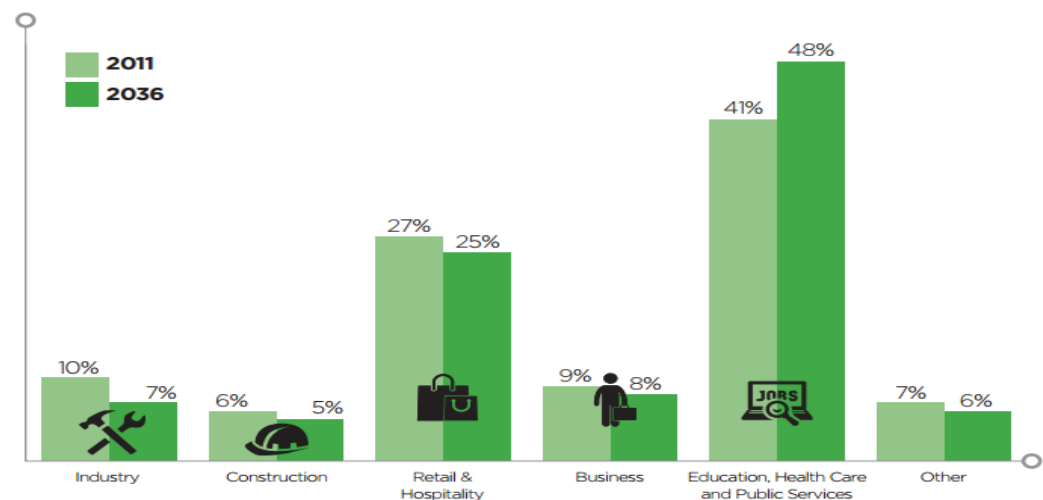
Figure 6 | Sydney to Bankstown Urban Renewal Corridor Strategy Precincts



Source: Sydney to Bankstown Urban Renewal Corridor Strategy

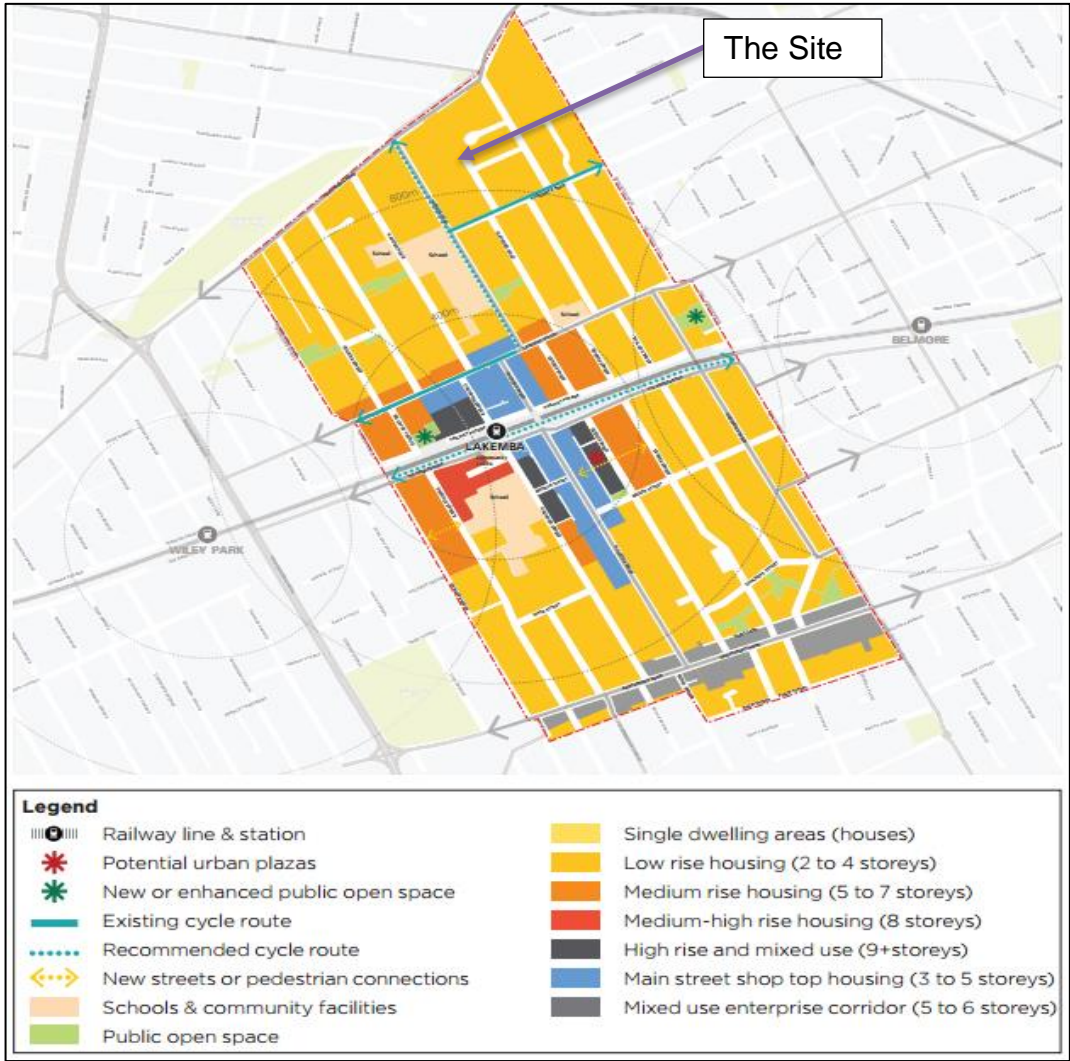
Within the Lakemba Precinct, the Strategy anticipates that an additional 735 jobs will be created within the precinct by 2036 (based on Bureau of Transport Statistics forecasts). Forty-eight (48%) of employment in the precinct will be in education, health care and public services and 25% in retail and hospitality. The Planning Proposal assists with the provision of healthcare jobs within the Lakemba Precinct as approximately 100 health care positions are anticipated within the proposed Residential Care Facility (see **Figure 7**).

