

30 July 2021

Malcolm McDonald
Executive Director, Eastern Harbour City
Greater Sydney, Place & Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr McDonald,

160 Burwood Road Planning Proposal – PP 2020_002_00

I refer to your letter dated 28 April 2021 in relation to the above planning proposal for the Bushells site in Concord.

As part of the gateway assessment, DPIE have raised concerns that the planning proposal is inconsistent with the “retain and manage” objective for industrial lands in the Eastern City. DPIE have requested that the planning proposal demonstrate greater employment outcomes, including potential for incorporating “emerging industries, technology and innovation”.

Council engaged Atlas Urban Economics (Atlas) to:

1. Investigate the viability of different employment uses which are permissible in the B1 Neighbourhood Centre zone.
2. Comment on the appropriateness of including “emerging industries, technology and innovation” employment at the Site.
3. Make recommendations to optimise employment outcomes on the Site and to ensure sustainability of those outcomes.

Atlas confirmed:

- *Commercial Occupiers* - Whilst future development of the Site will go some way to improving the amenity of the local area, the Site’s location does not lend itself to attracting significant interest from commercial occupiers. This is largely attributed to its lack of proximity to different modes of public transport and limited critical mass.

Conversely, small-scale commercial uses with a population-serving focus (e.g. accountants, lawyers, tutors, etc) would be better suited at the Site as their locational requirements are more closely aligned to those of traditional retail

uses. These small-scale commercial occupiers broadly align with the definition of 'business premises' in the CBLEP 2013.

- *Retail Occupiers* - The Site is well-positioned to accommodate the scale and mix of retail uses outlined in the planning proposal. The local catchment has a well-established, affluent population with no existing retail offerings within walking distance.
- *Industrial and Urban Services Occupiers* - Both the Sydney Eastern Planning Panel and DPIE recognise that the Site is not suitable for many industrial activities – a reflection of its location within an existing low-density residential neighbourhood and the nature of the surrounding local road network which is not conducive to large and frequent heavy truck movements. There is a recognition that smaller scale industrial uses are better suited at the Site.
- *Emerging Industries* - The assessment of emerging industries suggests that sectors including urban services (part), health care and allied health, and food and beverage manufacturing would be well-suited at the Site. The Site lacks the locational requirements needed to attract and retain other emerging sectors such as large-scale food and grocery distribution and integrated logistics, pharmaceutical and other forms of advanced manufacturing, data centres and/or co-working facilities.

Following an examination of several 'emerging/ high growth' industries, Atlas found:

...some urban services, health care/allied health services and food and beverage manufacturing are examples of high growth industries that would be well-suited to the Site. Other emerging industries, such as pharmaceutical/ advanced manufacturing are unlikely to be market supportable on the Site.

The minimum 10,000sqm of employment floorspace proposed on the Site is considered adequate. The planning proposal notes that around 3,000sqm to 3,500sqm of this is supportable as retail floorspace. A minimum of 3,000sqm is to be provided as light industrial floorspace. Artisanal food and beverage industries could form a key component of this 3,000sqm minimum.

A number of recommendations were made to ensure the functionality and longevity of industrial uses on the site:

- redistribute light industries within the Central Roasting Hall, primarily to be on the Lower and Upper ground floors.
- address the functional requirements (vertical circulation, service corridors, goods/ service lifts, back of house areas).

The review undertaken by Atlas was shared with the applicant, who provided:

- a revised concept plan and design statement that reconfigures the distribution of light industrial floor space within the site; and

- an economic impact assessment prepared by Hill PDA to estimate the number of jobs and contribution to gross regional product.

Urban services floorspace is now distributed on the Upper Ground level of the Central Roasting Hall (Building C6) and ground level of Buildings C7 and C8.

In addition to the above, we recommend:

- the draft Development Control Plan be amended to address the spatial needs of light industrial uses as well as detailed design considerations such as floor to ceiling height spans, loading docks and vehicle access/parking, vehicle circulation, waste disposal, storage and service areas/ corridors, etc.

This will ensure that the light industrial space is functional but also ensures that future development is designed to minimise land use conflicts between different uses on the site.

- a local clause be introduced in the *Canada Bay Local Environmental Plan 2013* to require light industrial floor space to be located on the ground or upper ground floors.

This approach is consistent with Division 5 of *Sydney Local Environmental Plan 2012* that has a number of site-specific provisions. These provisions bear similarity to the Bushells site, in that they deal with land use vertically. As an example, clause 6.32 (505-523 George St) precludes residential accommodation in the podium and clause 6.41 (7-15 Randle St) specifies certain uses for the two lowest levels of the building.

The changes will ensure the longevity/ability of the light industrial space to be sustainable from a commercial and planning perspective and may be imposed as a condition of a Gateway Determination.

We trust that this letter and the attached documents address the matters raised by the Department and demonstrates the realistic and pragmatic opportunities to provide employment floor space on the site.

Should you have any enquiries in relation to this letter, please contact Paul Dewar, Manager Strategic Planning on 9911 6402.

Yours sincerely



Monica Cologna
Director, Community & Environmental Planning

Attachments

Land Use Advice – Atlas Urban Economics – 30 June 2021

Design Response – AJ+C – 16 July 2021

Revised Concept Plan – AJ+C – 20 July 2021

Economic Impact Assessment Addendum – Hill PDA – 12 May 2021

Draft Development Control Plan (to be amended)