



HARP STREET, CAMPSIE

Alignment with Draft Guiding Principles
Industrial Land Review

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1. INTRODUCTION AND CONTEXT

This submission has been prepared on behalf of Neetan Holding, and at the request for the City of Canterbury-Bankstown, to assist with the continued assessment of the Planning Proposal for 11 Harp Street, Campsite as an integrated health precinct.

The Greater Cities Commission in June 2022 released the *Industrial Lands 'Retain and Manage' Policy Review - Review Findings Paper*. This document established a number of guidelines principles:

"The Commission has developed a set of draft Guiding Principles to provide greater clarity on the management of 'Retain and Manage' lands. The eight draft Guiding Principles will support and assist the implementation of the Region Plan and City Plans. Council and proponents are encouraged to consider the draft Guiding Principles when discussing planning proposals within Industrial areas in the Policy area. The existing 'Retain and Manage' Policy still applies until the Six Cities Region Plan is adopted."

Draft Guiding Principles

- **Draft Guiding Principle 1. Securing capacity of industrial and urban services land**
Ensure there is sufficient industrial land and allowable floor area, of the right types, to meet the State's needs now and in the future.
- **Draft Guiding Principle 2. Supporting sustainability Policy and aspirations**
Industrial lands Policy should align with government environmental objectives and community expectations including minimising commute and delivery times, enabling efficient freight and logistics networks, and minimising environmental and social impacts.
- **Draft Guiding Principle 3. Optimising diverse supply chains supported by infrastructure**
Ensure that Greater Sydney's freight network (including trade gateways and corridors) and businesses' access to intermediate goods and services are efficient and resilient.
- **Draft Guiding Principle 4. Boosting economic activity to support current and emerging industries**
Strategically important and well-located industrial lands should support the co-location of businesses. Protecting Greater Sydney's and NSW's adaptive capacity to integrate both current and emerging industries can help secure Australia's current and future economic prosperity.
- **Draft Guiding Principle 5. Encouraging innovation**
Ensure industrial sites are adaptable to the evolving needs of the users, including the need for greater diversity and intensity of use and changing industry characteristics.
- **Draft Guiding Principle 6. Providing business certainty** Ensure consistency and clarity regarding the function of each industrial area, including their economic relationship with activity centres, to send clear market signals that foster business investment and productivity.
- **Draft Guiding Principle 7. Servicing population needs** Households and businesses should have access to the goods and services they need and access to local employment opportunities.
- **Draft Guiding Principle 8. Consideration of transition to alternative uses**
Transition of industrial lands to other uses, but only where the other seven draft Guiding Principles would not be compromised. If an industrial area (or part) is identified for possible transition to an alternative use, prioritisation must first be considered for other employment uses.

The Greater Cities Commission in March 2023 published a new information note, titled *Information Note – SP2023-1 Greater Sydney Industrial Lands Retain and Manage*.

This submission seeks to set out a demonstrated alignment between the proposal before Council, with both the Guidelines Principles of June 2022 and Information Note of March 2023 – to assist with the matter being presented to the Local Planning Policy and in turn Council meeting.

This document should be read in conjunction with the planning proposal package, including but not limited to the submitted economic review and health context review – both of which are provided as Appendices.

2. THE PROPOSAL AND SITE

THE INTENDED OUTCOME

The intended development outcome is an Allied health precinct which will provide invaluable community health infrastructure with the following associated land uses:

- Private Hospital including Rehabilitation Centre and Respite Care;
- Medical Centre and Specialist Services;
- Medical Research and Innovation Hub;
- Medi Hotel;
- Hospital-related Childcare Centre;
- Retail – Medical Support; and
- Publicly Accessible Park.

