

PLANNING PROPOSAL REPORT

Sydney Fuels Site

204 Hume Hwy, CHULLORA

July 2025



Prepared By: Impetus Planning Pty Ltd

Client: EG Property Advisory

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SUMMARY OF THE PLANNING PROPOSAL

Applicant	
Contact Details	EG Property Advisory C/- Jonathon Hain — Project Manager jhain@eg.com.au
Site	
Site Address	204 Hume Highway, Chullora
Local Government Area (s)	Strathfield LGA Canterbury Bankstown LGA
Site details	Lot 1 DP547215
Site Area	3,962 m2 (approx.)
Current Land Use and Zoning	Temporary food truck business — 'ijuce' E4 Zone Strathfield LEP 2012 (partial, aprox 85%) E4 Zone Canterbury-Bankstown LEP 2023 (partial, aprox 15%)
Proposal	
Description of the Proposal	To add 'service station' and 'restaurant or cafe' as additional permitted land uses for the Site in Schedule 1 of the Strathfield Local Environmental Plan 2012 (and associated map)
Mapping	Map of the Site to support an amendment to Schedule 1 of Strathfield Local Environmental Plan 2012
Planning Authority	Strathfield Council
Engagement	
Councils, Agencies and Other Stakeholders	Strathfield Council, Canterbury-Bankstown Council, Department of Planning, Housing and Infrastructure

1.0 INTRODUCTION

This Planning Proposal report has been prepared by Impetus Planning Pty Ltd on behalf of EG Property Advisory (the applicant) for a planning proposal application with Strathfield Council for an amendment to Schedule 1 of the *Strathfield Local Environmental Plan 2012* (the Strathfield LEP) (and associated map), to permit ‘service station’ and ‘restaurant or café’ development on land located at 204 Hume Hwy, Chullora NSW 2190, more formally described as Lot 1 DP547215 (**the Site**).

The Site is within both Strathfield and Canterbury-Bankstown Local Government Areas and predominantly within the suburb of Greenacre, with a portion of the Site within Chullora. The Site is located mostly within the Strathfield LEP area, with a portion located within Chullora under the *Canterbury-Bankstown Local Environmental Plan 2023* (Canterbury-Bankstown LEP).

The Planning Proposal entails adding ‘service station’ and ‘restaurant or café’ as additional permitted land uses in Schedule 1 of the Strathfield LEP (and associated map), and consistent with the Gateway conditions for the proposal, the gross floor area allocated to “restaurants or cafes” and “take away food and drink premises” across the Site to be no greater than 350sqm of Gross Floor Area (GFA).

The proposal is consistent with the existing zoning for the Site under the Canterbury-Bankstown LEP where ‘service station’ is a form of development permitted with consent. Further, under Section 5.3 of the Strathfield LEP - ‘Development near zone boundaries’, the objectives of the clause provide for flexibility where the investigation of a site and its surrounding reveals that a use allowed on the other side of a zone boundary would enable a more logical and appropriate development of the Site and be compatible with the planning objectives and land uses for the adjoining zone. Consistent with Section 5.3 of the Strathfield LEP, the Planning Proposal seeks to permit service station and restaurant or café development across the entire Site, instead of just a portion of it. The Gateway conditions also require that the gross floor area for any restaurants, cafes or take-away food and drink premises is capped at 350sqm of GFA across the Site to prevent potential over-development of these land uses.

The Planning Proposal has been prepared in accordance with section 3.33 of the *Environmental Planning and Assessment Act 1979* (the EP&A Act) and the relevant Department of Planning Guidelines including the ‘*Local Environmental Plan Making Guideline*’ August 2023.

The Planning Proposal is supported by the following specialist consultant reports and documentation:

- Appendix A: Conceptual Drawings prepared by ‘TfA Project Group’

- Appendix B: Traffic Impact Assessment Report prepared by 'The Transport Planning Partnership, December 2025
- Appendix C: Social Impact Assessment prepared by 'Sarah George Consulting', November 2024
- Appendix D: Economic Impact Assessment prepared by 'GapMaps, January 2025'
- Appendix E: Preliminary Site Investigation prepared by 'EMM', December 2024
- Appendix F: Preliminary Historical Archaeological Assessment prepared by 'Sustainable Heritage', December 2024
- Appendix G: Draft 'Additional permitted Uses Map' – Strathfield LEP 2012 prepared by EG Property Advisory

This Planning Proposal report covers the following matters:

- Section 2: a site description including site characteristics and the context of the surrounding area;
- Section 3: a description of the existing statutory and strategic planning context;
- Section 4: the indicative development concept for the Site; and
- Section 5: an assessment of the proposal against the relevant instruments and plans.

2.0 THE SITE

2.1 Location and Site Description

The Site is approximately 3,962m² in area. The Site is located across two Council areas including the Strathfield Local Government Area (LGA) (approx. 85%) and the other 15% of the Site is located within Canterbury-Bankstown LGA. The Site has approximately 108 m of frontage on the Hume Highway and has dual access (left in, left out) driveways to the Hume Highway. This section of the Hume Highway has a speed limit of 70kmph.

The Site is located approximately 4 km east of Birrong Train Station and approximately 4.5 km south-west of Strathfield Train Station. The Site is located within an industrial precinct in Chullora that principally contains logistics facilities and warehousing with large floor plates. Low density residential development is located on the other side of the Hume Highway and the Chullora Marketplace is located across the other side of the Hume Highway to the east.

The Site is industrial zoned land, which was previously utilised as a car sales yard for over a decade, and then as a temporary COVID-19 Testing Clinic. The Site is currently being used for a temporary 'I-Juice' food truck business. Buildings, structures and fixtures currently on the Site include a former showroom in poor condition, storage containers and a large concrete paved hardstand area previously used for car yard purposes. See **Figures 1 and 2** below for details of the Site.



Figure 1: Location and Surrounding Land Uses Map - Source: Google Maps



Figure 2 – Subject Site as viewed from the Hume Highway – Source: Impetus Planning Pty Ltd

2.2 Surrounding context

The Site is located on the southern edge of an industrial area that generally supports large format warehousing and logistics facilities. The broader surrounds include a variety of land uses as detailed in **Table 1** below and **Figure 1** above.

Orientation from the Site	Description of Land Use
North	<ul style="list-style-type: none"> Land uses to the north include Transport for NSW infrastructure, industrial buildings and heavy rail including Pacific National's Intermodal facility. Further to the north is the Rookwood Cemetery, TAFE Lidcombe campus, Strathfield Golf Club and Mary Wade Correctional Centre. Directly adjoining the Site to the north is a Kennards Self Storage facility.
East	<ul style="list-style-type: none"> Across the Hume Highway to the east is a Suttons Car Dealership facility and the Malek Fahd Islamic School. Further east is additional industrial buildings and low-density residential dwellings.
South	<ul style="list-style-type: none"> To the South of the Site is a hotel, EG Ampol Service Station and Red Rooster restaurant. Further south is low density residential development, Chullora Marketplace and Chullora Public School.
West	<ul style="list-style-type: none"> West of the Site is large industrial facilities, including a Pacific National logistics service, and a Toyota dealership. Further east is the Sydney Water Potts Hill facility and Birrong Train Station

Table 1 – Surrounding Land Uses

2.2 Services and Utilities

The subject Site is adjacent to an industrial estate to the north and the following services and utilities are available either along the Site's frontage or within close proximity to the Site:

- telecommunications;
- stormwater;
- sewer;
- water; and
- electricity.

A Dial Before You Dig survey indicates that a high-pressure gas pipeline runs across the front of the Site in the road reserve. Future Development Applications will, as a matter of course, always also include full consultation with Jemena (the pipeline operator), before plans are finalised and approved.

3.0 STATUTORY & STRATEGIC PLANNING CONTEXT

3.1 Environmental Planning and Assessment (EP&A) Act 1979

The EP&A Act is the key piece of legislation that governs both strategic planning and development assessment within New South Wales. Section 3.33 of the EP&A Act outlines those provisions a planning proposal report must include such as the intended outcomes of the Planning Proposal instrument. The existing statutory and strategic settings for the Site are set out below. The matters relevant to Section 3.33 of the EP&A Act are discussed further in Section 5 of this report.

3.2 Existing Zoning and Permissibility for the Site

The Site is in both Strathfield (approximately 85%) and Canterbury Bankstown (approximately 15%) local government areas and there are two key environmental planning instruments that determine zoning and permissibility for the Site. These are:

- Strathfield Local Environmental Plan (2012); and
- Canterbury-Bankstown Local Environmental Plan (2023)

While the subject site is located across both Canterbury-Bankstown and Strathfield LGAs, **Figure 3** below shows that the E4 General Industrial land use zone applies across the entirety of the site. However, Strathfield LEP prohibits “Service stations” and “Restaurant or cafes” within E4 zones, while the Canterbury-Bankstown LEP 2023 classifies these land uses as permissible with consent. Consequently, amendments are required to be made to the Strathfield LEP 2012 to achieve the aimed outcome of the planning proposal, that is, to make these particular land uses permissible across the entire Site.

