



18 September 2019

Zoi Flannery
Manager Eastern and South District
Place, Design and Public Spaces
Department of Planning, Industry and Environment
Level 27, 320 Pitt Street
SYDNEY NSW 2000

Dear Zoi,

**Re: Additional Information Required
Rezoning Review Application for 160 Burwood Road, Concord –
Planning Proposal PP2018/0003, City of Canada Bay Council**

This letter is provided in support of a request for the Department's independent review and determination in respect of a Planning Proposal for 160 Burwood Road, Concord (PP2018/0003) submitted to City of Canada Bay Council (Council).

The Planning Proposal (as amended September 2019) seeks an amendment to the Canada Bay Local Environmental Plan 2013, which was gazetted in July 2013. Subsequent amendments to the LEP have not applied to the development standards applicable to the subject site. Accordingly, this amended Planning Proposal does not seek to amend LEP controls that are less than 5 years old.

This letter should be read in conjunction with:

- The amended Planning Proposal prepared by LFA (Pacific) Pty Ltd, dated 11 September 2019.
- The cover letter addressed to Laura Locke prepared by LFA (Pacific) Pty Ltd, dated 12 September 2019

This letter has been prepared in accordance with Section 6.2 of *A guide to preparing local environmental plans* and consideration of the Planning Circular (PS 18-012) '*Independent reviews of plan making decisions*'. It provides a summary of the strategic and site-specific merit of the amended Planning Proposal.

Site Description and Context

The subject site is located at 160 Burwood Road, Concord. It is comprised for four lots legally defined as Lot 5 in DP 129325; Lot 2, DP230294; Lot 398, DP752023; and Lot 399, DP752023.



Figure 1: Site and Lot DP (Source: Urbis)

The site is 3.9ha and is bound by Massey Park Golf Course and Exile Bay to the north, Burwood Road to the south, medium density residential development to the east and low density residential development to the west.

It is zoned IN1 Industrial Uses and is occupied by a coffee manufacturing facility which has been operational for the past 19 years, which currently employs 136 full-time and part-time staff.

The factory has reached the end of its useful life. Given that continued use is constrained by the site's peninsular location surrounded by residential uses, limited heavy vehicle road access, isolation from other industrial uses and distance from major transport routes, an alternative location for future operations is being sought. Accordingly, there is an opportunity to explore alternative land uses of the site.

The Planning Proposal

The Planning Proposal (11 September 2019) seeks an amendment to the Canada Bay Local Environmental Plan 2013 to enable the rezoning of the 3.9ha site from its current IN1 General Industrial zoning to a range of B1 Neighbourhood Centre, R3 Medium Density Residential and RE1 Public Recreation. The proposal seeks to list the existing Central Roasting Hall (Former Bushells Factory building) as an item of local environmental

heritage item, which is to be retained and adaptively reused. Amendments to permissible heights ranging from 12m (3 storeys) to 21m (6 storeys) and floor space ratio to 1.25:1 are also sought.

As part of the Planning Proposal, the Proponent is seeking to enter into a Voluntary Planning Agreement (VPA) that provides for public benefits including a minimum 5% of total dwellings for affordable housing; 8,900m² of public open space; provision of a shuttle bus service; restoration works to the seawall and associated waterfront edge landscaping; and funding for protective golf nets.

Objectives and Intended Outcome

The objective of the Planning Proposal is to facilitate the urban renewal of this industrial site to become a mixed-use riverside village that offers a mix of land uses that are more suited and complimentary to the existing local area including residential, retail, commercial, community, recreational and urban support service uses.

The intended outcome is the provision of approximately 400 new dwellings together with approximately 3,500m² of retail / commercial uses and approximately 1,200m² of urban services uses. The proposal will include new local roads and 8,900m² of public open space including a foreshore park to Exile Bay.

Built form will range from 3 storeys (12m) to a maximum of 6 storeys (21m), focused around the retention and adaptive reuse of the Central Roasting Hall building (Former Bushell's Factory building).



