



IRF25/1107

Gateway determination report – PP-2025-136

204 Hume Highway, Chullora

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Acknowledgment of Country

The Department of Planning, Housing and Infrastructure acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

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Table 1 Reports and plans supporting the proposal

Relevant reports and plans
Attachment A – Planning Proposal
Attachment B – Council Report & Resolution
Attachment C – Preliminary Site Investigation
Attachment D – Economic Impact Assessment
Attachment E – Heritage Impact Assessment
Attachment F – Traffic Impact Assessment

1 Planning proposal

1.1 Overview

Table 2 Planning proposal details

LGA	Strathfield
PPA	Strathfield Municipal Council
NUMBER	PP-2025-136
LEP TO BE AMENDED	Strathfield LEP 2012
ADDRESS	204 Hume Highway, Chullora
DESCRIPTION	Lot 1 DP547215
RECEIVED	19/05/2025
FILE NO.	IRF25/1107
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal

1.2 Objectives of planning proposal

The planning proposal (**Attachment A**) contains objectives and intended outcomes that adequately explain the intent of the proposal.

The objectives of the planning proposal are to facilitate the redevelopment of the subject site (Lot 1 DP547215) for the purposes of a service station and restaurants.

The planning proposal is accompanied by a reference scheme which illustrates the proposed redevelopment. See **Figure 1**.

The objectives of this planning proposal are clear and adequate.



Figure 1 Reference scheme for redevelopment of 204 Hume Highway, Chullora

1.3 Explanation of provisions

The planning proposal seeks to amend Schedule 1 of the Strathfield LEP 2012 to introduce “Service stations” and “Restaurants or cafes” as additional permitted uses (APUs) for the subject site.

In addition to the above amendments, Council outlined an intent to include a subclause limiting the total amount of gross floor area allocated to “Restaurants or cafes” and “Take away food and drink premises” across the site to no greater than 350sqm. This is discussed in a report to Council on the planning proposal (**Attachment B**), however the change is not reflected in Council’s resolution or submitted planning proposal. The Department supports the intended outcome, and a Gateway condition has been included to require the planning proposal be amended to outline this amendment.

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

1.4 Site description and surrounding area

The planning proposal is located at 204 Hume Highway, Chullora, and is legally referred to as Lot 1 DP547215. The site is located across two LGAs; Strathfield and Canterbury-Bankstown. The site has a land area of 3,996sqm and contains two primary access points, including one ingress point and one egress point, along the site’s frontage with the Hume Highway. The site has a generally flat topography, with gentle sloping from the west of the site to the east.

The site is zoned for E4 General Industrial land use and has historically been used as a car dealership. The site contains three buildings, various garden beds, a storage area occupied by used tyres and two storage tanks, and approximately seven storage containers. The ground of the

site is mostly covered in concrete, with a section of grass occupying the western boundary of the site. A sugarcane juice business currently operates on the site.

The site has two easement corridors. A large stormwater easement traverses the eastern boundary of the site in a south to north direction. A utilities corridor, including a gas line, electrical line, telecommunications line, and a stormwater drain traverses the southern boundary of the site in a west to east direction.

A state-heritage listed pressure tunnel and shafts (Listing No.01630) traverses the southern corner of the site. See **Figure 2**.



Figure 2 Subject site (source: eSpatial Viewer)

The subject site is located on the southern edge of an industrial precinct spanning the suburb of Chullora and the northern part of Greenacre. The site is bordered to the north and the east by a commercial storage facility and is bordered to the west by a logistics facility. The site is bound to the south by the Hume Highway, which is a state road managed by Transport for NSW (TfNSW).

Land opposite the site's southern frontage along the Hume Highway is zoned for E3 Productivity Support and is currently used for various purposes including car dealerships, hotel accommodation, a service station, and a fast-food establishment. See **Figure 3**.



Figure 3 Site context (source: Planning proposal)

1.5 Site spans two LGAs

The subject site of the proposal is located across both Canterbury-Bankstown and Strathfield LGAs. The E4 General Industrial land use zone applies across the entirety of the site. Although the Strathfield LEP prohibits “Service stations” and “Restaurant or cafes” within E4 zones, the Canterbury-Bankstown LEP 2023 classifies these land uses as permissible with consent. Consequently, amendments are only required to be made to the Strathfield LEP to achieve the desired outcomes of the planning proposal.