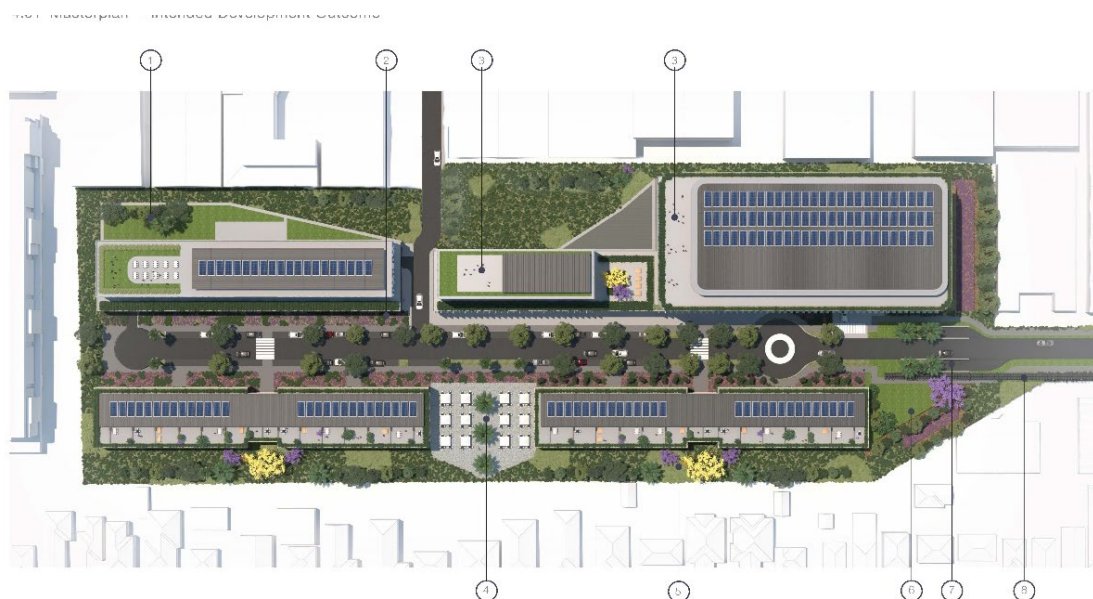
THE SITE

The site is located at 11 Harp Street, Campsie and is legally described as Lot 3 in DP270114. For the purposes of this planning proposal, Lot 1 in DP270114 is included for completeness as Lot 3 provides legal entitlement via an easement to use Lot 1 for vehicular access, services and egresses. Lot 3 in DP270114 has a total area of approximately 3.0 hectares. An aerial photograph is provided at **Figure 1**

Figure 1 - Aerial Map of Site



- Figure 2 – Intended Development – Proposed Master Plan



Source: Kann Finch

- Figure 3 – Intended Development – Proposed Perspective



3. STRATEGIC LAND USE PLANNING CONTEXT

3.1. SITE CONTEXT

The subject site is located south of Canterbury Road, just outside an area identified as the 'Campsie Station Precinct'. The Campsie Station Precinct sites within the Sydenham to Bankstown Urban Renewal Corridor. The site is located within the Canterbury-Bankstown Local Government Area (LGA) approximately 11km south-west of Sydney CBD, 6km west of Sydney Airport and 5km east of Bankstown (refer to Figure 6). Under the Greater Sydney Region Plan 'A Metropolis of Three Cities' the Canterbury Bankstown LGA is located within the South District of the Eastern Harbour City and is located within the Sydenham to Bankstown Urban Renewal Corridor.

The site is located on the south-western edge of Campsie and is just over 1km from the Campsie Town Centre located to the north-east. Campsie and the surrounding area are characterised by a range of smaller business types, and low-density residential housing with some 2-3 level residential flats fronting larger streets and roads. The built form generally consists of single and two storey housing typologies and three storey walk up flats. Housing types predominantly consist of block sizes that range from 400- 650sqm. New residential and commercial developments in the vicinity of the site such as Clemton Park and Emporia are generally 5-8 levels. Smaller / light industrial uses are located immediately adjacent to the site, with larger industrial units at nearby Kingsgrove. Figure 4 – Site Context