Figure 2: Concept Plan (Source: Roberts Day)



Background

The Planning Proposal was originally lodged with Council on 21 June, 2017. Council considered the proposal and resolved to not support it and subsequently invited the Proponent to submit an amended application that addressed three key issues – building height, FSR and residential zoning. The amended application was lodged with Council on 30 July 2018, although the Council required it be submitted as a new proposal. While maintaining the position that it was an amended application, it was agreed to lodge as a new application as Council would not accept the amendments otherwise. Council requested further amendments and those were provided on 7 February 2019. In response to the matters raised by the Canada Bay Local Planning Panel on 5 June 2019, the current amended Planning Proposal was lodged with Council on 11 September 2019. Details of the evolution of amended Planning Proposal are provided in the separate cover letter dated 12 September 2019.

While the proponent still maintains the current amended Planning Proposal is a modification of the original 2017 proposal that was lodged prior to the Greater Sydney Commission's District Plans were released, the following assessment of the strategic merit test is provided.

1. Strategic Merit Test

1.1 Consistency with the Eastern City District Plan

The amended Planning Proposal is considered to have strategic merit, on the basis that it will deliver on the following Planning Priorities:

- *Planning Priority E4 – Fostering healthy, creative, culturally rich and socially connected communities*
- *Planning Priority E5 – Providing housing supply, choice and affordability with access to jobs, services and public transport*
- *Planning Priority E6 – Creating and renewing great places and local centres, and respecting the District's heritage*
- *Planning Priority E10 – Delivering integrated land use and transport planning and a 30-minute city*
- *Planning Priority E14 – Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways*
- *Planning Priority E16 – Protecting and enhancing scenic and cultural landscapes*
- *Planning Priority E17 – Increasing urban tree canopy cover and delivering Green Grid connections*
- *Planning Priority E18 – Delivering high quality open space*
- *Planning Priority E20 – Adapting to the impacts of urban and natural hazards and climate change*



A detailed matrix of the relevant Planning Priorities and Objectives together with the Amended Planning Proposal response is provided in Attachment A.

The amended Planning Proposal is not consistent with *Planning Priority 12 – Retaining and managing industrial and urban services land*. This priority is to safeguard the redevelopment of industrial land for residential and other uses to ensure adequate land is available for urban services, freight, logistics and advanced manufacturing.

The subject site, being on a peninsula on Exile Bay, with poor road access for heavy vehicles and proximity to sensitive residential uses is a constraint to the continuation of General Industrial uses on the site. Further, the Inner West industrial market is characterised by low levels of demand and a shift from traditional industrial uses, as found in the Economic Impact Assessment prepared by HillPDA (Appendix D of the amended Planning Proposal).

In addition, Council engaged AEC Group to undertake a detailed assessment of the amended Planning Proposal. AEC confirmed that, notwithstanding the robust demand for well-located industrial land in inner/middle ring suburbs, the site's proximity to residential uses and the need to access the site through residential streets does conceivably reduce its marketability and future sustainability as industrial lands. On balance, the co-location of low impact urban services and local convenience retail with residential uses was recommended as being an appropriate land use response for the site.

The report presented to the Canada Bay Local Planning Panel by Council on 5 June 2019 recommended that part of the site as be zoned IN1 General Industrial to facilitate some low impact industrial uses on the site. The Canada Bay Local Planning Panel considered the zoning of the site and the strategic planning framework and advised that:

“The Panel is of the view that given the site’s context and location that it is not suitable for continued or more intense use for industrial and urban services land and should be rezoned to allow for medium-density residential development, mix of local services uses and foreshore public open space”

Given the subject site has limited suitability for continued or intensified industrial development, as permitted in the current IN1 General Industrial zone, and given the comments above by the Canada Bay Local Planning Panel, inconsistency with Planning Priority 12 of the Eastern City District Plan is justified. Notwithstanding, the amended Planning Proposal is generally consistent with the Eastern City District Plan across all other Planning Priorities as detailed in Attachment A and Section 5.3.1 of the amended Planning Proposal (pages 45-80).



1.2 Giving effect to a relevant local strategy that has been endorsed by the Department

Canada Bay Local Planning Strategy 2010-2031 (June 2010)

Council's Local Planning Strategy 2010-2031 specifies the retention of the industrial zone on the subject site for a limited timeframe, as set out in the extract below (p.79):

Objective E5 Retain industrial sites within the LGA

Industrial sites at George Street, North Strathfield, Leeds Street Rhodes and the Freshfood Site (Bushells), Concord should be retained. Although the retention of these sites does not translate into significant employment growth for the LGA, these sites are important to support growth in local business activity associated with population growth and have a level of strategic significance at both a local and sub-regional level.