Figure 7 | Projected jobs by industry in the Lakemba Precinct



Source: Sydney to Bankstown Urban Renewal Corridor Strategy

Figure 8 | Long Term Land use vision for Lakemba Precinct



Source: Sydney to Bankstown Urban Renewal Corridor Strategy

Figure 8 above illustrates the Strategy's long-term vision for the Site as an area for low rise housing (2 to 4 storeys). The proposed Residential Care Facility aligns with this vision by providing low rise, residential accommodation for seniors at a scale of 4 storeys.

Employment Lands Development Program 2015

The Employment Lands Development Program 2015 Report (the Program) provides a comprehensive analysis and data set of the state of play of industrial land supply across Metropolitan Sydney. The Program's key findings and trends illustrate that the vast majority of the total employment lands are located in the West which comprises the South West, West and West Central subregions. Furthermore, stocks of proposed future employment land have increased considerably from 2,435 hectares at January 2014 to 6,972 hectares at January 2015, the majority of which being located in the Western Sydney Employment Area.

The employment lands located in Lakemba make up 11.9 hectares, with 0.4 hectares undeveloped and 11.5 hectares already developed. While these employment lands may not be considered significant in the greater metropolitan context of Sydney, it is important that they be protected and enhanced for potential future employment generating ability.

The Planning Proposal recognises this need and takes a precautionary approach to amending CLEP 2012 in such a way that will protect and support employment land within the local context by retaining the industrial zoning of the Site while permitting additional employment-generating land uses.

Is the Planning Proposal consistent with a council's local strategy or other local strategic plan?

Towards 2032 - Canterbury Economic Development and Employment Strategy

An Economic Development and Employment Strategy (the Strategy) has been undertaken by SGS Economics and Planning. The Lakemba Precinct is described as having a strong cultural identity with a Light Industrial zoned area of 12 hectares that comprises businesses such as lumber, food distributors, glazers, smash repairs, storage, factory outlets, sign companies, wood turning, electrical wholesalers and spices/Arabic coffee wholesalers.