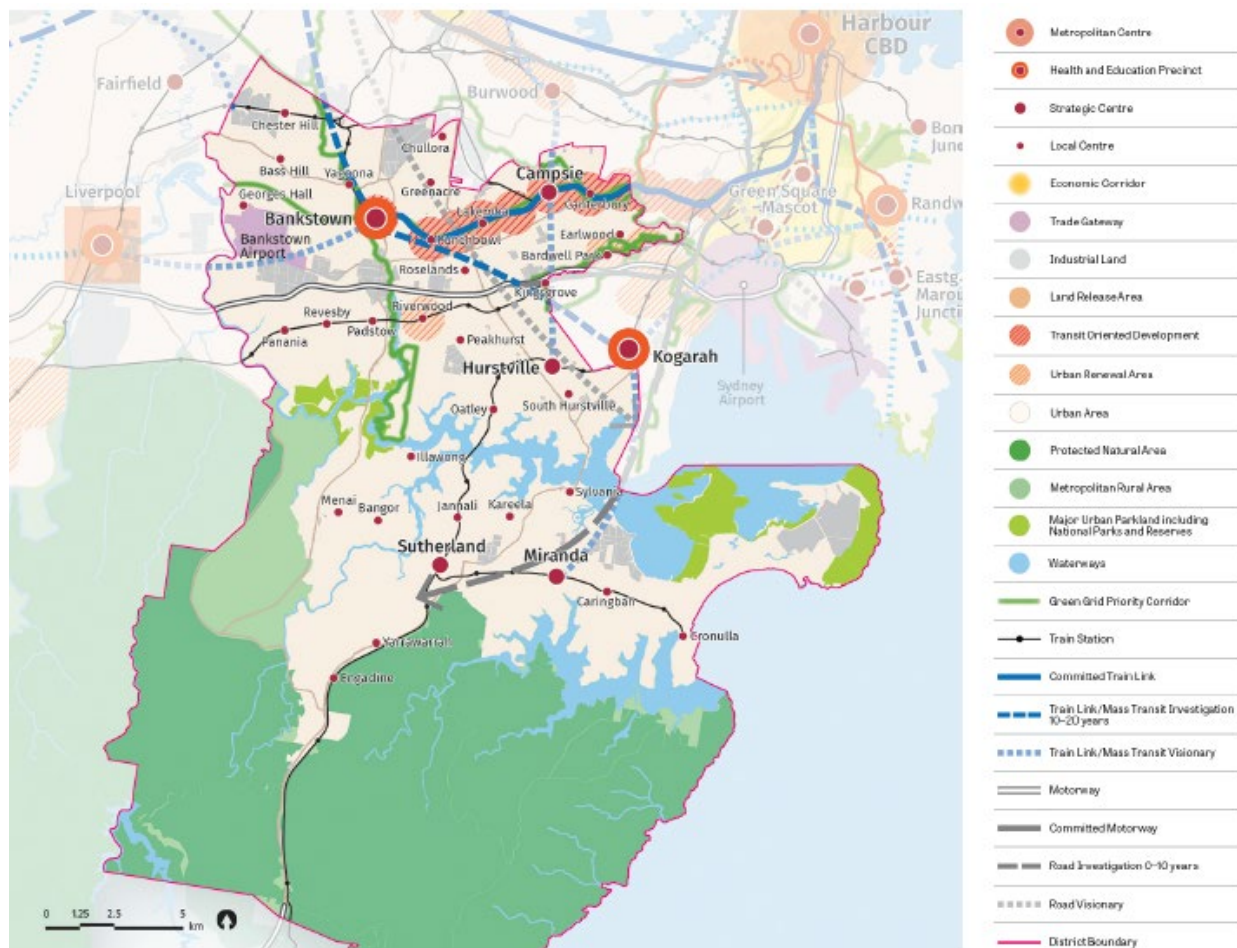
Source: Kann Finch

3.2. SOUTH DISTRICT PLAN

The South District Plan (District Plan) informs local strategic planning statements, Local Environmental Plans and the assessment of planning proposals in the southern part of the Eastern Harbour City (covering the local government areas of Canterbury-Bankstown, Georges River and Sutherland).

The District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the vision for Greater Sydney in the Greater Sydney Regional Plan and specifies planning priorities and actions relating to key areas of infrastructure and collaboration, liveability, productivity, sustainability and implementation. An overview of the South District Plan is provided at Figure 5 below.

Figure 5 – South District Plan



Source: NSW Department of Planning

The South District Plan describes the employment role of the Campsie as a civic and administrative hub. The Plan describes Bankstown having a mixture of retail, healthcare, community and civic services. The Plan notes the importance of supporting Hospital and allied health services in the Precinct.

The planning proposal would provide valuable services and social infrastructure to meet people's changing needs in the District as prioritised in the District Plan:

Integrated and targeted delivery of services and infrastructure is needed to support growth and respond to the different needs of population groups. Accessible local health services and regional health infrastructure such as hospitals are important for all people across the District.

The planning proposal is consistent with several Actions and Directions of the District Plan, namely:

- Action 34 - Strengthen Campsie through approaches that strengthen links to Canterbury Hospital and surrounding allied health services

- Direction 3 - A city for people would be monitored. Improved quality of life can be achieved by co-locating schools, recreation, transport, community and health facilities, social infrastructure and local services in walkable mixed-use places. A city for people will be measured against the outcomes achieved by improved access to local health, education, transport, recreation, social facilities and services.
- Direction 7 - Jobs and skills for the city. Greater Sydney's population growth needs to be supported by economic growth that enhances its productivity, export sectors and global competitiveness. Jobs and skills for the city will be measured against the outcomes achieved by increased business growth and investment, improved transport connections, economic agglomerations and target sectors.

Of relevance to this planning proposal are the South District Plan's directions for liveability. These include:

- Planning Priority S3: Providing services and social infrastructure to meet people's changing needs;
- Planning Priority S4: Fostering healthy, creative, culturally rich and socially connected communities;
- Planning Priority S5: Providing housing supply, choice and affordability with access to jobs and services;
- Planning Priority S6: Creating and renewing great places and local centres, and respecting the District's heritage;
- Planning Priority S8. Growing and investing in health and education precincts and Bankstown Airport trade gateway as economic catalysts for the District; and
- Planning Priority S9. Growing investment, business opportunities and jobs in strategic centres.

It is acknowledged that Planning Priority S10. Retaining and managing industrial and urban services land is not directly achieved by the Planning Proposal. **However, the District Plan notes that there is still undeveloped industrial land within the District:**

The South District has 1,666 hectares of industrial and urban services land, spread over 40 precincts. This represents approximately 12 per cent of Greater Sydney's total stock of industrial and urban services land. About eight per cent (146 hectares) is undeveloped, indicating strong demand for industrial and urban services land in the District.

The intended development outcome is at variance to the current light industrial zoning of the land. In the context of this planning priority, the following should be noted:

- A review of the planning framework for this local area has been foreshadowed in local strategic planning documents, related to the development of the Sunbeam site;
- Careful consideration has been given to existing and projected future employment opportunities;
- The site is located within close proximity to the Canterbury Hospital; and
- The physical characteristics of the site, including its site history, associated contamination and recommendations for on-going site management have been carefully considered.

Taking the above into consideration, there is still a large area of industrial land which is currently underutilised. Based on the Economic Impact Assessment attached at Appendix B, as of January 2018 there were 968 hectares of zoned industrial land in the Canterbury - Bankstown LGA, of which 31 hectares was undeveloped. The undeveloped land is estimated to be able to provide a 311-year supply of industrial land for the LGA. Given this planning proposal would only consume a small percentage of unutilised industrial land which would eventually be relocated, it is believed that Council should support the planning proposal on this basis.

This planning proposal reflects a place-based approach to the land use planning for the site and seeks to increase its development potential. It is consistent with the identified directions for liveability planning priorities in that it will provide for employment in an accessible urban environment close to social infrastructure. It provides for the urban renewal of the Campsie strategic centre as envisaged in the Plan and will assist in achieving the specified employment targets for the Canterbury-Bankstown LGA.

3.3. CONNECTIVE CITY 2036: CANTERBURY-BANKSTOWN LOCAL STRATEGIC PLANNING STATEMENT

LSPS are a new layer of strategic planning legislated by the Environmental Planning and Assessment Act 1979 (EP&A Act) introduced in March 2018. The introduction of LSPS is one recent initiative to shift to a strategic-led planning framework in NSW, and to reduce the demand for spot-rezoning proposals. Essentially, the LSPS is a district plan at a local government level.