Action E8 Retain industrial zones at George Street, North Strathfield, Leeds Street Rhodes and the Freshfood Site (Bushells), Concord

The IN1 General Industrial zoning is likely to be the most appropriate land use zone for these areas. Council supports the retention of these areas for industrial purposes for the medium term with further investigation to occur within the following timeframes:

- George Street 5 years
- Leeds Street 10 years
- Freshfood Site 10 years

Given that the above Strategy was adopted in 2010, the subject site is to retain industrial uses to year 2020. Redevelopment for other land uses after this timeframe has also been foreshadowed, as referenced in the extract below (p.51):

Action H6 Consider opportunities for the provision of affordable housing on rezoned sites

Over the longer term employment lands at Bibby Street and the Freshfood site (Bushells) are expected to be rezoned for other purposes. Provision of affordable, or low cost housing, should be explored on these and other similar sites as opportunities arise.

The amended Planning Proposal is consistent with the endorsed Local Planning Strategy given that the rezoning of the site would occur after the above timeframe, and that provision for affordable housing is offered as part of the Draft VPA accompanying the amended Planning Proposal.



1.3 Responding to a change in circumstances

Draft Canada Bay Local Strategic Planning Statement

Since the submission of the amended Planning Proposal in February 2019, Council's release of their *Draft Local Strategic Planning Statement* has confirmed Council's long term view that the subject site is not suitable for ongoing industrial use and that certain actions must be met to ensure a high quality planning and urban design outcome of the site is achieved.

The *Draft Canada Bay Local Strategic Planning Statement*, sets out a specific action for the subject site under *Priority 6 – Provide high quality planning and urban design outcomes for key sites and precincts*, as follows (p.35):

Action 6.3 – Ensure any proposed changes to land use or development at the Freshfoods site (Bushell's site) at 160 Burwood, Road Concord:

- *includes industries that serve the population related needs of the Canada Bay community (urban support services);*
- *where land use is changed, the height and density of future development is compatible with the immediate surrounding context;*
- *includes a generous and publicly accessible foreshore setback to Exile Bay; and*
- *the Central Roasting Hall, chimney and "B" sign is heritage listed and future development is sympathetic to the buildings landmark status and "factory in a garden" setting.*

The amended Planning Proposal is consistent with the above actions; given that:

- The proposed scheme includes 1,200m² of GFA for urban services (light industries) that is to be located within the proposed B1 Neighbourhood Centre zone that will serve the population needs of the Canada Bay community.
- The proposed height and density responds to the immediate surrounding context by adopting a transitional approach that ranges from 3 storeys at the western and southern boundaries in response to existing residential development, and up to 6 storeys at the eastern boundary and at the centre of the site in response to taller residential flat buildings to the east and the retention of the Central Roasting Hall.

The proposed heights described above reflect the specific recommendations made by the Canada Bay Local Planning Panel on 5 June 2019.

- 8,900m² of new public open space will be provided, including an activated plaza and foreshore park to Exile Bay.
- The Central Roasting Hall, chimney and 'B' sign is proposed for local heritage listing and that the Concept Plan for the site ensures an arrangement of built form, open space and roads that enables the former factory building to retain its landmark quality and 'factory in the garden' setting.



Figure 2: Artist impression of an aerial view from Parramatta River towards the proposal with clear building height transitions (Source: RobertsDay)

Premier's Priorities

In addition, the *Premier's Priorities* were published on June 28, 2019 and provides an additional strategic framework for consideration. The following Priorities are relevant to the subject site:

- *Greener Public Spaces – Increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open and public space by 10 per cent by 2023*
- *Greening Our City – Increase the tree canopy and green cover across Greater Sydney by planting one million trees by 2022*

The amended Planning Proposal will deliver 8,900m² of new public open space together with improved road and pathway connections. The majority of the significant trees on the site will be retained. Any loss of existing tree canopy will be mitigated with new planting on the site, with a minimum of 25% urban tree canopy achievable. Accordingly, the redevelopment of the site will contribute to achieving the above relevant *Premier's Priorities*.