As one of a number of fragmented industrial precincts in the LGA, the Strategy recommends that Council should investigate opportunities to increase residential densities within the walking catchments of centres such as Lakemba; with the intention of adding to the vibrancy of the local centre and building the associated business base. The Strategy also noted that there is a potential conflict with the movements of larger vehicles and trucks within industrial estates and that options to improve safety and the perceptions of safety within employment lands should be considered.

The Planning Proposal will assist Council in achieving the abovementioned recommendations by permitting the proposed Residential Care Facility. Increasing the residential density on Site, coupled with the addition of healthcare jobs, the intended outcome would enhance the vibrancy of the local centre.

The Strategy recommends considering opportunities for new employment uses within the Lakemba Precinct. The Planning Proposal's amendment to CLEP 2012 Schedule 1 Additional Permitted Uses for the Site, to allow for a Residential Care Facility, will embody this strategic direction by providing the opportunity for new employment uses on Site.

Community Strategic Plan 2014-2023

Council's Community Strategic Plan 2014-2023 sets out the vision for the Canterbury LGA into the coming years and seeks to promote sustainable living and provide all of the services and facilities that the community needs for learning, health, sport and cultural expression.

The Community Plan sets out long term goals under five key themes being:

- Attractive city
- Stronger community
- Healthy environment
- Strategic leadership
- Improving Council

The Planning Proposal is consistent with Council's Community Strategic Plan in that it will help to achieve an 'Attractive City' through residential development that is an improvement, in keeping with the appearance to the street. By locating additional seniors housing close to public transport within a local centre, the environmental performance of the Planning Proposal is well balanced and more sustainable.

The Planning Proposal helps to achieve Council's Social Justice Guiding Principles by providing a Residential Care Facility that is in an accessible location. The LMA already provides several integral cultural community services within the immediate area and their provision of a Residential Care Facility would become a key part of the community.

The LMA will assist Council in promoting a stronger community by facilitating a Residential Care Facility within an identified multicultural area, enhancing the cultural value of the locality thereby improving meaningful community connections.

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

The Planning Proposal is consistent with the relevant State Environmental Planning Policies (SEPPs). The relevant SEPPs are identified in **Table 4.2** below.

Table 4.2| State Environmental Planning Policies

Policy	Details
SEPP 55 Remediation of Land	A preliminary waste classification was undertaken by Douglas Partners Pty Ltd on <i>in situ</i> material located at the Site. The Report found that the natural soils and bedrock within the sampled portions of the Site are preliminarily classified as VENM as there were no visual indicators of chemical contamination of materials in test pits, and contaminant concentrations were within typical background levels.
SEPP (Buildings Sustainability Index: BASIX) 2004	The BASIX SEPP requires residential development to achieve mandated levels of energy and water efficiency. The Planning Proposal will not hinder the ability to comply with BASIX.
SEPP (Housing for Seniors or People with a Disability) 2004	<p>The Planning Proposal will likely result in a DA for a Residential Care Facility. The proposal is generally compliant with the requirements of the SEPP as it is located within close proximity to appropriate public transport networks and is of level topography.</p> <p>While currently zoned IN2 Light Industrial, the proposal does not result in a Residential Care Facility located within the centre of a light industrial precinct. It is located on the fringe of the industrial zone and is surrounded by residential land and character. Directly adjoining industrial properties 'turn their back' to the Site and provide significant boundary walls. No material adverse amenity impacts are anticipated for the Site and design at a DA stage will be able to further minimise any adverse impacts.</p>
SEPP (Infrastructure) 2007	The Infrastructure SEPP aims to facilitate the efficient delivery of infrastructure across the State. The proposed development will require existing utility services to be upgraded and/or augmented to enable the future residential population to be accommodated. These works will need to be undertaken in accordance with the provisions of the SEPP.

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

Yes, the Proposal is consistent with the relevant Section 117 Directions, as discussed in Table 4.3. A comprehensive assessment against the Section 117 Directions is included at Appendix D.