1.6 Mapping

The planning proposal seeks to amend the Additional Permitted Uses Map associated with the Strathfield LEP. The current and proposed Additional Permitted Uses Map associated with the Strathfield LEP are shown in **Figure 4** and **Figure 5** respectively.

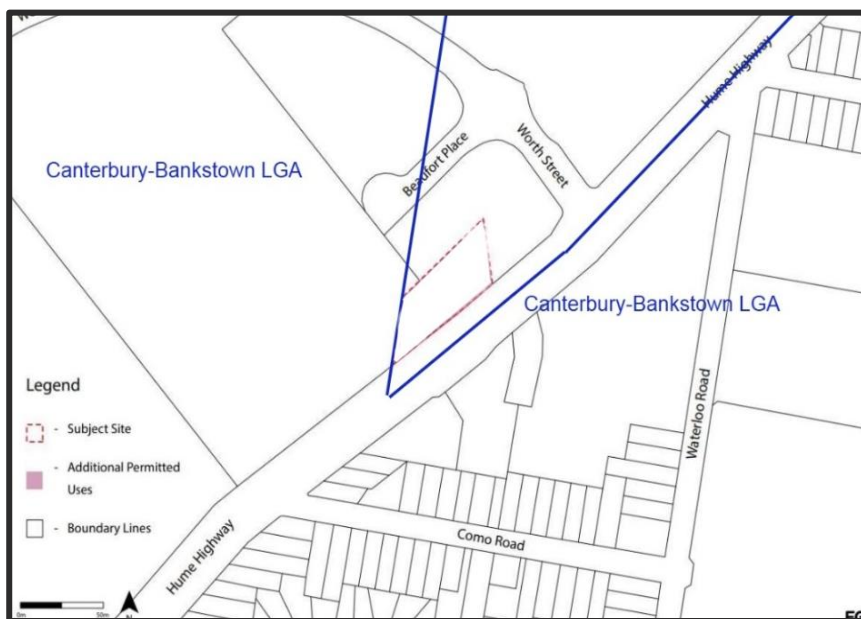


Figure 4 Existing Additional Permitted Uses Map

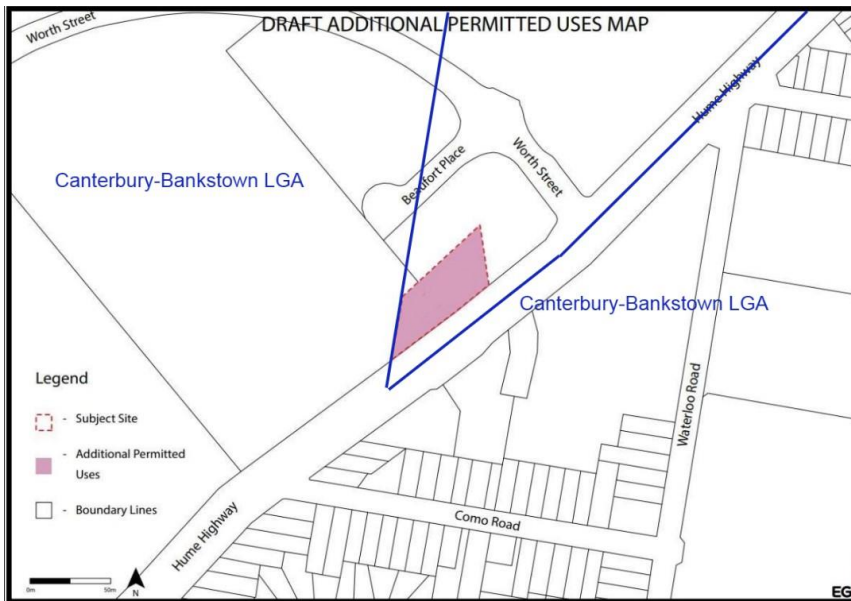


Figure 5 Proposed Additional Permitted Uses Map

1.7 Background

On 3 February 2021, Strathfield Municipal Council endorsed a proponent-led planning proposal which sought to introduce “Highway service centres” as an additional permitted use for the subject site. On 20 October 2022, the Department issued a Gateway determination for the proposal which determined that the planning proposal should not proceed to finalisation.