On that basis, the amended Planning Proposal is considered to have strategic merit on the basis that:

- It is consistent with the Eastern District Plan, with the exception of *Planning Priority E12 – Retaining and managing industrial and urban services land*. As noted above, both Council and the Canada Bay Local Planning Panel acknowledge that the site is unsuitable for the purposes of achieving Planning Priority 12.
- It gives effect to Council's Local Planning Strategy 2010-2031, which was endorsed by the NSW Department of Planning and Environment in 2009; and
- It responds to changed circumstances with the release of Council's *Draft Local Strategic Planning Statement and Premier's Priorities*.

2. Site-Specific Merit Test

The subject site has a waterfront location and is surrounded by residential development with good access to recreational open space. Thus, the amended Planning Proposal seeks to enable the renewal of the site to draw on its latent value as a river-side village, which is considered to be more complimentary to the existing neighbourhood than its current use. Additionally, the introduction of retail, commercial and community uses on the site will provide a level of containment such that residents of the peninsula will have a walkable alternative to Majors Bay Road Shops for meeting their day-to-day shopping and community needs.

The amended Planning Proposal provides for an urban design framework that sets a context of the retention of the existing Former Bushells Factory Central Roasting Hall, Chimney and 'B' facade as a recognisable landmark in the locality, whilst ensuring future development appropriately interfaces adjacent properties. The framework provides for greater permeability of the site with improved connections to the foreshore.

The environmental, social and economic impact of the amended Planning Proposal has been considered and will not adversely impact on the natural environment, surrounding land uses (existing, approved, and likely future land uses), nor existing or future services and infrastructure. This is detailed in Section 5.3.3 of the amended Planning Proposal and is summarised below.



2.1 Regard for the Natural Environment

The amended Planning Proposal has considered the natural environmental, and any significant environmental values, resources and or hazards associated with the site.

The site does not contain land of environmental significance or land of biodiversity values.

However, given its location on Exile Bay, the amended Planning Proposal provides a considered response to its coastal environment by ensuring appropriate public recreational uses along this edge and provisions as part of the Draft VPA for seawall restoration and associated water edge landscaping.

Other environmental factors have been considered as follows:

Tree Retention

The majority of the significant trees on the site will be retained. Any loss of existing tree canopy will be mitigated with new planting on the site, with a minimum of 25% urban tree canopy achievable in accordance with the Concept Plan, and Arborist Report (Appendix L).

Stormwater and Flooding

It is anticipated that the redevelopment of the site will have similar impervious and pervious surface ratios as currently exists for the site. Building roof stormwater runoff will be harvested for re-use in non-potable uses where possible. Council's requirements for stormwater management including flood mitigation, water re-use, water sensitive urban design, water quality control, and environmental protection can be provided for on-site. This would be formally addressed at the DA stage.

Contamination, Geotechnical and Groundwater

A Site Contamination Assessment (Appendix H) has been prepared for the site, it concludes that based on the soil samples assessed on the site are generally unlikely to pose a risk of harm to human health and the environment.



2.2 *Regard for existing uses, approved uses and likely future uses of the land in the vicinity*

The amended Planning Proposal seeks to enable the redevelopment of the site with land uses that are more suited and complimentary to the existing surrounding residential uses, which are unlikely to change.

The provision of residential, retail, commercial, recreational and urban support service uses, together with the public benefits of new local roads and open space, will enhance the immediate locality by:

- Providing for a new walkable neighbourhood centre that will serve the day-to day shopping needs for the current local population. At present, residents in the vicinity of the site require private vehicles or bus transportation to access the Majors Bay Shopping Centre.
- Providing for diversity of housing options, with a scale of built form that responds to existing neighbouring properties.
- Providing for net increase in local jobs.
- Providing for new development that will celebrate the heritage significance of the site, primarily through the retention and adaptive re-use of the Central Roasting Hall.
- Providing for new public open space, roads and paths to better connect existing residents to the Exile Bay foreshore and the wider Hen and Chicken Bay foreshore.
- Providing for new urban tree canopy, seawall restoration works and water edge landscaping to contribute to achieving a green and environmentally resilient city.

The Urban Design Study (Appendix C) included with the amended Planning Proposal demonstrates the above.

