

PRE-GATEWAY REVIEW – Information Assessment and Recommendation Report

LGA:	Strathfield	
Amended LEP:	Strathfield Local Environmental Plan 2012	
Address:	7-23 and 25-33 Water Street, South Strathfield (Lot 1 DP 603465; Lot 2 DP 603465; Lot 3 DP 217450; Lot 22 DP 402062; Lot 23 DP 29213; and Lot 24 DP 2921).	
Reason for review:	☒ Council notified proponent it will not support proposed amendment	☐ Council failed to indicate support for proposal within 90 days
Is a disclosure statement relating to reportable political donations under s147 of the Act required and provided?	☒ Provided ☐ N/A Comment: No donations or gifts to disclose	

1. SUMMARY

On 15 August 2016, Urbis Pty Ltd, on behalf of Westport Pty Ltd and RJ Green & Lloyd Pty Limited, submitted a request to the Department for a pre-Gateway review of the planning proposal relating to land at 7-23 and 25- 33 Water Street, South Strathfield (Tab E).

The planning proposal (Tab F) seeks to rezone the land and amend the maximum building height and floor space ratio (FSR) controls applicable to 7-23 and 25-33 Water Street, Strathfield South (Figure 1). The site consists of two blocks, split by ownership. Site A is 25-33 Water Street and is owned by RJ Green & Lloyd and Site B is 7-23 Water Street and owned by Westport Pty Ltd.



Figure 1: Site. Source: Planning Proposal



Figure 2: Site and Enfield Intermodal Logistics Centre.
Source Enfield ILC EIS and Strathfield LEP 2012.

The site comprises six lots and has a total area of 18,952.7m² (1.9 ha). It is bounded by contiguous industrial land to the west, the Cooks River to the south, low density residential development of one to two storeys along Water Street to the east, low density residential development to the north and residential flat buildings of up to 3 storeys are also located to the north east of the site along Water Street. The site is not located within an identified urban renewal corridor, centre or major redevelopment project, but is located in close proximity to other industrial land and 2km from the Enfield Intermodal Logistics Centre to the south west.

The site is currently used for a variety of industrial purposes, including household trades, distribution centres and vehicle repairs. The adjacent industrial areas are also used for a variety of industrial uses, including a concrete batching plant and warehouse and logistics centre. The nearby industrial area and the Enfield Intermodal Logistics Centre are separated from the subject site by the Cooks River (Figure 2). The Intermodal will involve various light industrial and commercial uses and will provide a key connection to Port Botany.

The site is somewhat isolated from the bulk of Strathfield's industrial and employment lands and access to it is via residential streets. It is also constrained by limited access to major haulage transport routes (which are via the local road network), the low rise small lot fine grain character of the surrounding residential area, exposure to flash flooding, potential contamination from existing and former industrial uses, and presence of large electric tower and overhead power lines and large below ground high pressure oil pipeline adjacent to the site to the south.

The proposal seeks to amend the following controls under the *Strathfield Local Environmental Plan 2012* (Strathfield LEP 2012) for the site (Figure 3):

- rezone the site from zone IN1 General Industrial to R4 High Density Residential;
- amend the Height of Buildings Map from 12 metres to 28 metres; and
- amend the Floor Space Ratio Map from 1:1 to 1.85:1.



Figure 3: Existing and Proposed Controls. Source: Planning Proposal

The proposal will facilitate the redevelopment of the site for residential development comprising approximately 361- 371 apartments across 5 buildings of 3-8 storeys and basement parking for up to 607 cars and landscaping.

The Greater Sydney Commission were briefed on the proposal and raised concerns about the loss of industrial land and unsuitability for high density residential in this location.

In summary, it is considered that the proposal has strategic merit in its delivery of additional and diverse housing for Sydney, at a location that is relatively accessible for residential traffic but constrained for industrial traffic. This is consistent with the housing directions within A Plan for Growing Sydney, draft Central District Plan and Council's local strategy. The Department

considers that the proposal has sufficient strategic merit to warrant its consideration by the Sydney Central Planning Panel.

However, it is recommended that, should the proposal proceed to Gateway, the planning proposal be expanded to include the whole of the Water Street/Dunlop Street Precinct, consistent with Council's Economic Land Use and Employment Strategy (SGS 2010), which recommends that alternative uses for the whole of the precinct be investigated, including land 'pooling' to expand the open space corridor adjacent to the Cooks River, while allowing for comprehensive redevelopment of the current industrial land for R3 Medium Density Residential uses. The investigation should include further work to address inconsistencies with the relevant Section 117 Direction (and subsequently released draft District Plan) in relation to the loss of industrial land, the impact of rezoning the whole of the industrial precinct (versus the proposed partial precinct) on the future operations of the industrial/business precinct and nearby industrial areas including the Enfield Intermodal logistics centre, flooding, contamination, and electromagnetic radiation from nearby high voltage power lines, and visual and amenity issues associated with the increase in development controls in relation to the low density residential surrounds.