Table 4.3 | S117 Directions

Direction	Comment
1. Employment and Resources	
1.1 Business and Industrial Zones	<p>Amending the LEP Schedule 1 will protect employment land while actively encouraging employment growth in an accessible location.</p> <p>The Planning Proposal will result in a net increase in the potential floor space for employment uses. Through the provision of the proposed residential care facility, the Planning Proposal will enhance the future viability of the local centre by providing a development that is aligned with existing employment trends while retaining the possibility of industrial employment.</p>
3. Housing Infrastructure and Urban Development	
3.1 Residential Zones	<p>The Proposal will broaden the range of housing choice and the size of the Site provides ample opportunity for good urban design. The Site is located within an established residential area with local services such as shops, educational, community and recreational facilities and public transport in close proximity.</p>

3.4 Integrating Land Use and Transport	<p>The proposal is consistent with the Direction for the following reasons:</p> <ul style="list-style-type: none"> ▪ The Site supports the principle of integrating land use and transport. ▪ The Site exhibits good access to public and private transportation use. ▪ The Site's proximity to public transport will provide opportunities for residents to access the Site. ▪ Being located within a Local Centre with access to jobs, services, housing and public transport, the Planning Proposal reduces the number of trips generated by future development on the Site.
4. Hazard and Risk	
4.3 Flood Prone Land	<p>A Flood Impact Report was carried out by Storm Pty Ltd and studied potential flood hazards and includes consideration of the potential flood impacts both on and off the subject land.</p> <p>The Report confirms that the proposed layout of the Residential Care Facility can provide additional flood storage to compensate for the lost storage if required, and that such a development would be appropriate for the Site.</p> <p>The flood Assessment has shown that the proposed building can maintain flood storage. The proposed ground level is at RL 19.00 m AHD which is above 1% ARI flood level plus 500mm free board.</p>
6. Local Plan Making	
6.3 Site Specific Provisions	<p>The Planning Proposal does not place unnecessarily restrictive site-specific planning controls on the Site. It will allow a specific land use (Residential Care Facility) to be carried out in the zone that the land is situated on.</p> <p>The Planning Proposal does not contain or refer to drawings that show details of the development proposal.</p>
7.1 Implementation of A Plan for Growing Sydney	<p>The Site is located broadly in the Bankstown — Sydenham corridor and will benefit directly from the implementation of the Sydney Rapid Transit. An increase in residential density in this location will increase housing supply in proximity to bus services. See Section B for consistency with the Plan.</p>

Section C –Environmental, social and economic impact

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 located within an established urban environment and comprises land that has been previously developed. There are no known critical habitats, threatened species or ecological communities within the Site and therefore, the likelihood of any negative ecological impacts is minimal.

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

Site investigations have confirmed that the Site is free of major constraints and that there are no likely environmental effects associated with the future development of the land that cannot be suitably mitigated through further design development.

The key findings of these preliminary investigations are provided below:

Stormwater and Flooding

The Site is partially flood affected. A flood Impact Report was undertaken by Storm Pty Ltd and concludes that the proposed Residential Care Facility could be safely constructed on the Site by incorporating appropriately drainage layout including pipes and pits.

Contamination

A preliminary waste classification was undertaken by Douglas Partners Pty Ltd on in situ material located at the Site. The Report found that, from the natural soils and bedrock within the sampled portions of the Site, no visual indicators of chemical contamination of materials in test pits, and contaminant concentrations were within typical background levels. Any potential contaminants will be appropriately managed and the Site made suitable for future residential use.

Traffic

The transport impacts are considered to be acceptable as follows:

- The proposed development will not have any unacceptable traffic implications in terms of road network capacity, and that no road improvements or upgrades would be required as a consequence of the Planning Proposal.
- The close proximity of primary public transport services (rail and buses)

Acoustic

An Acoustic Assessment of the proposed Residential Care Facility was undertaken by SLR Global Environmental Solutions and concludes that the proposed development is satisfactory in terms of its general indicative design. Acceptable internal noise levels can be achieved with incorporation of the recommended controls in the Report.

Overall, it is considered that the Site will not result in any significant environmental impact that would preclude it from being redeveloped for the purpose of a Residential Care Facility.