Further, the amended Planning Proposal will ensure a scale of development that will not adversely impact visual landscape character, residential amenity, local heritage or provision of housing. A summary is provided below of potential impacts on adjacent land uses which have been considered in the amended Planning Proposal.

Visual Impact

- The existing Former Bushells Factory Central Roasting Hall and associated chimney stack will remain the dominant built form features on the site, ensuring the value of the factory as a recognisable landmark.
- Views from residences on Duke Avenue will not be adversely impacted, as the 12m side setback provided for in the Concept Plan will enable retention of existing established trees that already screen such views.



- Views towards the site from the Burwood Road street frontage will change in appearance, however will not result in view loss to a particular scenic element.
- New buildings as a consequence of the amended Planning Proposal will not cause significant public domain view loss or blocking effects. Primary view loss of key public domain locations are likely to be restricted to upwards views of open sky. Whilst new buildings will alter the composition of foreground views from close public and private viewing locations, they will not block views to scenic or more highly valued items.

Overshadowing

The potential overshadowing impacts of the amended Planning Proposal are as follows:

- Solar access to properties west of the site may result in a minor reduction in the morning. However much of the shadow impact will be contained within shadows of existing trees.
- Properties the south of the site will not experience impact of overshadowing as a result of the proposal.
- Properties to the east of the site may result in some reduction to afternoon sun light after 2pm at the winter solstice. The impact on existing buildings may be minimised through careful building massing and articulation.

Heritage

- A Statement of Heritage Impact (Appendix J) has been prepared which concluded that there are no aspects of the proposal which would be detrimental to the significance of the local heritage items in the vicinity of the site, being Massey Golf Course, Sanders Reserve, Bayview Park and particular Street Trees, by way of not altering curtilage, and maintaining views.
- The amended Planning Proposal will positively contribute to heritage through the proposed listing of the Central Roasting Hall building, the chimney stack, the 'B' facade, and the landscaped setting.
- The Concept Plan has been designed to ensure that the important aspects to the current heritage setting will be conserved, being:
 - a visually prominent Central Roasting Hall building; and
 - the characteristic industrial landscape setting.

The elements above will be retained and conserved, by virtue of the proposed built form heights, urban structure and the provision of public open space at the foreshore.



Housing Supply

The amended Planning Proposal enables a range of housing products to be developed on the site to positively contribute to housing supply within Concord and Canada Bay Local Government Area. The Concept Plan provides for approximately 400 dwellings and the Draft VPA includes a minimum 5% provision for affordable housing.

2.3 Regard for existing and/or future services and infrastructure and any proposed financial arrangements for infrastructure provision.

Investigations into the impact of the amended Planning Proposal on existing infrastructure and provision of services have been undertaken for the site. The findings of the assessments, together with details of the Draft VPA offer, are provided below.

Traffic and Transport

- The revised Traffic Impact Assessment (Appendix G) identifies that the amended Planning Proposal would generate in the order of 194 movements in the AM peak hour and 267 movements in the PM and Saturday peak hours for 400 dwellings. SIDRA intersection analysis of post-development traffic in year 2019 indicates that all intersections would operate at satisfactory levels (Levels of Service D or better). Intersection analysis of post development traffic for the future year 2036, taking into consideration WestConnex, shows that the relevant intersections operate within comparable levels of service to their existing operation (acceptable LOS D or better), with the exception of the following intersections:
 - Burwood Road/ Crane Street (LOS E) during PM peak hour; and
 - Burwood Road/ Gipps Street (LOS E) during the AM peak hour.
- Accordingly, it is proposed that the project team would work with RMS and Council to agree operational and physical improvements to mitigate impacts on affected intersections, particularly the Burwood Road/ Crane Street intersection. These could include select peak period right turn bans to improve intersection efficiency where turning movements are currently low and further local area traffic management devices to reduce travel speeds and improve operation.
- The proposal provides for 774 car parking space, which satisfies Council's DCP requirements.
- The amended Planning Proposal will have a positive impact on walking and active transport, given the provision of new local roads and foreshore open space that will improve.
- Against existing traffic volumes in the vicinity of the site, the additional traffic generated by the proposed development could not be expected to



compromise the safety or function of the surrounding road network, following implementation of select agreed road network improvements.