The indicative development concept for the Site as shown in **Appendix A** to this report, includes a ‘service station’ as well as ‘take away food and drink premises’ and/or ‘Restaurant or Café’. It is noted that service station development and restaurant or café development are currently prohibited under Strathfield LEP, whereas ‘take away food and drink premises’ are permitted with consent. It is further noted that both ‘service station’ development, ‘restaurant or café’ and ‘take away food and drink premises’ are permitted with consent under the Canterbury-Bankstown LEP. Existing land use permissibility matters for the Site are outlined in **Table 3** below.

Class of development	LEP and relevant zoning	Permissibility
Highway Service Centre	(E4 Zone) Strathfield LEP 2012	Prohibited (innominate)
	(E4 Zone) Canterbury -Bankstown LEP 2023	Prohibited (nominate)
Service Station	(E4 Zone) Strathfield LEP 2012	Prohibited (innominate)
	(E4 Zone) Canterbury -Bankstown LEP 2023	Permissible with consent (innominate)
Take Away Food and Drink Premises	(E4 Zone) Strathfield LEP 2012	Permissible with consent (nominate)
	(E4 Zone) Canterbury -Bankstown LEP 2023	Permissible with consent (nominate)
Food and Drink Premises	(E4 Zone) Strathfield LEP 2012	Prohibited (innominate)
	(E4 Zone) Canterbury -Bankstown LEP 2023	Permissible with consent (innominate)
Restaurant or Cafe	(E4 Zone) Strathfield LEP 2012	Prohibited (innominate)
	(E4 Zone) Canterbury -Bankstown LEP 2023	Permissible with consent (innominate)

Table 3 - Current Zoning and Permissible Land Uses

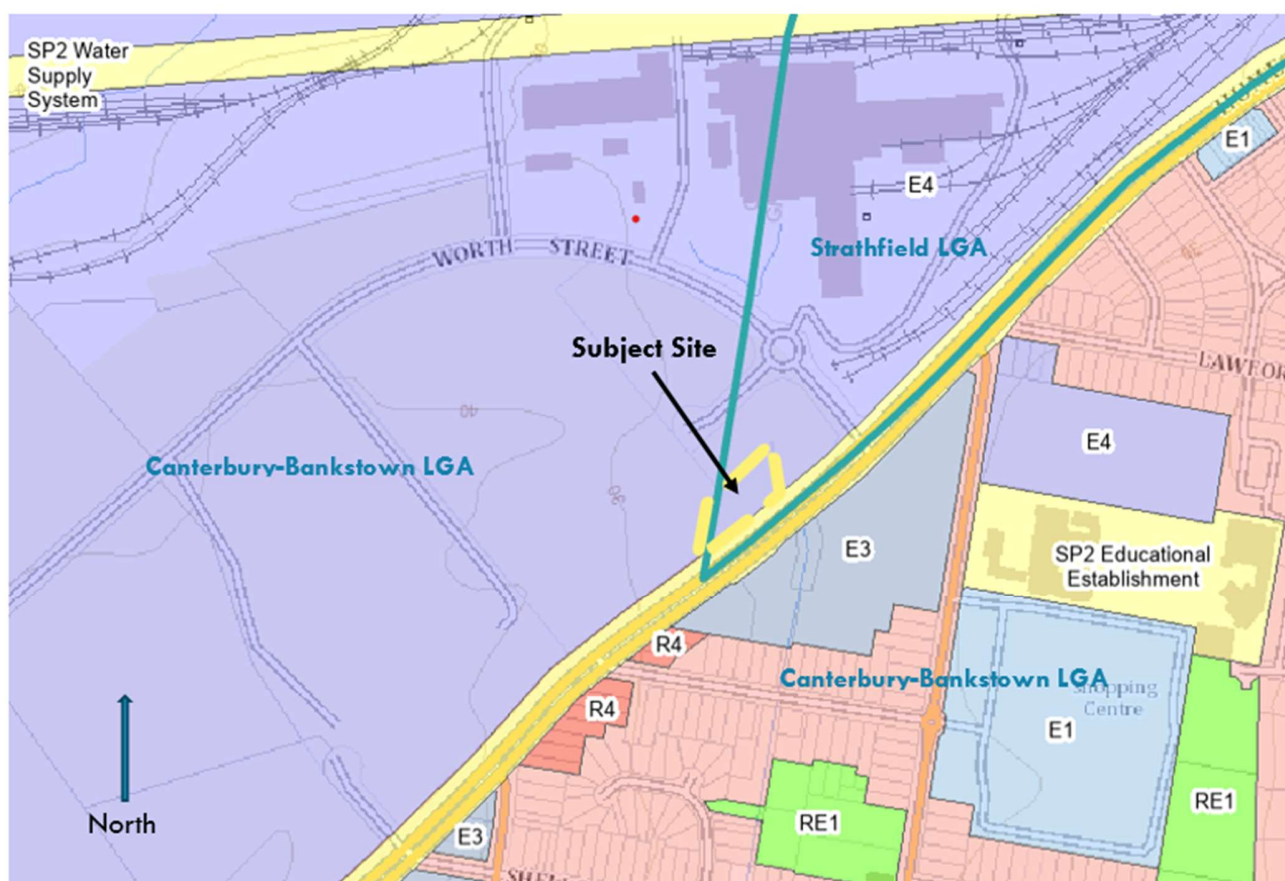


Figure 3: Current Zoning of the Site under Strathfield and Canterbury-Bankstown LEPs

Source: NSW Planning Portal - <https://www.planningportal.nsw.gov.au/>

3.2.1 - Strathfield Consolidated Development Control Plan (2005)

The Strathfield Consolidated Development Control Plan (DCP) 2005 provides detailed guidance

and provisions for the use of land. The controls in the DCP inform design and assessment of new development within the Strathfield LGA. Part D - Industrial Development would apply for any proposed development application lodged on the Site. The relevant provisions of the DCP for commercial development proposals within industrial zones are outlined in the excerpts below.

"Commercial premises and shops in an industrial zone shall demonstrate that they are:

- Ancillary to the approved industry; and/or*
 - Intended to serve persons occupied or employed in a land use otherwise permitted in the zone; and/or*
 - Mostly suited to the location in an industrial area by virtue of their operation (i.e. the premises must not be otherwise more appropriated located in a local commercial centre)."*
-

The Planning Proposal is considered consistent with these provisions as it seeks to permit 'service station' and 'restaurant or café' development over the entirety of the Site instead of just a portion of it. Further, the additional permitted land uses being sought are important urban services that are both ancillary and complimentary to the adjoining industrial zoned land. Any future service station and restaurant/café developments on the Site are intended to serve the workers that occupy the adjoining industrial premises, (along with the travelling public on the Hume Highway), and hence are best located in the industrial zone, as opposed to a local commercial centre.

3.2.2 - Canterbury-Bankstown Development Control Plan (2023)

The Site is also subject to the Canterbury Bankstown DCP 2023. The relevant chapters of the Canterbury Bankstown DCP 2023 applicable to any future development application on the Site are outlined in the excerpts below.

-
- Chapter 2 - Site Considerations;*
 - Chapter 3 - General Requirements; and*
 - Chapter 10 - Industrial Precincts.*

Chapter 10, Section 3 - Building Design of the DCP notes the following in relation to service station developments:

- 3.17 Service stations and vehicle sales or hire premises must provide a minimum 3m wide landscape buffer zone to the primary and secondary street frontages.*
 - 3.18 Service stations and vehicle sales or hire premises must locate an active frontage use (such as showroom, office, customer service area, convenience store or restaurant) along the primary and secondary street frontages,*
 - 3.19 Service stations and vehicles sales or hire premises must locate a vehicle repair station and associated car park at the basement level of the site."*
-

The indicative Development Concept for the Site outlined in Section 4 of this report and detailed further at **Appendix A** demonstrates consistency with the design requirements specified in Canterbury-

Bankstown's DCP 2023. For instance, the indicative Development Concept includes a landscape buffer and has an active street frontage on to the Hume Highway. Any future development application for a 'service station' development on the Site will need to respond to these detailed design controls.

3.3 – Strategic Planning Context

3.3.1 The Sydney Regional Plan – A Metropolis of Three Cities (2018)

A Metropolis of Three Cities – A Greater Sydney Region Plan A Metropolis of Three Cities – A Greater Sydney Region Plan (the Regional Plan) is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. Objective 23 of the Regional Plan is that 'industrial and urban services land is planned, retained and managed'. In the Regional Plan, the term 'urban services' is used to describe a wide range of industries that locate in cities. Urban services include a collection of industries that enable the city to develop and its businesses and residents to operate successfully. Hence, this Planning Proposal is to allow these important urban services: 'service station'; and 'café or restaurant' development, to be permissible over the entirety of the Site (instead of just a portion of it).