The LSPS will set out:

- the 20-year vision for land use in the local area;
- the special characteristics which contribute to local identity;
- shared community values to be maintained and enhanced; and
- how growth and change will be managed into the future.

Informed by the Greater Sydney Region Plan, the South District Plan and Council's current suite of strategic documents, the LSPS will act as a unifying document for Council's strategic vision and shape future amendments to the current Canterbury Local Environmental Plan 2012 (CLEP).

The LSPS is intended to provide more certainty about Councils' future land use intentions. A council must consider its LSPS as part of the LEP making process. An LSPS that has been endorsed by the NSW Department of Planning, Industry and Environment (DPIE), will be part of the strategic merit test for a gateway determination under section 3.34 of the EP&A Act. To ensure that LEP amendments give effect to the direction expressed in an LSPS, Section 3.33 of the EP&A Act requires that justification is provided with a planning proposal to make or amend an LEP.

'Connective City 2036', is the Local Strategic Planning Statement (LSPS) prepared Canterbury-Bankstown Council and was submitted to the State Government for endorsement in early 2020. The purpose of the LSPS is to guide land use planning within the area over the next 20 years. The aims of the vision are outlined below:

Canterbury-Bankstown Council is required to deliver its LSPS by December 2021 and a Comprehensive LEP by June 2020. The Comprehensive LEP is to bring together the planning controls of the former Canterbury and Bankstown Councils into one Local Environmental Plan with supporting citywide controls, including a Development Control Plan and Contributions Plan. Council officers are currently finalising the background technical studies and investigations as identified under the Accelerated LEP Review Program Agreement. The technical studies include:

- Housing Strategy (which includes affordable housing)
- Employment Lands Strategy
- Transport Strategy
- Demographics
- Sustainability Analysis

Being aligned with both the South District Plan and Council's Community Strategic Plan, the planning proposal seeks to ensure a suitable planning framework for the development of a health precinct in a demonstrated suitable location. The proposal has:

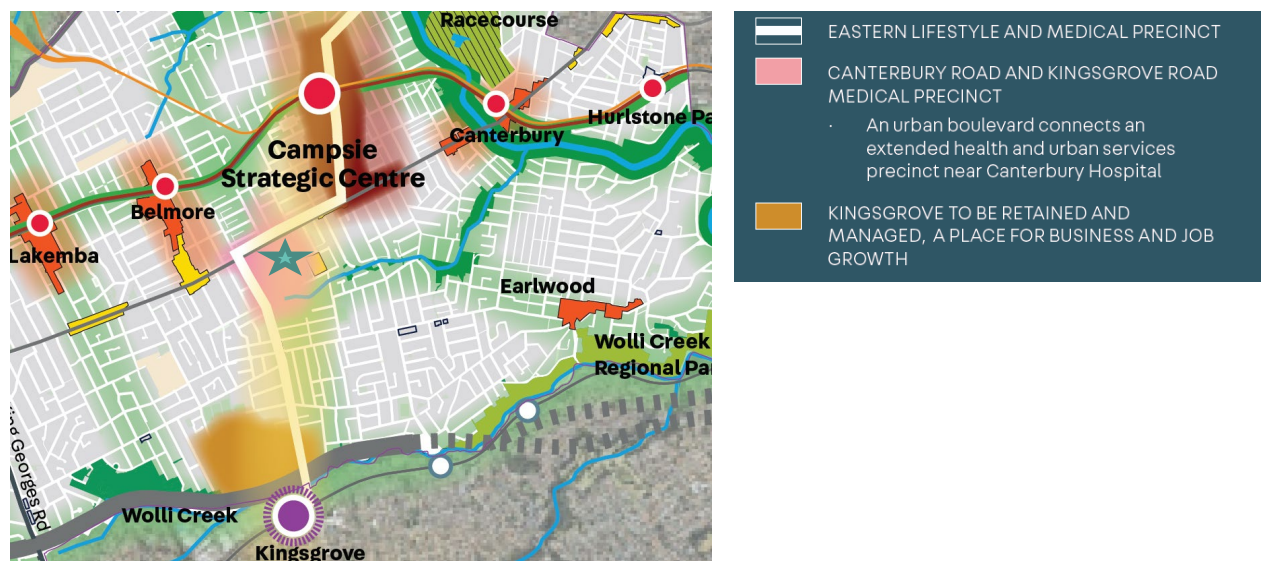
- (a) demonstrated suitable merit in the site's current context as a significant opportunity, and
- (b) demonstrated how it can work effectively in a future development scenario/context.

The site is identified as being part of the 'Eastern Lifestyle and Medical Precinct' from Campsie to Kingsgrove. The Precinct will provide high-quality public areas and civic, community and employment opportunities in the east of the LGA. The Precinct's evolution will seek to capitalise on the Canterbury hospital and expanded medical support uses. The intent is for Canterbury Road between Kingsgrove Road and Beamish Street will be an 'urban boulevard and medical destination.'

More specifically for the local area, the subject land forms part of the identified 'Eastern Lifestyle and Medical Precinct – Campsie to Kingsgrove'. The potential for the industrial land in the vicinity of Kingsgrove Road,

Canterbury Road and Harp Street has specifically been referenced, as having the potential to be transformed to create an extended hospital precinct and include allied health activities. The Strategy confirms that such a direction would remain consistent with the 'retain and manage' approach as set out in the District Plan. Improved road connectivity has been identified as part of the future direction.