History of the Planning proposal

In 1998 and 2003, two rezoning applications seeking to rezone the site of 7-23 Water Street from Industrial to Residential were lodged with Council. The Planning proposal states that both were refused due to concerns with the management of land contamination and impacts associated with increasing the maximum building height.

In December 2009, Council resolved to endorse a planning proposal to rezone 7-33 Water Street & 8-10 Dunlop Street from Industrial to Medium Density Residential.

In February 2010, the Department determined not to support the proposal for the following reasons:

- 1. The proposal is premature given the imminent completion of Council's economic and employment land use study. This study will inform Council in relation to the future of employment land throughout the LGA and the importance of retaining Category 1 employment lands to meet Council's employment targets.*
- 2. In the event that the study shows that the rezoning of the subject land is appropriate, Council should consider extending the Planning Proposal to cover all of the industrially zoned land in the South Strathfield Water Street precinct to avoid future land use conflicts.*

Prior to lodging the current planning proposal, the proponent met with Council officers on 19 June 2015. During the meeting, an R3 Medium Density Residential zoning was discussed. However in August 2015 the applicant sought Council officer support on a proposal with a R4 High Density Residential zoning, maximum building height of 28 metres and a FSR of 2:1. Council officers indicated that it was unlikely to support the proposed R4 zoning. The proponent formally lodged the planning proposal with Council on 22 April 2016.

On 19 July 2016 Strathfield Council resolved not to support the proposal. On 8 August 2016, Urbis lodged the planning proposal with the Department for a Pre-Gateway review.

2. REQUIREMENTS UNDER SECTION 55 OF THE EP&A ACT

2.1 Objectives and intended outcomes

The objectives and intended outcomes of the planning proposal are to:

- deliver residential housing in response to the identified need outlined by State and Local planning strategies situated close to facilities and services;
- provide opportunities for improvement to the wider public domain including relocation and replacement of the existing Water Street bus stops adjacent to the site;
- provide a catalyst to further renewal of the Water Street/Dunlop Street Precinct;
- transform an underutilised industrial site into a vibrant residential development; and
- provide a range of dwelling types in close proximity to transport, schools, open space, retail and support services.

2.2 Explanation of provisions

The following amendments to the Strathfield LEP 2012 for the site have been requested:

- amend the Land Zoning Map, rezoning the site to R4 High Density Residential;
- amend the Building Height Map to 28 metres in height; and
- amend the Floor Space Ratio Map to apply a maximum FSR of 1.85:1.

No other amendments or site specific controls have been requested.

2.3 Mapping

The planning proposal contains sufficient mapping. The mapping clearly demonstrates existing and proposed controls for the site as well as the site in its context.

2.4 Community consultation (including agencies to be consulted)

The planning proposal does not propose consultation with other agencies or stakeholders. The views of adjoining industrial operators is of particular relevance as the change in zoning could compromise their future operations through land use conflict and lead to employment losses in the locality.

A community consultation and public exhibition period of 14 or 28 days has been suggested. Should the proposal proceed to gateway, a timeframe for exhibition will be determined by the Gateway.

3. VIEWS OF COUNCIL AND AGENCIES

3.1 Comments from Strathfield Council

On 19 July 2016, Council resolved not to support the planning proposal for the following reasons (Tab G):

- lack of a comprehensive Flood Study to support the zoning change;
- lack of detail and consultation with external agencies regarding the proposed Voluntary Planning Agreement;
- the proposed maximum height of 28m and maximum Floor Space Ratio of 1.85:1 are excessive considering the context of the site; and
- potential land use conflict between the proposed R4 High Density Residential zoning and neighbouring IN1 General Industrial zoning.

In addition, the Council resolved that the proponent be advised to amend the planning proposal to a maximum height of 12m and maximum FSR of up to 1.2:1, consistent with the established Strathfield LEP 2012 spatial hierarchy and to submit additional information to satisfy the flooding issues and voluntary contributions.

On 31 August 2016, the Department wrote to Council seeking additional comments. Council reiterated that it did not support the planning proposal for the same reasons outlined in its resolution to refuse the proposal (as outlined above) (Tab H).

4. PROPOSAL ASSESSEMENT

4.1 Strategic merit assessment

4.1.1 A Plan for Growing Sydney

In December 2014, the Department released *A Plan for Growing Sydney* (the Plan'), the long term strategic plan for metropolitan Sydney. Under the Plan, the site is located in the Central Subregion. No specific directions or goals apply to the site under the Central Subregion or the Plan. The site is not located in a strategic centre or urban renewal corridor, but is located in close proximity to other industrial land and the Enfield Intermodal Logistics Centre.