The development concept intended for the Site proposes a service station with ancillary uses, including a convenience store along with two drive-through food and drink premises. Service stations, drive through food and drink premises, cafés and restaurants are commonly considered important 'urban services' required to support the significant adjoining employment area and travelling public on the Hume Highway.

Further, the Economic Impact Assessment (see **Appendix D**), that supports this application concludes that there is a major gap in these sorts of 'urban services' on that part (and side) of the Hume Highway, with no service stations between the Shell at Yagoona and the 7-11 at Strathfield South (a distance of approximately 8.4 km). The Proposal therefore fills a gap in these important urban services. See Section 5 of this report for a detailed discussion on urban services and the 'retain and manage' action relative to the Site and Planning Proposal.

3.3.1 The Eastern City District Plan (2018) and South City District Plan (2018)

The Site is within two Local Government areas (Strathfield and Canterbury- Bankstown), and as a result, the Site is also covered by two District Plans: the *Eastern City District Plan*; and the *South District Plan*. The Eastern City District is at the centre of the Eastern Harbour City with the Harbour CBD, as its metropolitan centre. The approximate location of the Site is illustrated in **Figure 4** below as "Industrial Land", however Greenacre/Chullora are not noted as Local, Strategic or Metropolitan Centres.

There are 21 Planning Priorities that are part of the **Eastern City District Plan**. The most relevant Planning Priority is “E12 - Retaining and managing industrial and urban services land”. The Action from the Plan is to “Retain and manage industrial land and urban services land, in line with the Principles for managing industrial and urban services land in the Eastern City District by safeguarding all industrial zoned land from conversion to residential development, including conversion to mixed use zones. In updating local environmental plans, councils are to conduct a strategic review of industrial land.” From the Plan, Strathfield Council are listed as a Council who are responsible for this action. The Planning Proposal is considered consistent with the Eastern City District Plan and action, as it is not reducing the amount of industrially zoned land, rather applying consistent permissible uses across the entire site (instead of just a portion of it). Further, it is facilitating important urban services on the Site.

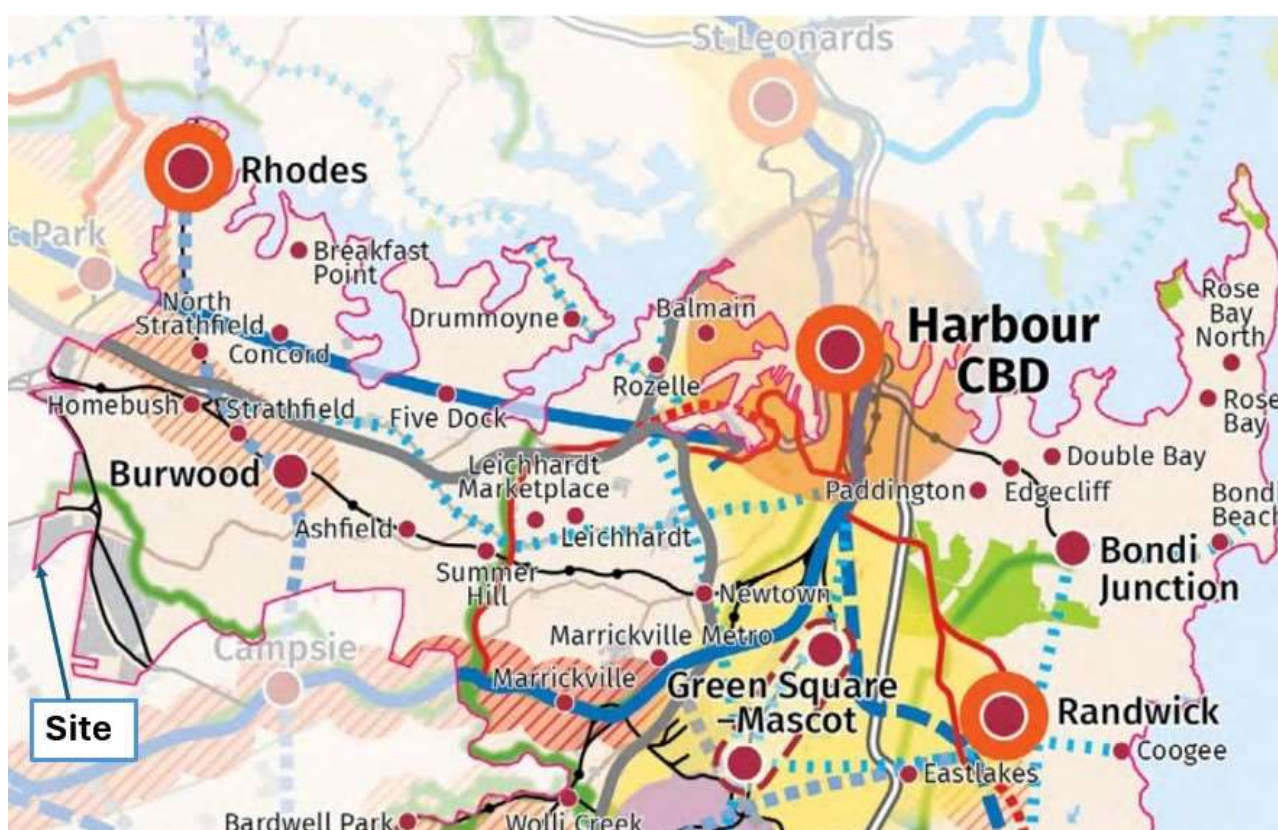


Figure 4: Site Location in the Eastern City District Plan (2018)

Source: <https://www.planning.nsw.gov.au/sites/default/files/2024-04/eastern-city-district-plan.pdf>

With both the Enfield and Chullora intermodal facilities in relatively close proximity to the Site, according to the **South District Plan**, “the predominant industrial sectors in Chullora, which is primarily focused on interstate freight movements rather than port-shuttle movements, are transport, postal and warehousing and food product manufacturing. These industries and movements represent about 20 percent of employment in the precinct, Utilities, creative industries and wholesale and retail trade are other

important activities in the precinct which is an important location for urban services". The location of the Site in the South District Plan is detailed in **Figure 5** below.

The South District Plan goes on further to say that "all existing industrial and urban services land should be safeguarded from competing pressures, especially residential and mixed-use zones. This approach retains this land for economic activities required for Greater Sydney's operation such as urban services.....The management of these lands should accommodate evolving business practices and changes in need for urban services from the surrounding community and businesses". There is one key action relevant to the Site in the South District Plan, Action 39 which reads exactly the same as the 'retain and manage' action E12 in the Eastern City District Plan.

See Section 5 of this report for a detailed discussion on the 'retain and manage' actions of the District Plans relative to the Site and Planning Proposal.

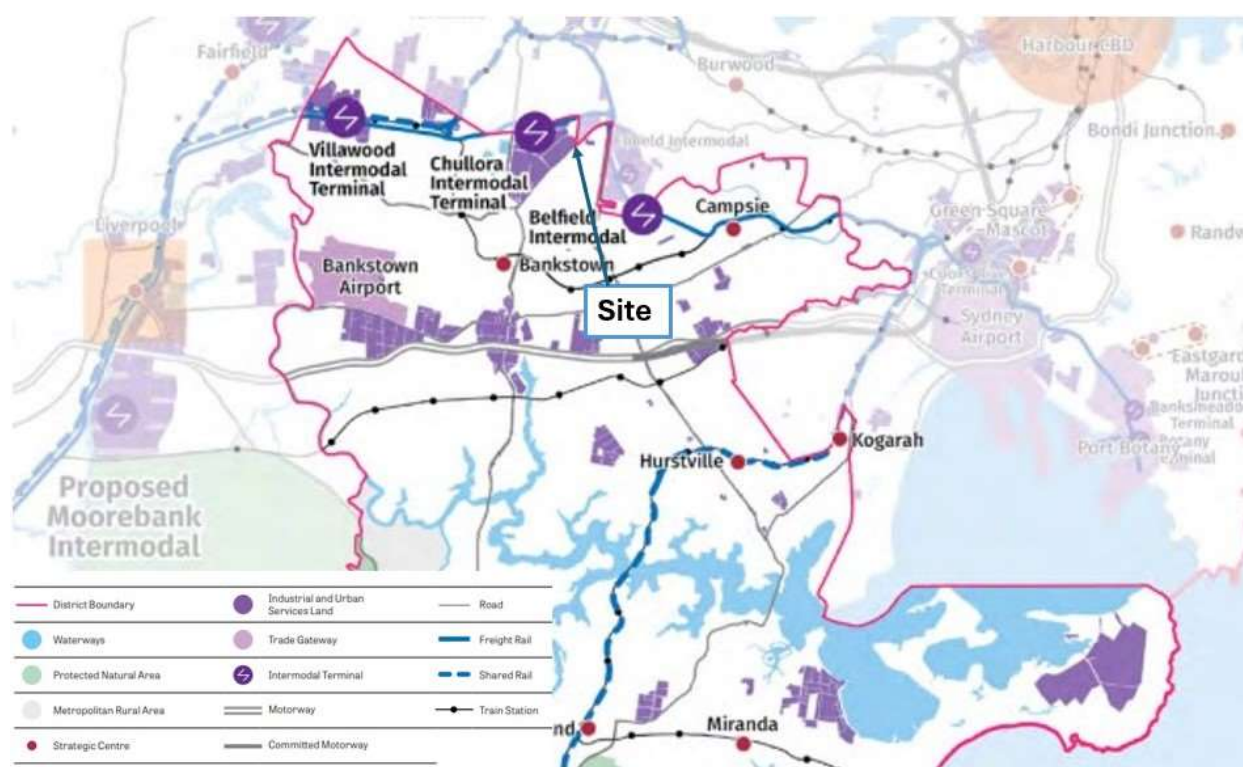


Figure 5: Site Location in the South District Plan (2018)