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

Social and economic effects associated with the proposed amendments to CLEP 2012 are considered to be positive given the following:

- The facility responds to the multicultural need to have diversity in the nature of residential care facilities looking after an increasing ageing population.
- It provides additional seniors housing options within close proximity to public transport and strategic employment and education centres.
- It provides work opportunities during the construction period of future development, and will provide approximately 100 healthcare jobs to the area.
- It provides a greatly improved transition between the residential and industrial areas.

It is therefore considered unlikely that the Planning Proposal and intended Residential Care Facility would have a negative social or economic effect upon the locality.

Section D – State and Commonwealth interests

Is there adequate public infrastructure for the planning proposal?

The Site is well serviced by all public utility services including:

- Electricity
- Water
- Sewer
- Telephone and internet service
- Public transport

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

There has been no consultation with Commonwealth public authorities or State Government authorities however, this consultation will be undertaken during the Planning Proposal process, once the matter has been referred for a Gateway determination.

5 community consultation

The relevant planning authority is required to consult with the community in accordance with the gateway determination as required under Clause 57 of the *Environmental Planning and Assessment Act 1979*. It is expected that the Planning Proposal will be required to be publicly exhibited for 28 days in accordance with the requirements of the NSW Department of Planning and Infrastructure (now the DoP&E) guidelines *A Guide to Preparing Local Environmental Plans*.

The specific process of the community consultation to be undertaken will be determined by Canterbury Bankstown Council as the Relevant Planning Authority however, it is anticipated that the public exhibition would be notified by way of:

- A public notice in the local newspaper(s).
- Advertising of the Planning Proposal on the Canterbury Bankstown Council website.
- Written correspondence to adjoining and surrounding landowners.
- The gateway determination and Planning Proposal be publicly exhibited at Council's offices, and any other locations, considered appropriate to provide interested parties with the opportunity to view the submitted documentation.

The Proponent would be happy to liaise further with Council to identify appropriate opportunities to further engage with the local community outside the formal public exhibition process to provide a greater understanding of additional issues that are relevant to the local community.

6 conclusion

The Planning Proposal Report has been prepared in accordance with Section 55 of the Environmental Planning and Assessment Act 1979 and the relevant guidelines prepared by the NSW Department of Planning and Infrastructure (now the DoP&E) including *A Guide to Preparing Local Environmental Plans* and *A Guide to Preparing Planning Proposals*. It sets out the justification for the proposed amendments to CLEP 2012 in relation to 20-21 Boorea Avenue, Lakemba. The objective is to facilitate a Residential Care Facility on the Site.

The Planning Proposal seeks to amend the Canterbury Local Environmental Plan 2012 (CLEP 2012) as follows:

- Amendment to Schedule 1 Additional Permitted Uses to allow development for the purposes of a Residential Care Facility at 20-21 Boorea Avenue, Lakemba.
- Amend the maximum floor space ratio (FSR) for 21 Boorea Avenue, Lakemba from 1:1 to 2:1.

Support for the intended outcome is based on the following:

- It is consistent with the Sydney Metropolitan Plan: A Plan for Growing Sydney, including the priorities for the South Subregion; Draft South District Plan; Employment Lands Development Program 2015; Sydney to Bankstown Urban Renewal Corridor Strategy; Towards 2032 – Canterbury Economic Development and Employment Strategy and Canterbury's Community Strategic Plan 2014-2023.
- It has negligible adverse environmental impacts.
- It provides opportunity for increased employment density.
- It allows an appropriate land use and built form transition from industrial zoned land to residential zoned land.
- It responds to existing and anticipated employment trends that will see higher demand for knowledge and service industry jobs.
- It retains the ongoing viability and integrity of the industrial employment lands.
- It provides additional housing opportunities and housing diversity for seniors and seniors with a disability in a developed location that has quality access to retail, education and community facilities as well as public transport services.
- It integrates seniors housing and healthcare services that complement other community services provided by the LMA within the immediate precinct.

Overall, it is considered that the Planning Proposal is satisfactory and that Canterbury Bankstown Council take the necessary steps to enable it to proceed to Gateway Determination under Section 56 of the EP&A Act.