Retail and Employment

- The amended Planning Proposal will provide of a net increase in 51 jobs associated with the provision of a new neighbourhood centre.
- With a total retail / commercial floor area of 3,500m², the Retail Demand Assessment (Appendix E) has found that \$18.7m out of \$35m growth in the walkable catchment of site between 2016 and 2031 would be captured by retail as proposed in the Concept Plan. The proposed centre is justifiable based on growth alone and would not be reliant upon redirecting significant trade away from existing centres.

Social Needs – Draft VPA

As mentioned previously, the amended Planning Proposal further addresses social needs through the provision of the following public benefits:

- Minimum 5% of total dwellings, dedicated to an independent affordable housing provider for the provision of Affordable Housing;
- 8,900m² of land to be dedicated to Council as public open space upon completion of the development project;
- Funding for the provision of a bus service for a period of three years with an estimated cost of \$280,000 per annum (total \$840,000); and
- Restoration works to the seawall and additional waterfront edge landscaping to provide access to the water (estimate \$2,100,000). Agreement will be reached with the Roads and Maritime Service to confirm final scope of works)
- The funding of Protective Golf Nets to be installed on the Golf Course Lands behind the “Green” adjacent to the Zoeller St Reserve (estimate \$200,000)



3. Conclusion

This letter has been prepared in support of a Rezoning Review request to DPIE in relation to an amended Planning Proposal for the former Bushells Factory site at 160 Burwood Road, Concord.

The continued suitability and appeal of the site for industrial use is constrained by the site's peninsular location, poor road access for heavy vehicles and proximity to sensitive residential uses. Further, the Inner West industrial market is characterised by low levels of demand and a shift from traditional industrial uses.

The objective of the amended Planning Proposal is to facilitate the urban renewal of this industrial site to become a mixed-use riverside village that offers a mix of land uses that are more suited and complimentary to the existing local area including residential, retail, commercial, community, recreational and urban support service uses.

Furthermore there are a number of environmental, social and economic benefits that would result from the proposal including:

- Improving housing supply and choice in a well-connected location close to public transport, jobs and various amenities;
- Increased employment opportunities on the site, based on a projected net increase of 51 jobs on the site;
- The activation of the foreshore harbour frontage by improving the site's connectivity, providing new public access and landscape amenity;
- Provision of a neighbourhood-scale centre, providing a walkable alternative to Majors Bay Road shops for existing and future residents;
- Removing heavy vehicle movements relating to the industrial uses from the area.

Public benefits offered as part of the amended Planning Proposal via the Draft VPA affordable housing; new public open space; provision of a shuttle bus service; restoration works to the seawall and associated waterfront edge landscaping; and funding for protective golf nets.

The amended Planning Proposal is considered to have strategic merit on the basis that:

- It is consistent with the Eastern District Plan, with the exception of Planning Priority E12 – Retaining and managing industrial and urban services land. As noted above, both Council and the Canada Bay Local Planning Panel acknowledge that the site is unsuitable for the purposes of achieving *Planning Priority 12*.



- It gives effect to Council's *Local Planning Strategy 2010-2031*, which was endorsed by the NSW Department of Planning and Environment in 2009; and
- It responds to changed circumstances with the release of Council's *Draft Local Strategic Planning Statement and Premier's Priorities*.

The amended Planning Proposal demonstrates site-specific merit on the basis that it has carefully considered the natural environment, surrounding land uses (existing, approved, and likely future land uses), and existing/future services and infrastructure. Key environmental, social and economic effects that may result from the amended Planning Proposal have been considered. The proposed scale and density of the amended Planning Proposal will not adversely impact the visual and landscape setting of the Central Roasting Hall; surrounding properties in terms of views, overshadowing and amenity; or existing traffic conditions.

Accordingly, we seek the Department's favourable consideration.

Please do not hesitate to contact me on 9327 6822 should you have any further queries or require additional information.

Yours faithfully,

LFA (Pacific) Pty Ltd

Carla Mamaril
Associate

A handwritten signature in black ink, appearing to read 'Carla Mamaril', written over the typed name.