Source: <https://www.planning.nsw.gov.au/sites/default/files/2024-04/south-district-plan.pdf>

3.3.2 - Canterbury-Bankstown Connective City 2036 (2020) The Canterbury-Bankstown LSPS

The Local Strategic Planning Statement for Canterbury-Bankstown is known as the 'Canterbury Bankstown Connective City 2036'. The Statement outlines the aspirations for the future of the LGA for the next 20 years. The Site's location is noted in Figure 14 near the Council's proposed 20+ year

visionary mass transit/train station at Chullora. This train corridor would link from Padstow through Chullora to greater Parramatta.

The LSPS aims to retain service and employment lands to allow for the maintenance and creation of new and future jobs. Canterbury-Bankstown's LSPS also aims to deliver improvements that provide a more attractive and sought-after commercial environment, such as small-scale ancillary retail uses. This includes food and drink premises includes food and drink premises as one of the retail uses, as is aimed for in this submission for the land at Chullora. See Section 5 of this report for a detailed assessment of the Planning Proposal against relevant plans and strategies.

3.3.3 - Strathfield 2040, Local Strategic Planning Statement (LSPS) (2020)

The Strathfield 2040 LSPS outlines a long-term vision for Strathfield Council to guide land use planning decisions. Planning Priority 10 of the LSPS states that *"Industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighborhoods."* One of the actions for Strathfield Council is to prepare a local employment and productivity strategy (which is yet to be prepared), which will determine how industrial zoned land and freight routes will be protected. Additionally, Council aims to safeguard industrial and urban services land from conversion to residential development and/or mixed-use development. See Section 5 of this report for a detailed assessment of the Planning Proposal against relevant plans and documents.

3.4 - Heritage

It is noted that a Pressure Tunnel, Shaft and associated infrastructure is located at least 15 metres beneath the surface of the Site in the south-western corner, and is State Heritage listed under the Canterbury-Bankstown LEP. The location of the heritage item on the Site can be seen in **Figure 6** below.

According to the Preliminary Historical Archaeological Assessment at **Appendix F**, the pressure tunnel was constructed between 1921 and 1935 and passes under the suburbs of Chullora, Bankstown, Enfield, Canterbury, Ashfield, Marrickville, Erskinvill and Waterloo. The Tunnel is approximately 16 kilometres in length and the depth below ground level varies between 15 and 67 metres.

To facilitate the Development Concept for the Site detailed in Section 4 of this report, excavation of utilities and services would be to a maximum depth of 2 metres below the proposed canopy area, approximately 60 metres to the East of the heritage listed Tunnel. The Preliminary Historical Archaeological Assessment at **Appendix F** concludes that the proposed works do not extend to a depth that would impact the heritage listed Tunnel. However, the specialist report does recommend that a

structural engineer's assessment is undertaken as part of any development application for the Site. The report further recommends an 'Unexpected Finds Procedure' be implemented at the construction phase of the project.

It is also noted that the western edge of the Site within Canterbury-Bankstown LGA was previously affected by a local heritage listing of archaeological significance. This was for the site of the previous Royal Arms Inn (item A2 under Schedule 5 of *Bankstown Local Environmental Plan 2015*). However, The Bankstown LEP 2015 has since been repealed. Further, the archaeological site is not listed under the comprehensive Canterbury-Bankstown LEP 2023. A study associated with the adjacent Lot found that there was no archaeological potential associated with the Royal Arms Inn.

Further details can be found in the Preliminary Historical Archaeological Assessment prepared to support the Planning Proposal at **Appendix F**.

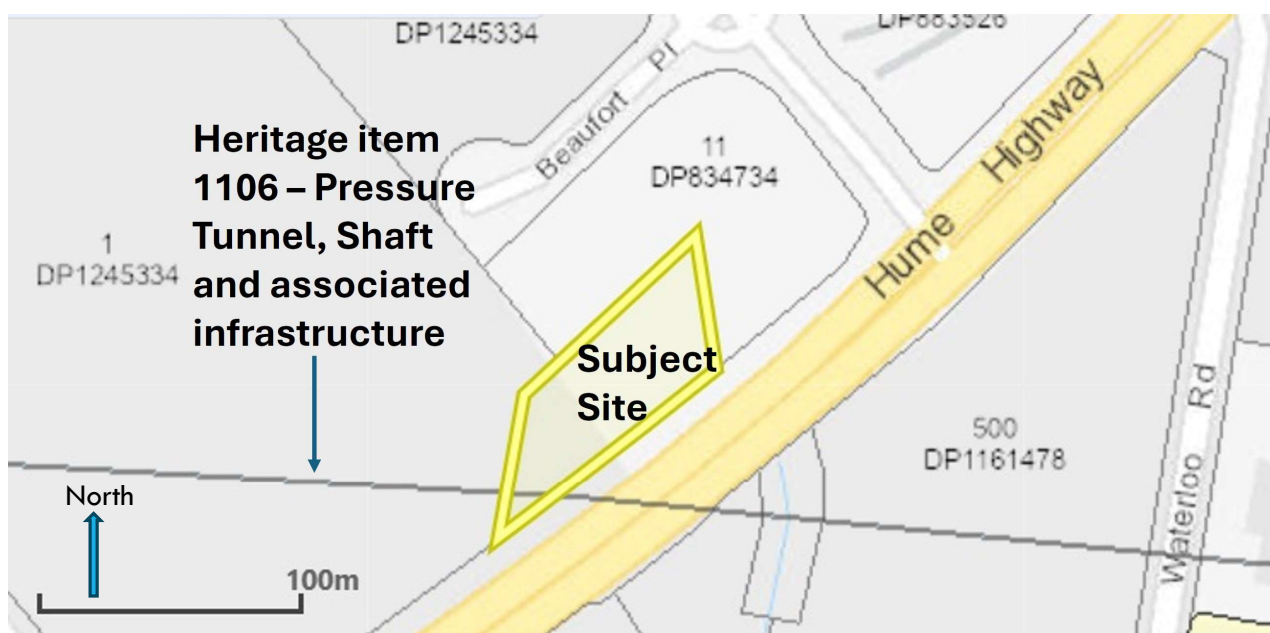


Figure 6 - Location of Heritage Item on the Site

source: State Heritage Inventory (<https://www.hms.heritage.nsw.gov.au>)

4.0 INDICATIVE DEVELOPMENT CONCEPT

4.1 Alternative Concept Plans Considered

A number of industrial and alternative land uses have been considered by the proponent for the Site. This includes warehousing and logistics facilities similar to those in the surrounding Chullora industrial estate. However, the relatively small nature of the Site is insufficient to support this kind of employment facility. This is further evidenced by the fact that the Site was utilised as a car sales yard for over a decade, not an industrial facility. The Site has also been considered for a self-storage facility, similar to the adjoining 'Kennards' operation, but there is currently no market interest in this type of development at this location.

A detailed Economic Impact Assessment has been prepared for the Site (**Appendix D**) to help confirm the optimal use for the land. The Hume Highway between Roberts Road and Rockwood Road/Stacey Street accommodates in the order of 50-000-60,000 vehicles per day, making it one of the busiest roads in the Strathfield and Canterbury-Bankstown LGAs. The Economic Impact Assessment identifies a major gap in service station facilities on this side of the Hume Highway, with no service stations between the 'Shell' at Yagoona and the '7-11' at Strathfield South, a distance of approximately 8.4 km.

The Economic Impact Assessment also considers the growth in the future residential population in the study area is projected to increase from around 29,200 to 33,200 between 2024 and 2039, which would equate to the need for around 0.7 – 1 additional service stations over this timeframe, in addition to existing demand of around 7-8 service stations. Separately, the Economic Impact Assessment also considers the worker population, with approximately 16,000 workers currently in the study area, including around 9,000-10,000 in the Chullora Industrial estate. The worker catchment alone for the Chullora industrial estate would be generating the demand equivalent to around 2 service stations.