The Gateway determination was accompanied by a Gateway determination report, which identified the following key reasons why the proposal **should not** proceed:

- The proposal did not adequately demonstrate consistency with Section 9.1 Ministerial Directions;
- The proposal did not address how the amendment would have enabled redevelopment of the site, noting that “Highway service centres” would remain prohibited on the Canterbury-Bankstown portion of the site; and
- The strategic intention for the site, as indicated by reference scheme, included land uses that would be more suitably classified as a combination of “Service stations” and “Restaurants or cafés” uses rather than as a “Highway service centres”.

On 29 April 2025, Strathfield Municipal Council unanimously resolved to forward this planning proposal to the Department for Gateway determination. This proposal retains the reference scheme (**see Figure 1**) of the original PP, however, seeks to introduce “Service stations” and “Restaurant or cafes” as additional permitted uses for the subject site. The new planning proposal does not seek to introduce “Highway service centres” as an additional permitted use for the site.

2 Need for the planning proposal

Q1. Is the planning proposal a result of an assured local strategic planning statement, or Department approved local housing strategy, employment strategy or strategic study or report?

The planning proposal is not the result of a strategic study or report.

The need for the planning proposal is attributed to there being no service station on the northern side of the Hume Highway from West Yagoona until past the M4 junction. The proposal argues that it would facilitate an in-demand service which supports the industrial area of Chullora, the travelling public, and local community.

Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes, the planning proposal is the best means of achieving the objectives of the proposal.

While the Department acknowledges that similar planning outcomes could be achieved through land use rezoning, this approach would inadvertently provide permissibility for land uses unsuitable for the site. Therefore, establishing additional permitted uses is considered the best approach for achieving the intended outcome of the planning proposal.

3 Strategic assessment

3.1 Regional Plan

The Greater Sydney Region Plan – A Metropolis of Three Cities (the Region Plan), released in 2018, integrates land use, transport and infrastructure planning and sets a 40-year vision for Greater Sydney as a metropolis of three cities. The Region Plan contains objectives, strategies and actions which provide the strategic direction to manage growth and change across Greater Sydney over the next 20 years.

Under section 3.8 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) a planning proposal is to give effect to the relevant District Plan. By giving effect to the District Plan, the proposal is also consistent with the Regional Plan. Consistency with the District Plan is assessed in section 3.2 below.

3.2 District Plan

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

The planning proposal is consistent with the priorities for infrastructure and collaboration, liveability, productivity, and sustainability in the plan as outlined below.

The Department is satisfied the planning proposal gives effect to the District Plan in accordance with section 3.8 of the EP&A Act. The following table includes an assessment of the planning proposal against relevant directions and actions.

Table 5 District Plan assessment

District Plan Priorities	Justification
Priority E12 – Retaining and managing industrial and urban services land	<p>While the planning proposal would introduce new land uses on a site zoned for industrial uses, the proposal does not facilitate the conversion of any industrial land to an alternative zone. The Department notes both the objectives of the E4 zone within the Strathfield LEP and the objectives of the Strathfield LSPS and considers “Service stations” and “Restaurants or cafes” to be an appropriate form of permissible development for the subject site.</p> <p>The Department is satisfied that the proposal is consistent with Planning Priority E12.</p>

3.3 Local

The proposal states that it is consistent with the following local plans and endorsed strategies. It is also consistent with the strategic direction and objectives, as stated in the table below:

Table 6 Local strategic planning assessment

Local Strategies	Justification
Local Strategic Planning Statement	<p>Published in March 2020, the <i>Strathfield 2040 Local Strategic Planning Statement</i> (SLSPS) provides a 20-year vision explaining how land use planning will be used to respond to predicted housing, economic, and population trends within the LGA.</p> <p>The proposal is consistent with the planning priorities established within the SLSPS, particularly in relation to priorities 3 and 10.</p> <p>Priority 3 of the SLSPS aims to ensure that freight corridor and local servicing needs are met with minimal impact on neighbourhoods and centres. The proposal supports Priority 3 through enabling the development of an accessible refuelling point along an arterial road. The service station would be surrounded by the Chullora/Greenacre industrial area, located outside of nearby local centres.</p> <p>Priority 10 of the SLSPS aims to activate spaces within industrial lands through the provision of local urban services. The proposal supports Priority 10 through introducing service stations and restaurants/cafes as permissible uses for the subject site. The proposed amendment intends to increase the variety of local services offered to commuters, local workers and residents.</p>
Community Strategic Plan	<p>Published in June 2022, <i>Strathfield 2035</i> (SCSP) provides guidance for the alignment of Council's resources to meet the planning priorities of the Strathfield community.</p> <p>The proposal is consistent with the planning priorities established within the SCSP, particularly in relation to Goal 1.1 <i>sustainable growth supported by well-planned and accessible infrastructure and services</i>. The proposal supports Goal 1.1 through providing accessible commercial infrastructure to meet the refuelling needs of motorists, whilst delivering redevelopment that is sympathetic to the landscape character of surrounding industrial areas.</p>