Figure 6 – LSPS



Source: *Connective City 2036 – Local Strategic Planning Statement*

3.4. CANTERBURY-BANKSTOWN EMPLOYMENT LANDS STRATEGY

The **Canterbury-Bankstown Employment Lands Strategy** provides the basis for a planning framework that proactively guides future growth and support the delivery of employment to the Canterbury-Bankstown LGA.

Consistent with the South District Plan, Council will retain Canterbury-Bankstown's business and industrial lands to maintain capacity for future jobs. As a transitional arrangement, planning proposals that seek to rezone business and industrial lands for alternative uses that have already received a gateway determination will continue to be progressed. The renewal of employment lands for higher order employment uses will be encouraged to increase the density of jobs.

The Employment Lands Strategy was adopted was considered by Council in June 2020, post-exhibition. While there was acknowledgement of the overall need to consider the retention of existing industrial land, particularly around the Kingsgrove area,, the following were the both importantly recognised:

- The direction of Council to advance the Eastern Lifestyle and Medical Precinct, and
- The need to support a health and medical precinct around Canterbury Hospital were significant recognised.

This specific planning proposal was also acknowledged, recommended for consideration on a strategic merit basis.

4. STRATEGIC HEALTH CONTEXT

To inform the current planning proposal before Council, a specific 'local community health context review' was prepared for Neetan Investments – prepared by *Bernadette Keenan Health Projects Pty Ltd* and dated August 2020. As part of this submission relative to the Commission's Guiding Principles, it is relevant to note a number of key findings.

- **Aimed at improving the patient experience**
The Harp St Integrated Health Precinct will facilitate access to a comprehensive suite of multidisciplinary health care services in a contemporary setting, as close to home as possible for the community of Campsie. With the provision of acute care services, ambulatory care, community health, allied health, specialist consultation rooms and other key clinical support services all co-located, the health precinct can effectively be a 'one-stop-shop' for many residents who require access to health care services.
- **A very specific focus on 'person centred' care,**
Where patients, their families and their carers can be involved in how their care is accessed and delivered, the Harp St Integrated Health Precinct will provide an environment that is conducive to high quality care and best practice outcomes. Through a holistic approach, services in the precinct will promote health and wellbeing for all, provide a focus for out of hospital care where possible and will also facilitate connected, coordinated and collaborative care.
- **The precinct will cater for community members across the ages**
from early childhood to older persons and end of life care, and its design and approach will reflect the cultural diversity and needs experienced locally. This new development will also provide an opportunity to build business vibrancy, create significant social benefit and greater self-sufficiency and sustainability in Campsie

Themes	Aims, Objectives and Considerations
Patient experience	<ul style="list-style-type: none"> ▪ Care as close to home as possible ▪ Person centred care – patients, families and carers ▪ Greater access and choice ▪ Less invasive interventions ▪ Decreased length of stays ▪ Co-design with consumers ▪ Integrated care ▪ Less reliance on inpatient care
Population	<ul style="list-style-type: none"> ▪ 39% increase to 2031 ▪ 33% of Canterbury socially disadvantaged ▪ High ethnicity – 48% born overseas and 66% do not speak English at home ▪ High projected population increase for 65+yrs by 2031 ▪ 18.8% Canterbury resident activity flows to Concord or RPA Hospitals ▪ 16.8% activity flows to SESLHD or SWSLHD ▪ 10% of all SLHD births are attributed to Canterbury residents
SLHD direction / Canterbury Hospital	<ul style="list-style-type: none"> ▪ Decreased reliance on beds ▪ New models of care and clinical redesign ▪ Need for additional capacity to meet growing demand ▪ Integrated models of care and out of hospital care ▪ Improved ITC capability / digital health – high priority

Themes	Aims, Objectives and Considerations
	<ul style="list-style-type: none"> ▪ Commitment to evidence based research ▪ Redevelopment of Canterbury Hospital – high priority ▪ Need for Renal Dialysis in Canterbury ▪ Promotion of Breast Screen services in Canterbury ▪ Apparent gap in Gastroenterology, Interventional Cardiology, Mental Health, Stroke, Interventional Radiology, MRI and PET services ▪ Build stronger / strategic partnerships ▪ Apparent need for establishment of community-based health facilities to provide prevention early intervention and community-based care ▪ Concord Hospital provides significant support to Canterbury Hospital – back-up, beds and services including <ul style="list-style-type: none"> ▪ Radiology ▪ Nuclear Medicine ▪ Pathology ▪ Infectious Diseases ▪ Intensive Care ▪ Emergency Medicine ▪ Specialised Aged Care ▪ Rehabilitation ▪ Cancer ▪ Cardiology ▪ Endocrinology ▪ Colorectal Surgery ▪ Neurology ▪ Palliative Care Services ▪ Focus on culturally appropriate care for Aboriginal people ▪ Need for research and education infrastructure ▪ Focus on co-design with consumers
Private Health Insurance	<ul style="list-style-type: none"> ▪ Rates appear low – more robust work required with potential operators ▪ Socioeconomically disadvantaged population
	<ul style="list-style-type: none"> ▪ 30% of SLHD outflows for Canterbury residents are for private health services
Partnership opportunities	<ul style="list-style-type: none"> ▪ Opportunities for strong collaborative relationships with Canterbury Hospital and other SLHD facilities ▪ Provision of services to public hospitals e.g. elective surgery ▪ Complementary services including alternative therapies ▪ Clinical support services such as Pathology, Medical Imaging ▪ Opportunity to establish better links with complementary services – General Practice, Community Health, Child and family health,