Both the Economic Impact Assessment and Social Impact Assessment (**Appendix C**) for the Site conclude that the development concept (for a service station and associated convenience store along with drive-through food and drink premises) would substantially improve convenience and choice to both residents and workers in the study area. It would also create approximately 16 ongoing FTE jobs, over and above the existing employment on the Site, along with approximately 43 jobs during construction.

The proposed development concept is therefore considered the optimal use of the Site and would respond to a gap for these critical urban services on the northern side of the Hume Highway. The development concept is considered a suitable type of use for land fronting a major highway, and is already permitted on a portion of the Site. The development concept will provide an important supporting urban service to the Chullora industrial estate, adjoining residents along with the travelling public.

4.2 Description of the Development Concept

The overall intent of the development concept is to redevelop the existing car sales yard site to accommodate a service station development supported by two ancillary takeaway food and drink premises (or restaurants / cafes). The proposed development would utilise existing access from the Hume Highway, though the location of the 'left-in, left out' driveways would shift slightly).

In terms of buildings and structures, the proposed development concept would involve the construction of a new service station with an ancillary convenience store and two fast food restaurants (or restaurants / cafes). A full breakdown of development is as follows:

- site area: 3,962m²
- proposed service station convenience store: 251m² (approx. 100m² front-of-house (FOH), 151m² back-of-house (BOH))
- a drive-through fast food restaurant (Food & Drink 1) of 129m² (approx. 50m² FOH) and 21m² of outdoor dining
- a drive-through fast food restaurant (Food & Drink 2) of 203m² (approx. 100m² FOH)
- fuelling station canopy to service 6 fuel dispensers (or 12 light vehicles)
- 20 car parking spaces (including 2 accessible spaces).

The proposed Site layout is shown in **Figure 7** below and provided in **Appendix A**.

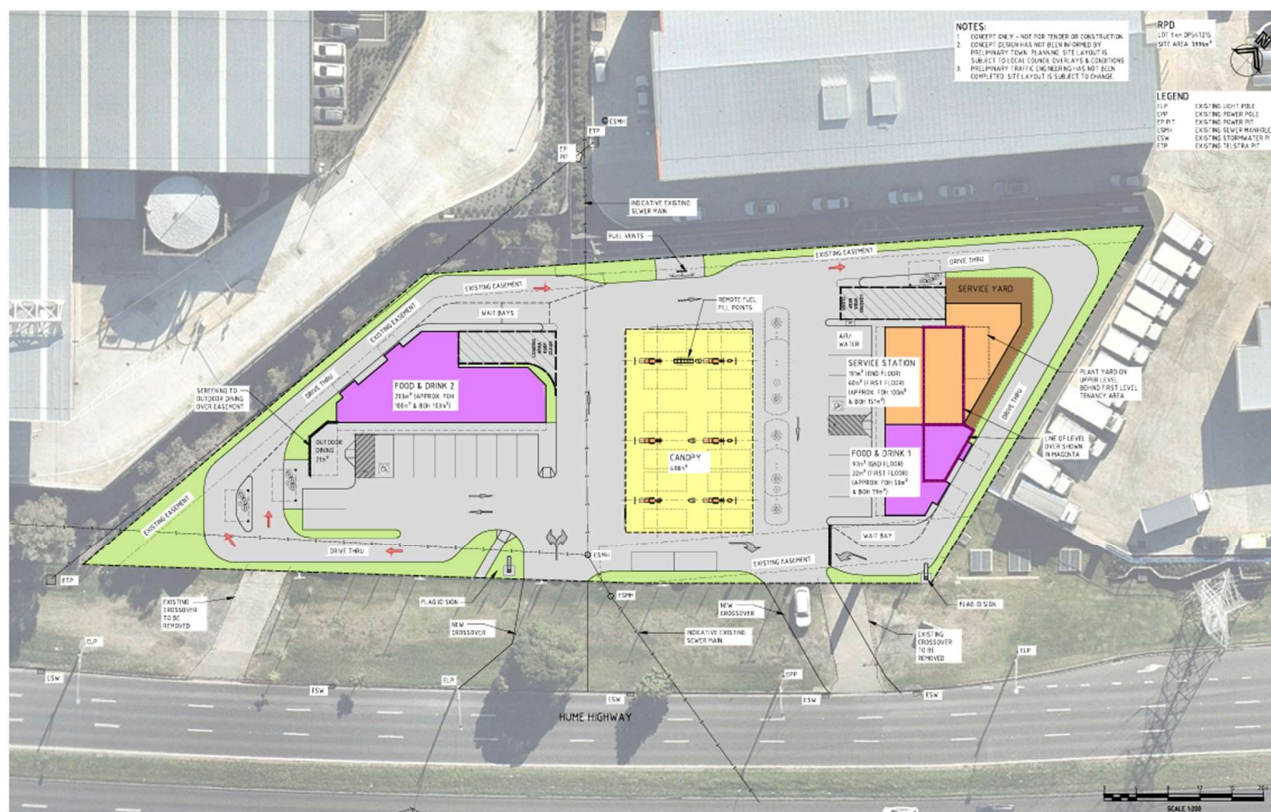


Figure 7 – Development Concept for the Site

Source: TfA c/o EG Property Advisory

4.3 Development Strategy

If the Planning Proposal is successful, the intention is to lodge a development application with Strathfield Council for the redevelopment of the Site generally consistent with the Development Concept outlined above.

It should be noted that as the Development Concept is worked up into a detailed development application, the drive-through Food & Drink 1 and / or Food and Drink 2 proposals may be changed to a restaurant or café or other forms of permissible development compatible with the service station use. This may include a car wash and/or small service station shop / convenience store.

The Development Application, following this Planning Proposal, will naturally be subject to a separate and comprehensive merit assessment by the relevant Planning Authority.

5.0 ASSESSMENT OF THE PLANNING PROPOSAL

The following section of this report addresses those matters a planning proposal must include that are outlined in Section 3.33 of the EP&A Act.

5.1 Objectives and intended outcome of the Proposed Instrument

The objective of the Planning Proposal is to make ‘service station’ and ‘restaurant’ or ‘café’ development permissible with consent over the entirety of the subject Site (instead of just the portion of the Site located in Canterbury-Bankstown LGA). Specifically, the Planning Proposal seeks to amend Schedule 1 of the Strathfield LEP (and associated additional permitted uses map) to add ‘service station’ along with ‘restaurant’ or ‘café’ as additional permitted land uses on the Site. Further, consistent with the Gateway conditions for the proposal, the gross floor area allocated to “restaurants or cafes” and “take away food and drink premises” across the Site will be no greater than 350sqm of GFA. This floor area restriction is to ensure there is no potential for over-development of these land uses on the Site.

The intended outcomes for the Planning Proposal include:

1. Maximising the Site’s strategic role within Strathfield Council’s Employment Zone by enabling ‘service station’ and ‘café or restaurant’ development to be permissible over the entirety of the Site. These are considered important urban services that complement the employment area;
2. Facilitating the delivery of important urban services that support the needs of the workers in the employment area in which the Site is located, as well as the travelling general public; and
3. Contributing to the rejuvenation, safety and security of the Hume Highway through the presence of commercial activity on the Site. This includes the landscaping and renewal of buildings at the Site, greatly enhancing the frontage to the Hume Highway.

5.2 Explanation of the provisions

The Planning Proposal seeks to amend Schedule 1 ‘Additional Permitted Uses’ of the Strathfield LEP along with an associated amendment to the ‘Additional Permitted Uses Map’. **Table 4** below outlines potential wording for the instrument. A draft ‘Additional Permitted Uses Map’ has also been prepared to support the Application. See Section 5.4 and **Appendix G** of this report.

Schedule 1 – Additional Permitted Uses	
Item XX	Use of certain land at 204 Hume Highway, Chullora
	(1) This clause applied to land at 204 Hume Highway, Chullora being Lot 1 DP547215.
	(2) Development for the purposes of ‘service station’ and ‘restaurant or café’ is permitted with development consent.
	(3) Development for the purposes of “restaurants or cafes” and “take away food and drink premises” will be no greater than 350 sqm of Gross Floor Area across the site.

Table 4 - Draft ‘Additional Permitted Uses’ wording to amend Schedule 1 of Strathfield LEP

5.3 Justification of Strategic and Site-Specific Merit

The following section of the report provides justification for the proposal in line with the ‘*Local Environmental Plan Making Guideline August 2023*’. In summary, the Site is 3,962m² in area, which is relatively small compared with the surrounding industrial sites that are predominantly large format warehousing and logistics facilities. Further, the Site has not been used for industrial purposes for over a decade and operated as a car sales yard for over 10 years.