Attachments:




- Attachment A – Consistency with the Eastern City District Plan

ATTACHMENT A: CONSISTENCY WITH THE EASTERN CITY DISTRICT PLAN

PLANNING PRIORITY	OBJECTIVES		AMENDED PLANNING PROPOSAL RESPONSE
<i>Planning Priority E1 Planning for a city supported by infrastructure.</i>	Objective 1 Infrastructure supports the three cities	✓	The area is not the benefit of State Government infrastructure investment or a growth infrastructure compact.
	Objective 2 Infrastructure aligns with forecast growth – growth infrastructure compact		
	Objective 3 Infrastructure adapts to meet future needs	✓	
	Objective 4 Infrastructure use is optimised		
	Potential Indicator: Increased 30-minute access to a metropolitan centre/cluster	✓	
<i>Planning Priority E2 Working through collaboration</i>	Objective 5 Benefits of growth realised by collaboration of governments, community and business	✓	Whilst not in a collaboration area, the proposal will deliver public open space, an increase in the amount of jobs on site, and affordable housing. Provision of these items will only be achievable through collaboration with the landowner.
	Potential Indicator: Increased use of public resources such as open space and community facilities	✓	
<i>Planning Priority E3 Providing services and social infrastructure to meet people's changing needs</i>	Objective 6 Services and infrastructure meet communities' changing needs	✓	The proposal will deliver new public spaces, including public open space for community recreation and new walking and cycle paths to foster a more accessible and walkable neighbourhood.
<i>Planning Priority E4 Fostering healthy, creative, culturally rich and socially connected communities</i>	Objective 7 Communities are healthy, resilient and socially connected	✓	The amended Planning Proposal enables the creation of a truly walkable neighbourhood. The proposed public roads and series of public spaces connected to ground floor retail/commercial uses as well as the foreshore park provides greater opportunities for walking and cycling and contributes to active street life.
	Objective 8 Greater Sydney's communities are culturally rich with diverse neighbourhoods	✓	

PLANNING PRIORITY	OBJECTIVES		AMENDED PLANNING PROPOSAL RESPONSE
	Objective 9 Greater Sydney celebrates the arts and supports creative industries and innovation	✓	Opportunities for creative and artistic expression and participation will be provided within the adaptively-reused
	Potential Indicator: Increased walkable access to local centres	✓	Central Roasting Hall. The public plaza would also provide for opportunities for art and cultural events. In addition, a close working relationship with the City of Canada Bay could facilitate cultural events and celebrations of art within the public plaza. Street activation and public open space will encourage active transport and better connections within the existing local centre.
<i>Planning Priority E5 Providing housing supply, choice and affordability with access to jobs, services and public transport</i>	Objective 10 Greater housing supply	✓	The proposal will contribute to housing supply in the LGA.
	Objective 11 Housing is more diverse and affordable	✓	A diversity of housing is proposed to cater for a range of household types, with a minimum 5% affordable housing offered as part of the amended Planning Proposal. Future residential development on the site will be in accordance with the 30-minute city aspiration given recently improved bus services to Burwood Town Centre, and the proposed ferry that will connect residents of the peninsula to Barrangaroo (i.e. Harbour CBD).
<i>Planning Priority E6 Creating and renewing great places and local centres, and respecting the District's heritage</i>	Objective 12 Great places that bring people together	✓	The proposed riverside urban village will become a focal point for the local community, particularly given the provision of a new foreshore park.
	Objective 13 Environmental heritage is identified, conserved and enhanced	✓	
	Potential Indicator: Increased access to open space	✓	The Central Roasting Hall, chimney and 'B' sign are proposed for local environmental heritage listing, thereby contributing to the local and historical and industrial character of the site.