3.4 Local planning panel (LPP) recommendation

On 11 April 2025, the planning proposal was considered by the Strathfield Local Planning Panel (LPP). The Strathfield LPP determined that the proposal held both strategic and site-specific merit and supported forwarding the proposal to the Department for Gateway assessment (**Attachment B**).

3.5 Section 9.1 Ministerial Directions

The planning proposal's consistency with relevant section 9.1 Directions is discussed below:

Table 7 9.1 Ministerial Direction assessment

Directions	Consistency	Reasons for Consistency or Inconsistency
1.4 Site Specific Provisions	Justifiably Inconsistent	<p>The objective of this direction is to discourage unnecessarily restrictive site-specific planning controls.</p> <p>The Department notes the intention to impose a 350sqm limit on the combined gross floor area allocated to “Restaurants or cafes” and “Take away food and drink premises” across the site.</p> <p>The intention of the provision would be to prevent the above uses from becoming dominant land uses on the site.</p> <p>The inconsistency with the direction is justified as it is considered minor significance.</p>
3.2 Heritage Conservation	Justifiably Inconsistent	<p>The objective of this direction is to conserve items containing heritage significance. This direction applies as the planning proposal seeks to introduce APUs on a site containing a state heritage item.</p> <p>As the planning proposal does not contain provisions to preserve the heritage item, the proposal is inconsistent with this direction.</p> <p>However, noting that the heritage item is protected under the NSW <i>Heritage Act 1977</i>, and the item is located underground, the Department considers the inconsistency with this direction to be justifiable. Any future development application would consider any impacts on the item.</p>
4.5 Acid Sulfate Soils	Justifiably Inconsistent	<p>This direction seeks to avoid adverse impacts from the use of land with a probability of containing acid sulfate soils.</p> <p>The planning proposal is supported by a Preliminary Site Investigation (Attachment C) which notes the site is identified as Class 5. Class 5 soils have the lowest probability of acid sulfate soils occurring and therefore the risk for adverse impacts are low.</p> <p>The Department notes that Strathfield LEP includes the standard Acid Sulfate Soils Clause which will ensure this matter can be further considered at the DA stage. As such, the Department considers the inconsistency with this Direction to be minor and justified.</p>
5.1 Integrating Land Use and Transport	Consistent	<p>The objective of this direction is to ensure land use planning remains consistent with the aims, objectives and principles of <i>Improving Transport Choice – Guidelines for planning and</i></p>

Directions	Consistency	Reasons for Consistency or Inconsistency
		<p><i>development and The Right Place for Business and Services – Planning Policy.</i></p> <p>The planning proposal is generally consistent with these guidelines.</p> <p>The Department is satisfied that the planning proposal is consistent with this direction.</p>
7.1 Employment Zones	Consistent	<p>The objective of this direction is to protect employment land in employment zones and encourage employment growth in suitable locations.</p> <p>The Department notes a previous planning proposal for the site was found to not sufficiently demonstrate consistency with this direction. It is noted that the planning proposal has since been amended and the uses on the site will be restricted in size. The planning proposal seeks to establish APUs which would enable employment opportunities on the subject site.</p> <p>The Department is satisfied that the planning proposal is consistent with this direction.</p>

3.6 State environmental planning policies (SEPPs)

The planning proposal is consistent with all relevant SEPPs as discussed in the table below.