The Economic Impact Assessment that supports this application at **Appendix D** concludes that there is a major gap in urban services on that side and part of the Hume Highway, with no service stations between the Shell at Yagoona and the 7-11 at Strathfield South (a distance of approximately 8.4 km). The Economic Impact Assessment suggests that high traffic volume roads such as the Hume Highway typically support service stations every few kilometres, on both sides of the road.

Further, both the Economic Impact Assessment and the Social Impact Assessment (**Appendix C**) conclude that the Proposal would result in positive social and economic impacts including employment opportunities during construction (21 FTE) and operation (16 FTE), convenience and choice for workers, residents and visitors having a service station on that side of the Hume Highway and improved security through the activation of the Site.

The Planning Proposal does not seek to reduce the amount of industrial land available, but rather seeks to make service station and restaurant or cafe development permissible over the entire Site, instead of just a portion of it. This is not inconsistent with the ‘retain and manage’ policy position of government. On the contrary, service stations, restaurants, cafés and takeaway food premises are all important urban services that complement employment areas such as Chullora.

Given that the Site is not large enough to support any large format warehousing or logistics facilities, as is the case for the surrounding properties, but benefits from direct access to the Hume Highway, the

optimal use of the Site has been assessed to be urban support services. Service station development on the Site is therefore highly appropriate and commercially viable, along with some form of food and drink premises (takeaway fast food and/or café or restaurant).

See **Table 5** below for more detail.

#	Question	Consideration
Section A – Need for the Planning Proposal		
1.	Is the planning proposal a result of an endorsed LSPS, strategic study, or report?	<ul style="list-style-type: none"> - While the Proposal is not a direct result of an action in either LSPS, the proposal is considered consistent with both Canterbury Bankstown and Strathfield LSPSs. - The Canterbury-Bankstown LSPS aims to retain service and employment lands to maintain capacity for future jobs. In addition, it seeks to investigate improvements that provide a more attractive commercial environment such as small-scale ancillary uses. The service station development (and takeaway food premises or restaurant /cafe) will provide convenient urban support services to industry & workers within the employment area, along with those travelling on the Hume Highway. - Similarly, the Strathfield LSPS aims to ensure that “industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighborhoods”. Under the actions, Council will prepare a local employment and productivity strategy which will determine strategies to protect industrial zoned land. The service station development will provide an important urban service and activate an otherwise underutilized Site. - Importantly, the proposal <u>does not</u> seek to reduce employment land, but rather seeks to provide consistent permitted land uses across the entirety of the Site.
2.	Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?	<ul style="list-style-type: none"> - The Planning Proposal is considered the best means of achieving the intended outcomes as it does not reduce employment zoned land, but rather seeks to apply consistent permissible land uses across the entirety of the Site, instead of just a portion. This rectifies an anomaly in the current permitted land uses on the Site that has likely occurred due to the Site’s unique situation of being split between two Local Government Areas, two key

#	Question	Consideration
		environmental planning instruments, two LSPS's and two District Plans.
Section B – Relationship to the Strategic Planning Framework		
3.	Will the planning proposal give effect to the objectives and actions of the applicable regional or district plan or strategy (including any exhibited draft plans or strategies)?	<ul style="list-style-type: none"> - Both the Regional Plan and the District Plan have an objective to see '<i>industrial and urban services land is planned, retained and managed</i>'. Importantly the Proposal does not seek to reduce the amount of industrial land available but rather seeks to make service station and restaurant or cafe development permissible over the entirety of the Site, instead of just a portion of it. - Service stations, cafes, restaurants and takeaway food premises are all considered important 'urban services' to support the adjoining employment area and passing traffic that are already permissible on a portion of the Site. The Proposal seeks to apply consistent permissibility across the Site to facilitate this important support service for industry and workers in the adjoining employment area along with the travelling public.
4.	Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?	<ul style="list-style-type: none"> - The Canterbury-Bankstown LSPS aims to retain service and employment lands to maintain capacity for future jobs. In addition, it seeks to investigate improvements that provide a more attractive commercial environment such as small-scale ancillary uses. The service station development (and takeaway food premises / café or restaurant) will provide convenient support services to industry & workers within the employment area, along with those travelling on the Hume Highway. - Similarly, the Strathfield LSPS aims to ensure that "industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighbourhoods". Under the actions, Council will prepare a local employment and productivity strategy which will determine strategies to protect industrial zoned land. The Planning Proposal is consistent with the LSPS. In particular, it is consistent with Planning Priority P10 of the LSPS that seeks to ensure that industrial land and precincts "deliver District and local urban services..." such as the service station and café or restaurant development proposed.
5.	Is the planning proposal consistent with any other	<ul style="list-style-type: none"> - Strathfield Council have yet to prepare a local employment and productivity strategy mentioned in its LSPS. An Economic Impact

#	Question	Consideration
	applicable State and Regional studies or strategies?	Assessment has been prepared to support the Proposal. The report concludes that there is a major gap in service stations on that side of the Hume Highway. The optimal use for the Site is for urban support services that form part of the Proposal.
6.	Is the planning proposal consistent with applicable SEPPs?	<p>State Environmental Planning Policy (Resilience and Hazards) 2021 – Chapter 3 – Hazardous or offensive development (formerly SEPP 33)</p> <ul style="list-style-type: none"> - The objectives of Chapter 3 of the SEPP include: to ensure that in determining whether a development is a hazardous or offensive industry, any measures proposed to be employed to reduce the impact of the development are taken into account, AND to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact. - Should the proponent be successful with this amendment to the Strathfield LEP, as per the development strategy outlined in Section 4.3, the next stage in the approval process would be to lodge a development application for the proposed service station development (along with a combination of takeaway food and drink premises or restaurant / cafe). - The service station component would involve the installation of underground, double-walled tanks, storing predominantly unleaded petroleum of varying grades and diesel along with charging points for electric vehicles. - Service station development (and associated underground petroleum storage systems) is a heavily regulated form of development in NSW. Any development application for a service station will be subject to rigorous environmental impact assessment against the SEPP and relevant Guidelines and policies including the Department's Hazardous Industry Advisory Papers (HIPAPs) and relevant EPA regulations and guidelines. - Importantly, the Proposal is considered consistent with the principles for strategic planning in HIPAP No: 10 – Land Use Safety Planning as service station development is already

#	Question	Consideration
		<p>permissible on a portion of the Site and is therefore an appropriate land use on the remainder of the Site; the Site is not located in close proximity to any environmentally sensitive areas; the Proposal is compatible with nearby industrial land uses; and the Proposal is located in suitable industrial land use zone, not adjoining any residential or other sensitive land uses.</p> <p>State Environmental Planning Policy (Transport and Infrastructure) 2021</p> <ul style="list-style-type: none"> - Service stations with heavy vehicle refuelling or maintenance services are a form of 'traffic generating development' under the SEPP. - The proposed development concept currently includes provision of 20 formal car parking spaces (including 2 accessible spaces) and can accommodate an additional 12 vehicles at the fuel pumps. The Traffic Impact Assessment supporting the Proposal (Appendix B) concludes that the Site's parking provisions are adequate. - In terms of cumulative traffic generation that would result from the Proposal (a service station & ancillary convenience store and two fast food premises) would result in 248 and 380 vehicle trips per hour to the morning and evening peak periods respectively, with 50% estimated to be pass by trips. This modelling is considered conservative and robust given a multi-purpose trip factor reduction has not been applied. The associated SIDRA modelling of the existing and anticipated future road network (year 2024) concludes that the development concept would have negligible impact on the road network. - Any development application for service station development and combination of takeaway food and drink, restaurant or café at the Site will include a full traffic impact assessment and referral to TfNSW. - In relation to utility services, the Site is currently serviced by all essential infrastructure (water, sewer, stormwater, electricity, telecommunications). Any development application for the Site will assess whether or not an upgrade of any of these services is required.