Themes	Aims, Objectives and Considerations
Spaces	<ul style="list-style-type: none"> ▪ Opportunities to lease space to SLHD ▪ Need for specialist consultation spaces ▪ Need for Renal Dialysis space for SLHD ▪ Potential for locally based cancer therapy / clinics for SLHD ▪ Need for SLHD Community Health space ▪ More rigorous assessment of bed requirements, day only / overnight, service configurations ▪ Consider need for research infrastructure
Activity	<ul style="list-style-type: none"> ▪ Robust assessment of the most common service-related groups for hospitalisation across SLHD and opportunities that PHI patients may provide ▪ High needs – renal dialysis, chemotherapy services, mental health services
Suite of Services	<ul style="list-style-type: none"> ▪ Day Surgery including high volume short stay ▪ GP and Allied Health ▪ Imaging ▪ Endoscopy services ▪ Rehabilitation services ▪ Mental Health services ▪ Interventional Cardiology ▪ Interventional Radiology ▪ Hybrid ORs ▪ Orthopaedic services –ageing population / degenerative musculoskeletal disease ▪ Ophthalmology ▪ Pathology ▪ Pharmacy ▪ Ambulatory Care ▪ Complementary services including alternative therapies ▪ Allied health services
Workforce	<ul style="list-style-type: none"> ▪ Learning and development to build capacity and capability of individuals and teams ▪ Cross accreditation opportunities ▪ Potential academic links to support training and education ▪ Employer of choice
Research and Innovation	<ul style="list-style-type: none"> ▪ Potential academic links ▪ Committed to evidence based research ▪ Consider need for research facilities and strategic partnerships
Retail	<ul style="list-style-type: none"> ▪ Café ▪ Pharmacy ▪ Other

5. ALIGNMENT WITH DRAFT GUIDING PRINCIPLES

Draft Guiding Principle 1 - Securing capacity of industrial and urban services land

“Ensure there is sufficient industrial land and allowable floor area, of the right types, to meet the State’s needs now and in the future.”

Overall, economic and employment trends across NSW have been expected to have the following land use implications for the Canterbury-Bankstown LGA:

- A forecast need for 25,539 sq.m of health-related floorspace in the LGA each year to 2036
- A forecast need for 893 sq.m of industrial floorspace in the LGA each year to 2036
- An intensification of land use in the LGA, including mixed-use development and the co-location of compatible land uses.

The proposal for the subject site is aligned to the expected future employment landscape of the Canterbury-Bankstown LGA, by creating health-related employment floorspace to meet growing demand, in place of industrial zoned land that is forecast to receive lower demand than most other land uses.

As at January 2018, there were 968 hectares of zoned industrial land in the Canterbury Bankstown LGA, of which 31 hectares was undeveloped. This undeveloped land is estimated to be able to provide a 311-year supply of industrial land for the LGA, based on TfNSW annual employment projections and assuming an average utilisation of the land for general industrial use.

The proposed rezoning of the subject site will result in the withdrawal of 3 hectares of industrial zoned land from the LGA. This withdrawal is expected to be well accounted for within the LGA by 109,200 sq.m of vacant industrial floorspace (as at July 2019)

The proposal for the subject site is aligned to the expected future land use patterns of the LGA, as:

- Proposed and vacant industrial sites are expected to sustain a significant excess supply to 2036
- Beyond this, undeveloped industrial zoned land is expected to meet the long-term industrial needs of the LGA.

The proposal shall not compromise the achievement of this guiding principle.

Draft Guiding Principle 2. Supporting sustainability Policy and aspirations

“Industrial lands Policy should align with government environmental objectives and community expectations including minimising commute and delivery times, enabling efficient freight and logistics networks, and minimising environmental and social impacts.”

The proposal shall have negligible direct impact on the supply and demand for industrial lands within the local and regional context. Rather the proposed development for allied purposes is strategically aligned with:

- **Key recommendations set out in Council’s LSPS and associated Employment Lands Strategy**, with a key direction of Council to advance the Eastern Lifestyle and Medical Precinct. The need to support a health and medical precinct around Canterbury Hospital were significant recommendations.
- **Identified community health needs** - The precinct provides an opportunity to expand the existing health services provided locally so that local residents only travel for services that cannot be supported locally due to the highly specialised nature or complexity of care that is required. There will be a focus on working with key stakeholders to ensure that the infrastructure investment solution has also considered how digital technology and eHealth will be a key enabler to Support and explore alternatives to how care is best delivered to members of the community setting, ambulatory setting or at home

In addition to the above, the development of the site as an allied health precinct presents significant employment opportunities, as well as improved environmental outcomes through site remediation.

The proposal shall not compromise the achievement of this guiding principle.

Draft Guiding Principle 3. Optimising diverse supply chains supported by infrastructure

“Ensure that Greater Sydney’s freight network (including trade gateways and corridors) and businesses’ access to intermediate goods and services are efficient and resilient.”

The proposal shall have negligible direct impact on the supply and demand for industrial lands within the local and regional context. Furthermore, the site in its current industrial context is delivering minimal direct and indirect investment, trade and employment outcomes.