Table 8 Assessment of planning proposal against relevant SEPPs

SEPPs	Consistency	Reasons for Consistency or Inconsistency
Biodiversity and Conservation 2021	Consistent	<p>In accordance with clause 2.9 of the SEPP, land within the planning proposal area is subject to vegetation management works under Part O of the Strathfield DCP 2005.</p> <p>The amendments established by planning proposal would not impede on the regulatory regime used to manage vegetation works on the subject site.</p> <p>The planning proposal is consistent with this SEPP.</p>
Resilience and Hazards 2021	Consistent	<p>“Service stations” are considered a potentially hazardous development as defined by the Resilience and Hazards SEPP.</p> <p>In accordance with Part 3 of the SEPP, any future development application seeking to develop a service station must provide consideration for the SEPP, including preparation of a preliminary hazard analysis.</p> <p>The planning proposal is consistent with this SEPP.</p>

SEPPs	Consistency	Reasons for Consistency or Inconsistency
Transport and Infrastructure 2021	Consistent	<p>The planning proposal seeks to apply APUs on a site that has frontage along the Hume Highway, which is categorised as a “classified road”.</p> <p>Consequently, any future redevelopment of the site must provide consideration for the traffic requirements established under clause 2.119 of the SEPP.</p> <p>The planning proposal is consistent with this SEPP.</p>

4 Site-specific assessment

4.1 Environmental

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

Table 9 Environmental impact assessment

Environmental Impact	Assessment
Built Form	<p>The planning proposal does not seek to change built form controls pertaining to this site. The future form of development will be subject to assessment through the Development Application process.</p>
Contamination & Hazards	<p>The planning proposal seeks to introduce two APUs to the site including “service stations” and “cafes or restaurants”.</p> <p>It is noted that the existing use for the site is a sugarcane juice business. The proposed APU for “cafes and restaurants” would result in a function and product output that is relatively comparable to the existing use of the site.</p> <p>Additionally, the planning proposal has been supported by a Preliminary Site Investigation (PSI) (Attachment C) which assesses the potential for contamination across the site. The PSI concludes that the subject site has a medium contamination risk and recommends that a detailed site investigation be commissioned prior to development.</p> <p>The Department acknowledges the contamination risks identified by the PSI. Considering the existing use of the site and the recommendations of the PSI, the Department is satisfied that the contamination issues identified can be addressed within the DA stage.</p> <p>Notwithstanding the above, permitting “service stations” as a land use would have the potential to exacerbate existing contamination risks and introduce new fire safety hazards and contamination risks on the site. Consequently, a gateway condition has been included within the Gateway determination to require consultation with Fire and Rescue NSW (FRNSW) and the NSW Environmental Protection Agency (EPA).</p>

4.2 Social and economic

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

Table 10 Social and economic impact assessment

Social and Economic Impact	Assessment
Employment	The planning proposal is supported by an Economic Impact Assessment (EIA) (Attachment D). The EIA projects that the redevelopment which the planning proposal would facilitate, is estimated to provide twenty full-time ongoing jobs. Current use of the site is estimated to provide 3-5 full-time jobs.
Heritage	<p>A state-heritage listed pressure tunnel and shafts (Listing No.01630) traverses the southern corner of the site (Figure 2). The state heritage item is afforded statutory protection under the NSW <i>Heritage Act 1977</i>. A Heritage Impact Assessment (HIA) (Attachment E) has been prepared to support the planning proposal. It is noted that the reference scheme accompanying the planning proposal indicates that the proposed redevelopment of the site would not directly impact the state-heritage item.</p> <p>To ensure that the subject site is capable of hosting the proposed APUs without compromising the integrity of the state heritage item, a condition has been included within the Gateway determination requiring consultation with Heritage NSW (HNSW).</p>
Market Competition	As identified by the supporting EIA (Attachment D), the planning proposal would facilitate improved market choice and increased market competitiveness across local food and petroleum industries.

4.3 Infrastructure

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

Table 3 Infrastructure impact assessment

Infrastructure Impact	Assessment
Traffic	<p>The subject site contains a single frontage which is located along the Hume Highway. The ingress and egress to the site adjoins the northern segment of the dual carriageway, which is only accessible by eastbound traffic.</p> <p>The planning proposal is supported by a Traffic Impact Assessment (TIA) (Attachment F), which provides consideration for the likely level of traffic generated by the proposed APUs for the site. The TIA projects that the APUs would result in an additional 125-190 vehicle trips every hour that would use the local road network. The increase in traffic generation is predicted to result in an average delay time of 7 seconds. This delay is classified as minor.</p> <p>The road corridor adjoining the subject site has a posted speed limit of 70km/h. It is noted that the increased traffic generation resulting from the proposed APUs may</p>