PLANNING PRIORITY	OBJECTIVES		AMENDED PLANNING PROPOSAL RESPONSE
<i>Planning Priority E7 Growing a stronger and more competitive Harbour CBD</i>	Objective 15 The Eastern, GPOP and Western Economic Corridors are better connected and more competitive Objective 18 Harbour CBD is stronger and more competitive		The site is not located in the Eastern, GPOP and Western Economic Corridors.
<i>Planning Priority E8 Growing and investing in health and education precincts and the Innovation Corridor</i>	Objective 21 Internationally competitive health, education, research and innovation precincts		The site is not located in an identified health and education precinct, or the Innovation Corridor.
<i>Planning Priority E9 Growing international trade gateways</i>	Objective 16 Freight and logistics network is competitive and efficient		The proposal does not involve freight and logistics.
<i>Planning Priority E10 Delivering integrated land use and transport planning and a 30-minute city</i>	Objective 14 A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities Percentage of dwellings located within 30 minutes by public transport of a metropolitan centre/ cluster/ strategic centre	✓ ✓	The proposal will promote a safe and walkable local centre as well as providing significant public open space to the local community. Although the site is not a strategic centre nor identified within a transit corridor, future development on the site will be in accordance with the 30-minute city aspiration given recently improved bus services to Burwood Town Centre, and the provision of shuttle bus services to key destinations by the Proponent.
<i>Planning Priority E11 Growing investment, business opportunities and jobs in strategic centres</i>	Objective 22 Investment and business activity in centres	✓	The proposal will promote investment and business activity in the local centre and support the hierarchy of centres by both creating and renewing the area.

PLANNING PRIORITY	OBJECTIVES		AMENDED PLANNING PROPOSAL RESPONSE
<i>Planning Priority E12 Retaining and managing industrial and urban services land</i>	Objective 23 Industrial and urban services land is planned, retained and managed		The amended Planning Proposal is not consistent with Planning Priority 12, which requires the retention and management of industrial lands. The site represents just 0.2% of the total industrial lands in the Eastern City. Section 5.3.1 (Q2) of this report provides justification for the rezoning of this land for other purposes given its site characteristics and lack of market demand in that area. Accordingly, an exception to this Planning Priority is sought.
<i>Planning Priority E13 Supporting growth of targeted industry sectors</i>	Objective 24 Economic sectors targeted for success		Planning Priority 13 identifies tourism as a key industry sector in the Eastern City. This is not relevant to the amended Planning Proposal as it is not proposed that the renewal of the site would be for tourism purposes.
<i>Planning Priority E14 Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways</i>	Objective 25 The coast and waterways are protected and healthier		The proposal will quarantine any development from occurring in Exile Bay. The development will demonstrate a net zero impact to the environmental values of the existing waterway.
<i>Planning Priority E15 Protecting and enhancing bushland and biodiversity</i>	Objective 27 Biodiversity is protected, urban bushland and remnant vegetation is enhanced		The scenic and cultural value of the factory site as a visual landmark will be retained and protected through heritage listing and appropriately scale built form.
<i>Planning Priority E16 Protecting and enhancing scenic and cultural landscapes</i>	Objective 28 Scenic and cultural landscapes are protected		

PLANNING PRIORITY	OBJECTIVES		AMENDED PLANNING PROPOSAL RESPONSE
<i>Planning Priority E17 Increasing urban tree canopy cover and delivering Green Grid connections</i> <i>Planning Priority E18 Delivering high quality open space</i>	Objective 30 Urban tree canopy cover is increased	✓	<p>The majority of the significant trees on the site will be retained. Any loss of existing tree canopy will be mitigated with new planting on the site, with a minimum of 25% urban tree canopy achievable.</p> <p>The new foreshore park will provide a new high quality open space for the local community and enhance connectivity for the Hen and Chicken Bay Foreshore as identified in the Sydney Green Grid.</p>
	Objective 32 The Green Grid links parks, open spaces, bushland and walking and cycling paths	✓	
<i>Planning Priority E19 Reducing carbon emissions and managing energy, water and waste efficiently</i>	Objective 33 A low carbon city contributes to net-zero emissions by 2050 and mitigates climate change	✓	<p>The urban renewal of the site will provide opportunities for greater sustainability measures to be implemented on site than currently exists to mitigate the impacts of climate change.</p>
	Objective 34 Energy and water flows are captured, used and re-used	✓	
	Objective 35 More waste is re-used and recycled to support the development of a circular economy	✓	
<i>Planning Priority E20 Adapting to the impacts of urban and natural hazards and climate change</i>	Objective 36 People and places adapt to climate change and future shocks and stresses	✓	<p>The urban renewal of the site will provide opportunities to address future shocks, stresses, and urban and natural hazards.</p> <p>Restoration works to the seawall are proposed as part of the Draft VPA offer which contributes to achieving a resilient city.</p>
	Objective 37 Exposure to natural and urban hazards is reduced	✓	
	Objective 38 Heatwaves and extreme heat are managed	✓	