The proposal shall not compromise the achievement of this guiding principle.

Draft Guiding Principle 4. Boosting economic activity to support current and emerging industries

“Strategically important and well-located industrial lands should support the co-location of businesses. Protecting Greater Sydney’s and NSW’s adaptive capacity to integrate both current and emerging industries can help secure Australia’s current and future economic prosperity”

The proposed medical development at the subject site is estimated to generate 425 jobs on site under full operation, based on analysis provided by Neetan Investments. This job outcome represents:

- a 420-job uplift compared to the current site operations, accounting for 2% of the projected employment for the LGA to 2036
- 155 more jobs compared to an average general industrial use of the site.

During the construction phase of the project - 592 direct and indirect jobs created throughout the construction period, and a total gross value add (GVA) of \$69.6 million per annum

In 2016, there were more residents living in the Canterbury-Bankstown LGA (138,199) than there were available jobs (111,034). This indicates that many LGA residents are leaving the LGA to go to work each day. Further, the number of additional resident workers (13,670) was more than double the number of additional jobs (6,300) in the LGA between 2011 and 2016, showing that this trend is becoming more prevalent.

- Growth in resident workers in the five years to 2016 was most pronounced in the construction industry (3,115 additional resident workers) followed by the health care sector (2,582 additional residents), reflecting strong demand for workers in these industries.
- Health care and social services employees comprised the largest share of LGA residents at 11% in 2016. The 16,030 resident health care workers in 2016 compares to 13,170 health care jobs, indicating many of these residents work outside the LGA.
- Similarly to LGA jobs, the manufacturing industry experienced the largest decline of resident workers in the LGA between 2011 and 2016 of -3,595 workers (28% of all resident manufacturing workers in the LGA in 2011).
- There was a 29% decline in resident wholesale trade workers in the LGA from 2011 to 2016.

Council’s *Employment Land Strategy 2021*, and in turn the District Plan, has acknowledged the district effectively is transitioning from manufacturing to professional, high-tech, scientific and creative industries, and ancillary distribution and warehousing. Increasing the number of jobs in health and education and population-serving industries has been cited as particularly important as the District’s historically strong industrial base is in decline.

The proposal shall not compromise the achievement of this guiding principle.

Draft Guiding Principle 5. Encouraging innovation

“Ensure industrial sites are adaptable to the evolving needs of the users, including the need for greater diversity and intensity of use and changing industry characteristics.”

The site itself has not considered to be suitable for industrial purposes into the future, rather it has planned since at least as far back as 2009 to transition to an emerging health precinct following the closure of the former Sunbeam factory. Rather the opportunity (and community need) is there to see innovation achieved through a managed transition to health and related activities.

Given the area is in transition with significant new development occurring along Canterbury Road including the emergence of a new medical hub being formed around the existing Canterbury Hospital, it is considered that the proposed allied health precinct will form a strong mutual connection and complement the nearby Canterbury Hospital. There would be significant benefits from redeveloping isolated industrial land for high quality medical services, including technology research and innovation, generating employment. Further, the provision of invaluable new health infrastructure in the form of a hospital as well as valuable community services from hospital-related childcare centre will encourage additional employment opportunities within the area.

The proposal shall not compromise the achievement of this guiding principle.

Draft Guiding Principle 6. Providing business certainty

“Ensure consistency and clarity regarding the function of each industrial area, including their economic relationship with activity centres, to send clear market signals that foster business investment and productivity.”

Council's *Local Strategic Planning Statement – A Connected City, 2036*, has sought to confirm a clear strategic direction for this area and more specifically a managed transition across to an emerging health precinct. This is considered to be entirely aligned with the strategic direction established under the South District Plan – for increasing the number of jobs in the health, education and scientific and professional industries, as well as population-serving industries will underpin the District's economy.

The proposal is aligned with a planned, deliberate and managed transition of this site from a historical land uses. **The proposal shall not compromise the achievement of this guiding principle.**

Draft Guiding Principle 7. Servicing population needs

“Households and businesses should have access to the goods and services they need and access to local employment opportunities.”

As set out above, the proposed medical development at the subject site is estimated to generate 425 jobs on site under full operation, based on analysis provided by Neetan Investments. This job outcome represents:

- a 420-job uplift compared to the current site operations, accounting for 2% of the projected employment for the LGA to 2036
- 155 more jobs compared to an average general industrial use of the site.

The proposal shall not compromise the achievement of this guiding principle.

Draft Guiding Principle 8. Consideration of transition to alternative uses

*“Transition of industrial lands to other uses, but only where the other seven draft Guiding Principles would not be compromised. If an industrial area (or part) is identified for possible transition to an alternative use, prioritisation must first be considered for other **employment uses**.”*

The precinct has long been planned to transition

Towards 2032 – City of Canterbury Economic Development and Employment Strategy (Strategy), was prepared in 2009 for Council. It examined employment lands within Canterbury LGA and recommended economic and employment development strategies, with a 30-year time horizon. The following direction and priority action recommendations were provided:

- Precinct 1 - Strategy Direction – consider the future of this area for low-risk, medium density housing, medical related business and a small Neighbourhood centre, adjacent to light industry
- Action P 27 - ‘Redeveloping Harp Street and Canterbury Road — Restructure the Harp Street Precinct and surrounds to create a mixed use and medical precinct

The strategy specifically referenced the need for a review of the zoning regiment, following the (then) completion of the neighbourhood centre at the Sunbeam site.