Infrastructure Impact	Assessment
	<p>result in an increased safety hazard. While the TIA does not provide analysis on the potential safety implications of increased traffic generation, the Department acknowledges that this issue can be resolved at the detailed design stage, should the site be redeveloped.</p> <p>Noting that the planning proposal facilitates increased traffic movements on a road corridor managed by TfNSW, a condition has been included within the Gateway determination to require consultation with TfNSW.</p>
Utilities	<p>The site has two easement corridors. A large stormwater easement traverses the eastern boundary of the site in a south to north direction. A utilities corridor, including a gas line, electrical line, telecommunications line, and a stormwater drain traverses the southern boundary of the site in a west to east direction.</p> <p>A condition has been included within the Gateway determination to require consultation with all relevant utility providers.</p>

5 Consultation

5.1 Community

The planning proposal is categorised as a standard under the LEP Making Guidelines (September 2022). Accordingly, a community consultation period of 20 working days is recommended and this forms part of the conditions to the Gateway determination.

5.2 Agencies

It is recommended the following agencies be consulted on the planning proposal and given 30 working days to comment:

- NSW Environmental Protection Authority (EPA)
- Fire and Rescue NSW (FRNSW)
- Heritage NSW (HNSW)
- Transport for NSW (TfNSW)
- Utility Providers

6 Timeframe

Council proposes a 7 month time frame to complete the LEP.

The LEP Plan Making Guidelines (August 2023) establishes maximum benchmark timeframes for planning proposal by category. This planning proposal is categorised as a standard

The Department recommends an LEP completion date of 10 April 2026 in line with its commitment to reducing processing times and with regard to the benchmark timeframes. A condition to the above effect is recommended in the Gateway determination.

It is recommended that if the gateway is supported it is accompanied by guidance for Council in relation to meeting key milestone dates to ensure the LEP is completed within the benchmark timeframes.

7 Local plan-making authority

Council has not requested delegation to be the Local Plan-Making authority.

Given that the changes sought by the planning proposal are of minor significance, the Department recommends that Council be authorised to be the local plan-making authority for this proposal.

8 Assessment summary

The planning proposal is supported to proceed with conditions for the following reasons:

- The proposed amendments will facilitate job creation on the subject site.
- The proposed amendments will enable the delivery of services to meet the needs of businesses and workers.
- The proposed amendments have strategic and site-specific merit. The discrepancy with Ministerial Directions 1.4 Site Specific Provisions, 3.2 Heritage Conservation and 4.5 Acid Sulfate Soils are justified.

9 Recommendation

It is recommended the delegate of the Secretary:

- Agree that inconsistencies with Ministerial Directions 1.4 Site Specific Provisions, 3.2 Heritage Conservation and 4.5 Acid Sulfate Soils are justified.

It is recommended the delegate of the Minister determine that the planning proposal should proceed subject to conditions.

The following conditions are recommended to be included on the Gateway determination:

1. Prior to community consultation the planning proposal is to be updated to:
 - Detail that gross floor area allocated to “Restaurants or cafes” and “Take away food and drink premises” across the site is proposed at no greater than 350sqm.
 - Include an updated project timeline that is consistent with the requirements stipulated under the LEP Making Guideline.
 - Reference the correct zoning for the greater site as located in both the Strathfield and Canterbury-Bankstown LGAs.
2. Consultation is required with the following public authorities:
 - NSW Environmental Protection Authority (EPA)
 - Fire and Rescue NSW (FRNSW)
 - Heritage NSW (HNSW)
 - Transport for NSW (TfNSW)
 - Utility Providers
3. Public exhibition is required under section 3.34(2)(c) of the Act as follows:
 - a) the planning proposal is categorised as standard as described in the Local Environmental Plan Making Guidelines (Department of Planning and Environment, 2023) and must be made available for community consultation for a minimum of 20 working days; and
 - b) the planning proposal authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with planning proposals as identified in Local

Environmental Plan Making Guidelines (Department of Planning and Environment, 2023).

4. Given the nature of the planning proposal, Council should be authorised to be the local plan making authority.
5. A public hearing is not required to be held into the matter by any person or body under section 3.34(2)(e) of the EP&A Act. This does not discharge Council from any obligation it may otherwise have to conduct a public hearing (for example, in response to a submission or if reclassifying land).
6. The timeframe for the LEP to be completed is on or before 10 April 2026

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16.06.25



19 June 2025

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