#	Question	Consideration
		<p>State Environmental Planning Policy (Industry and Employment) 2021 – Chapter 3 Advertising and Signage</p> <ul style="list-style-type: none"> - This policy and associated '<i>Transport Corridor Outdoor Advertising and Signage Guidelines – Assessing Development Applications Under SEPP 64</i>' 2017, will need to be considered in the design and assessment of the development application for the service station and take-away premises / restaurant or cafe.
7.	Is the planning proposal consistent with applicable Ministerial Directions (section 9.1 Directions) or key government priority?	<ul style="list-style-type: none"> - See Table 6 below
Section C – Environmental, Social and Economic Impact		
8.	Is there any likelihood that critical habitat or threatened species populations, or ecological communities, or their habitats, will be adversely affected because of the proposal?	<ul style="list-style-type: none"> - No. The Site is predominantly covered by concrete hard-stand as a result of its former use as a car sales yard. There is no important vegetation or critical habitat located on the Site or within close proximity to the Site.
9.	Are there any other likely environmental effects of the planning proposal and how are they proposed to be managed?	<ul style="list-style-type: none"> - Design, installation, operation and management of all fuel-related storage and dispensing equipment will be conducted in accordance with the relevant Regulations and Guidelines from the EPA and Department's Hazardous Industry Advisory Papers. - Appropriate stormwater management of all / any new impervious areas introduced as part of the proposal, including appropriate oily water separation treatment system under the canopy area - The Preliminary Historical Archaeological Assessment for the Site (Appendix F) concluded that that the proposed works do not extend to a depth that would impact the heritage listed Tunnel that crosses the south-western corner of the Site. However, the specialist report does recommend that a structural engineer's assessment is undertaken as part of any development application for the Site. The report further recommends an 'Unexpected Finds

#	Question	Consideration
		<p>Procedure' be implemented at the construction phase of the project.</p> <ul style="list-style-type: none"> - The Traffic Impact Assessment supporting this application (Appendix B) concludes that the development concept for a service station with ancillary convenience store and two fast food restaurants provides adequate car parking and will have negligible impact on the road network.
10.	Has the planning proposal adequately addressed any social and economic effects?	<ul style="list-style-type: none"> - The Proposal will facilitate the development of important urban support services, (i.e. service station and combination of fast food, café or restaurant development), for the adjoining industrial area which will lead to stronger economic outcome thereby benefiting the community. Specifically, the proposal is seen as playing an important complementary support role to the industrial area of Chullora by providing additional convenience and direct support to both workers within this area and servicing the wider travelling public. - Both the Economic Impact Assessment and Social Impact Assessments conclude that the Proposal would result in positive social and economic impacts including employment opportunities during construction (21 FTE) and operation (16 FTE), convenience and choice for workers, residents and visitors having a service station on that side of the Hume Highway and improved security through the activation of the Site. - Notwithstanding, the development will not be of a scale or type which could reasonably be considered to detrimentally impact upon the economic viability of the surrounding industrial area or surrounding business centre (Chullora Marketplace on the opposite side of the Hume Highway). - The Site is not currently used for industrial purposes, nor has it been for over 10 years. The Proposal will therefore contribute to the rejuvenation of the Hume Highway through landscaping and renewal of buildings and structures on the Site that has direct frontage to the Hume Highway.
Section D – Infrastructure (Local, State and Commonwealth)		

#	Question	Consideration
11.	Is there adequate public infrastructure for the planning proposal?	<ul style="list-style-type: none"> - The Proposal is considered to have adequate public infrastructure as it is already serviced by all the key utilities. Any upgrade to these facilities would be considered at the development application stage. A dial before you dig survey indicates there is a high-pressure gas pipeline in the road reserve that runs across the front of the Site. Any development application for works would include engagement with Jemena (the pipeline owner). - The proposed development concept includes provision of 20 formal car parking spaces (including 2 accessible spaces) and can accommodate an additional 12 vehicles informally at the fuel pumps. The Traffic Impact Assessment supporting the Proposal (Appendix B) concludes that the Site's parking provisions are adequate. - In terms of cumulative traffic generation that would result from the Proposal (a service station & ancillary convenience store and two fast food premises), it would result in 248 and 380 vehicle trips per hour to the morning and evening peak periods respectively, with 50% estimated to be pass-by trips. This modelling is considered conservative and robust given a multi-purpose trip factor reduction has not been applied. The associated SIDRA modelling of the existing and future road network (Year 2034) concludes that the development concept would have negligible impact on the road network. - Any development application for service station development and combination of takeaway food and drink, restaurant or café at the Site will include a full traffic impact assessment and referral to TfNSW.
Section E – State and Commonwealth Interests		
12.	What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?	<ul style="list-style-type: none"> - Not known.

Table 5 - Assessment of the Planning Proposal against the key questions in the Department's 'Local Environmental Plan Making Guideline August 2023'

Table 6 below provides analysis of the Planning Proposal consistency against the relevant Section 9.1 Directions.

Direction Title	Consideration
Focus Area 1: Planning Systems	
1.1 Implementation of Regional Plans	The Planning Proposal is considered consistent with the Regional Plan. Objective 23 of the Regional Plan is that 'industrial and urban services land is planned, retained and managed'. In the Regional Plan, the term 'urban services' is used to describe a wide range of industries that locate in cities. Urban services include a collection of industries that enable the city to develop and its businesses and residents to operate. The Proposal is to allow 'service station' and 'café or restaurant' development to be permissible over the entirety of the Site (instead of just a portion of it). Service stations, cafés, restaurants and take-away food and drink premises are all considered important urban services that will complement the adjoining Chullora employment area.
1.2. Development of Aboriginal Land Council Land	Not Applicable (NA)
1.3 Approval and Referral Requirements	The Planning Proposal does not introduce any new or additional concurrence, approval or referral requirements to State agencies or other bodies. Depending on the storage capacity, service station development is potentially a form of designated development (chemical storage). Service station development is already a permitted land use on a portion of the Site and is therefore an appropriate land use on the remainder of the Site. The Site is not located in close proximity to any environmentally sensitive areas; the Proposal is compatible with nearby industrial land uses; and the Proposal is located in suitable industrial land use zone, not adjoining any residential or other sensitive land uses.
1.4 Site-Specific Provisions	NA. There are no site-specific planning controls proposed as part of the Planning Proposal. The Proposal seeks to apply consistent land use permissibility across the Site.
1.4A Exclusion of Development Standards from Variation	NA. The Planning Proposal does not seek to introduce or alter an existing exclusion to Clause 4.6 (or equivalent provision).
Focus Area 1: Planning Systems – Place Based	

Direction Title	Consideration
1.5 – 1.22 – Various place-based strategies and plans	NA. There are no placed based strategies or plans relevant to the Planning Proposal.
Focus Area 2: Design and Place	
2.0 Design and Place	Any development application for the Site would need to consider the relevant provisions of the Design and Place SEPP that apply to commercial premises. The redevelopment of the Site would contribute to the rejuvenation of the Hume Highway through landscaping and new building works. The reactivation of the currently underutilised Site would also improve safety and security for the community.
Focus Area 3: Biodiversity and Conservation	
3.1 Conservation Zones	NA
3.2 Heritage Conservation	The objective of this Direction is to conserve items, areas, objects and places of environmental significance and indigenous heritage significance. There is a State heritage listed Pressure Tunnel and Shafts (SHR listing #01630) that traverses the south-western corner of the Site. The Preliminary Historical Archaeological Assessment report prepared to support the Planning Proposal (Appendix F) concludes that the proposed development concept works do not extend to a depth that would impact the heritage listed Tunnel. However, the specialist report does recommend that a structural engineer's assessment is undertaken as part of any development application for the Site. The report further recommends an 'Unexpected Finds Procedure' be implemented at the construction phase of the project. These management and mitigation measures are considered appropriate and will be further considered in the full merit assessment of the Proposal at the DA stage.
3.3 Sydney Drinking Water Catchments	NA
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	NA
3.5 Recreation Vehicle Areas	NA
3.6 Strategic Conservation Planning	NA
3.7 Public Bushland	NA
3.8 Willandra Lakes Region	NA

Direction Title	Consideration
3.9 Sydney Harbour Foreshores and Waterways Area	NA
3.10 Water Catchment Protection	NA
Focus Area 4: Resilience and Hazards	
4.1 Flooding	NA. The Site is not identified as Flood Prone Land.
4.2 Coastal Management	NA. The Site is not identifies as Environmentally Sensitive Land (coastal management or otherwise).
4.3 Planning for Bushfire Protection	NA. The Site is not identifies as Bush Fire Prone Land.
4.4 Remediation of Contaminated Land	The Proposal is considered consistent with this direction. The Preliminary Site Investigation Assessment that has been undertaken for the Site (Appendix E) reports that areas of potential contamination were identified to include existing buildings/structures including minor building waste in the form of bonded cement sheeting found in garden beds, former workshop area that is currently being used for storage, historic use of the western grassed area as a car park, fill material of unknown origin beneath the concrete hardstand and potential groundwater contamination from surrounding industrial areas. The report also identifies three potentially complete Sources-Pathways-Receptor (S-P-R) linkages, with medium contamination risk, for example, with the presence of aged or weathered bonded asbestos on the Site. Other S-P-R linkages were considered low risk. The Preliminary investigation report recommends a more detailed site investigation (including sampling) occur prior to works commencing on the Site. This would form part of any development application for the Site.
4.5 Acid Sulfate Soils	The Proposal is considered consistent with this direction. The Preliminary Site Investigation Assessment that has been undertaken for the Site (Appendix E) includes investigation of the likelihood for Acid Sulfate Soils. The land is identified as Class 5 on the Acid Sulfate Soils Map, of Strathfield LEP 2012. Acid Sulfate soils are not typically found in Class 5 areas.
4.6 Mine Subsidence and Unstable Land	NA
Focus Area 5: Transport and Infrastructure	
5.1 Integrating Land Use and Transport	The proposal is considered consistent with this Planning Direction as the Proposal would provide additional employment opportunities within