Alignment with Council’s Local Strategic Planning Statement (LSPS)

The site is identified as being part of the ‘Eastern Lifestyle and Medical Precinct’ from Campsie to Kingsgrove. The Precinct will provide high-quality public areas and civic, community and employment opportunities in the east of the LGA. The Precinct’s evolution will seek to capitalise on the Canterbury hospital and expanded medical support uses. The intent is for Canterbury Road between Kingsgrove Road and Beamish Street will be an ‘urban boulevard and medical destination.’

More specifically for the local area, the subject land forms part of the identified ‘Eastern Lifestyle and Medical Precinct – Campsie to Kingsgrove’. The potential for the industrial land in the vicinity of Kingsgrove Road, Canterbury Road and Harp Street has specifically been referenced, as having the potential to be transformed to create an extended hospital precinct and include allied health activities. The Strategy confirms that such a direction would remain consistent with the ‘retain and manage’ approach as set out in the District Plan



Source: *Connective City 2036 – Local Strategic Planning Statement*

Consistent with South District Plan

The planning proposal is consistent with several Actions and Directions of the District Plan, namely:

- Action 34 - Strengthen Campsie through approaches that strengthen links to Canterbury Hospital and surrounding allied health services
- Direction 3 - A city for people would be monitored. Improved quality of life can be achieved by co-locating schools, recreation, transport, community and health facilities, social infrastructure and local services in walkable mixed-use places. A city for people will be measured against the outcomes achieved by improved access to local health, education, transport, recreation, social facilities and services.
- Direction 7 - Jobs and skills for the city. Greater Sydney's population growth needs to be supported by economic growth that enhances its productivity, export sectors and global competitiveness. Jobs and skills for the city will be measured against the outcomes achieved by increased business growth and investment, improved transport connections, economic agglomerations and target sectors.

Of particular relevance to this planning proposal are the South District Plan's directions for liveability. These include:

- Planning Priority S3: Providing services and social infrastructure to meet people's changing needs;
- Planning Priority S4: Fostering healthy, creative, culturally rich and socially connected communities;
- Planning Priority S5: Providing housing supply, choice and affordability with access to jobs and services;
- Planning Priority S6: Creating and renewing great places and local centres, and respecting the District's heritage;
- Planning Priority S8. Growing and investing in health and education precincts and Bankstown Airport trade gateway as economic catalysts for the District; and
- Planning Priority S9. Growing investment, business opportunities and jobs in strategic centres.

Strategic outcomes/alignment with 'retain and maintain' principle.

The outcomes sought by applying the 'retain and manage' principle would not be met if the site were to be retained as an Industrial Zone. Given the site characteristics and surrounding residential uses, it is unlikely that another specialised manufacturing use nor mix of other industrial uses would be suited for the site or accepted by surrounding residents. There is a unique opportunity to introduce a more appropriate mix of employment generating land uses that specifically align with the planned health precinct.

The 'retain and manage' principle fundamentally encourages a mix of economic outcomes that support the city and population. The Planning Proposal makes provision for health-related activities that support the local community and reflect the planned changing character and function of this area

6. ALIGNMENT WITH INFORMATION NOTE SP2023- GREATER SYDNEY INDUSTRIAL LANDS, RETAIN AND MANAGE

The Information Notes set out how the guiding principles from the GCC Review are to be considered moving forward. In turn, the Greater Sydney Region Plan (GSRP) establishes a vision, directions and objectives for the managed growth of Greater Sydney Region over the next 40 years. The GSRP:

- Informs the District and Local Plans and the assessment of planning proposals;
- Assists infrastructure planning and delivery to achieve place-based outcomes; and
- Informs the private sector and wider community of the governments' investment intentions.

The GSRP sets out the following Ten Directions:

- A city supported by infrastructure – Infrastructure supporting new developments
- A collaborative city – Working together to grow a Greater Sydney
- A city for people – Celebrating diversity and putting people at the heart of planning
- Housing the city – Giving people housing choices
- A city of great places – Designing places for people
- A well-connected city – Developing a more accessible and walkable city
- Jobs and skills for the city – Creating the conditions for a stronger economy
- A city in its landscape – Valuing green spaces and landscape
- An efficient city – Using resources wisely
- A resilient city – Adapting to a changing world

There is clearly strong alignment

The assessment concludes that the proposal is inconsistent with certain aspects of the 'retain and manage' industrial land principles, priorities, and actions. The site's unique characteristics, location and context – limit the site's suitability for industrial uses.

Priority E3 seeks to deliver social infrastructure that reflects the needs of the community now and in the future. The site is well serviced with existing transport services and location complementary to the existing Canterbury Hospital

The planning proposal states that the outcomes sought by the 'retain and manage' principle would not be achieved if the entirety of the site remained as an industrial (IN1) zone. The reason stated is that the suitability and appeal for industrial use on the site is constrained by its proximity to sensitive residential uses, existing site conditions.

Rather retaining the existing/historical industrial zone, alternative outcome, for an allied health precinct ultimately seeks to facilitate the following:

- the delivery of an alternative mix of uses which provided a mix of economic outcomes to support the city and its population,
- the maintenance of jobs, and
- a range of health services, which respond to the planning change for this area

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APPENDIX A

HEALTH CONTEXT REVIEW

APPENDIX B

ECONOMIC CONTEXT REVIEW