Direction Title	Consideration
	walking distance to adjoining residential areas and provide additional convenience and choice to support the adjoining Chullora employment area and the travelling public.
5.2 Reserving Land for Public Purposes	NA
5.3 Development Near Regulated Airports and Defence Airfields	NA. The Site is identified as being within a 30km wind turbine buffer zone on the Wind Turbine Buffer Zone Map under <i>State Environmental Planning Policy (Precincts--Western Parkland City) 2021 Wind Turbines Map</i> . However, there are no wind turbines proposed as part of the Planning Proposal or development concept.
5.4 Shooting Ranges	NA
5.5 High Pressure Dangerous Goods Pipelines	NA. A Dial Before You Dig survey has identified a high-pressure gas pipeline traverses the front of the Site in the road corridor, however, this is not one of the handful of pipelines identified in the Direction (or associated SEPP provisions). Notwithstanding, any future development application for the Site would include engagement with Jemena (the pipeline operator).
Focus Area 6: Housing	
6.1 Residential Zones	NA
6.2 Caravan Parks and Manufactured Home Estates	NA
Focus Area 7: Industry and Employment	
7.1 Employment Zones	The Planning Proposal does not seek to reduce the amount of industrial land available, but rather seeks to make service station and restaurant or cafe development permissible over the entire Site, instead of just a portion of it. This is not inconsistent with the 'retain and manage' policy position of government. On the contrary, service stations, restaurants, cafés and takeaway food premises are all important urban services that complement the employment areas such as Chullora. Given the Site is not large enough to support large format warehousing or logistics facilities like the surrounding properties, but benefits from direct access to the Hume Highway, the optimal use for the Site is for urban support services, i.e. service station development along with some form of food and drink premises (takeaway, café or restaurant).

Direction Title	Consideration
7.2 Reduction In Non-Hosted Short-Term Rental Accommodation Period	NA
7.3 Commercial and Retail Development Along the Pacific Highway, North Coast	NA
Focus Area 8: Resources and Energy	
8.1 Mining, Petroleum Production and Extractive Industries	NA
Focus Area 9: Primary Production	
9.1 Rural Zones	NA
9.2 Rural Lands	NA
9.3 Oyster Aquaculture	NA
9.4 Farmland of State and Regional Significance on the NSW Far North Coast	NA

Table 6 - Assessment of the Planning Proposal against the relevant Section 9.1 Directions

5.4 Mapping to Support the Planning Proposal

A draft 'Additional Permitted Uses Map' has been prepared to support the application and can be seen in **Figure 8** below and at **Appendix G** of this report.

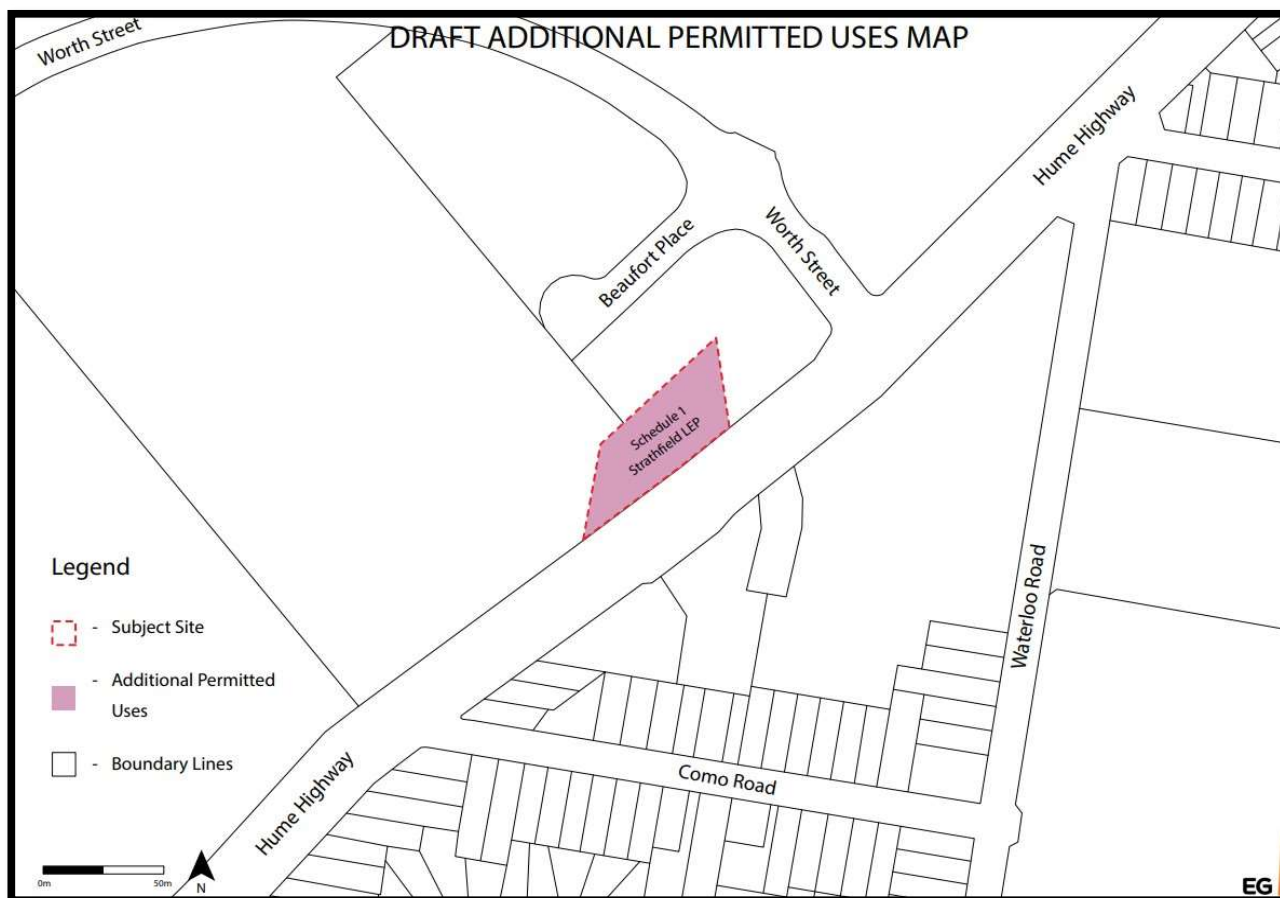


Figure 8 – Draft Additional Permitted Uses Map - Source: EG Property Advisory

5.5 Consultation

The Applicant has had multiple meetings with both Strathfield and Canterbury-Bankstown Councils in the pre-lodgment phase of this Planning Proposal. Both Councils have indicated support in the preliminary discussions for this Planning Proposal. In accordance with the Department's Local Environmental Plan Making Guideline and the Gateway determination, the Planning Proposal will be exhibited for a minimum of 20 days. Further consultation will be undertaken with the Councils along with the NSW Environmental Protection Authority, Fire and Rescue NSW, Heritage NSW, Transport for NSW and utility providers.

5.6 Project Timeline

In accordance with the Department's Local Environmental Plan Making Guideline, the Proposal is likely to be categorised as a 'Standard' application that has a benchmark end to end timeframe of 320 days. The Gateway determination for the proposal indicates that the LEP should be completed on or before 10 April 2026.

6.0 CONCLUSION

The Site is a relatively small and underutilised piece of industrial land, particularly as compared with the surrounding industrial sites that are predominantly utilised for large-format warehousing and logistics facilities. Further, the Site has not been used for industrial purposes for more than a decade and operated as a car sales yard for over 10 years.

The specialist Economic Impact Assessment (see **Appendix D**) supporting the Proposal has identified a major gap in urban services on that side and part of the Hume Highway, with no service stations between the Shell at Yagoona and the 7-11 at Strathfield South (a distance of approximately 8.4 km). Further, the Proposal would result in positive social and economic impacts including employment opportunities during construction (21 FTE) and operation (16 FTE), convenience and choice for workers, residents and visitors having a service station on that side of the Hume Highway and improved security through the activation of the Site.

Importantly, the Planning Proposal does not seek to reduce the amount of industrial land available, but rather seeks to make service station and restaurant or cafe development permissible over the entire Site, instead of just a portion of it. This is not inconsistent with the 'retain and manage' policy position of government. On the contrary, service stations, restaurants, cafés and takeaway food premises are all important urban services that complement the employment areas such as Chullora.

Given the Site is not large enough to support large format warehousing or logistics facilities like the surrounding properties, but benefits from direct access to the Hume Highway, the optimal use for the Site is for urban support services, i.e. service station development along with some form of food and drink premises (takeaway, café or restaurant). It is therefore recommended that the Planning Proposal be supported in full.