The proposal states it is consistent with the following three goals of the Plan:

- Goal 2 - A city of housing choices with homes that meet our needs and lifestyles:
 - the proposal will deliver appropriately located housing to meet Sydney's growth;
 - the proposal will accelerate urban renewal by converting existing underutilised light industrial land to medium density residential within a 35 minute commute to Sydney CBD; and
 - the proposal will deliver a variety of housing options that complement the detached houses that currently characterise the locality, and will include options for both first home buyers and older locals seeking to downsize from larger houses in the area;
- Goal 3 – A great place to live with communities that are strong, healthy and connected:
 - the proposal will contribute to the revitalisation of the Strathfield South residential area; and
 - the proposal will contribute to enhancing and expanding the existing open space network in the immediate area by making improvements to the Cooks River bank, the Cooks River Cycleway and by improving access to these spaces from within the site; and
- Goal 4 – A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources:
 - the proposed naturalisation of the Cooks River bank aligns with this priority. The asset will be enhanced to meet the goals of Sydney Water and Strathfield Council and will provide increased amenity for the local community.

The proposal is considered to be consistent with Goals 2 and 3 as the proposal will deliver additional housing stock and increase housing choice in an area that is in close proximity to established housing, services, jobs and local active and passive recreation areas, and which is somewhat isolated from the bulk of Strathfield's industrial and employment lands and access to it is via residential streets.

The proposal is inconsistent with *Goal 1- A competitive economy with world class services and transport*, as it will reduce the amount of employment land within the Strathfield local government area. It is considered that the impact the rezoning and loss of urban support services may have on the surrounding employment lands requires further assessment.

The proposal does not address the criteria contained in the 'Industrial Lands Strategic Assessment Checklist' (Action 1.9.2 of the Plan). This checklist is to guide any proposed rezoning of industrial lands in order to ensure evidence-based decisions and prevent encroachment on important industrial sites (further discussed at 4.1.3).

4.1.2 State Environmental Planning Policies

The planning proposal is generally consistent with, or can comply at the development application stage, the relevant SEPPs outlined in the proposal.

State Environmental Planning Policy No 55 – Remediation of Land

A contamination audit (Tab I) has been provided, which is based on the results of a 2007 site audit report (SAR) and site audit statement (SAS) to support a previous rezoning proposal for several sites in the Water/Dunlop Street precinct, including 7-33 Water Street. The previous proposal was for fourteen two to nine storey residential developments.

The subject site is located on top of a backfilled quarry. The audit notes the 2007 SAR found data was lacking in relation to several aspects however, these were for the most part considered acceptable to manage during remediation or as contingencies after remediation.

The concept design proposes two basement levels within the known footprint of the filled quarry. An analysis of the depth of various basements in respect to the groundwater table has yet to be performed. The audit recommends that:

- a more accurate delineation of the filled quarry boundary and assessment of landfill gas conditions in proximity to this boundary would be required if this depth of basement were to be retained in the area; and
- to be consistent with the previous remediation action plan, the basement depths should be maintained above the level of groundwater table within the footprint of the fill quarry.

It is considered that should the proposal address the above and the recommendations outlined in the audit, the proposal could be considered consistent with the requirements of SEPP 55.

4.1.3 Section 117 Directions

Direction 1.1 Business and Industrial Zones

The proposal is inconsistent with this Direction as it would reduce the on-going employment generating capacity of the site and reduce floor space currently zoned for industrial purposes.

The proponent has undertaken an Economic Impact Assessment (Tab J) of the planning proposal. This study discusses the implications of the loss of industrial land that would result from the proposal. The proposal states that it will result in an overall loss of only 0.7% of total employment lands supply in the Strathfield local government area and a loss of 71 jobs on the subject site (down from approximately 115 currently). The assessment has not considered whether there would be impacts from the change of use on the neighbouring and nearby industrial operations.

The Greater Sydney Commission's Industrial Precinct Review (Hill PDA, 2015), commissioned to inform District Planning, identified the Water Street precinct as being a mid-scale precinct of "good health". The Review states that, while Sydney's traditional manufacturing operations have moved either offshore or to lower value locations in Western Sydney, there is a growing and evolving demand for industrial areas within inner city and middle ring suburbs of Sydney to serve the needs of the growing local population (i.e. panel beaters, council depots, vehicle repairs and household trades) and strategic centres (i.e. data centres, archives, utilities, concrete batching plants and distribution centres). The study supported the diversification of industrial uses within the precinct.

Strathfield Council has prepared a residential study and economic study (discussed further in 4.1.5) which considered the Water/Dunlop Street industrial area, concluding that residential could be supported subject to further investigation of alternative uses for the precinct and that there is a need for a precinct wide approach to ensure an equitable outcome for landowners.

Direction 3.1 Residential Zones

The proposal is generally consistent with this Direction as it would deliver additional housing stock and increase housing choice in an area that is close to existing housing, services, jobs and local active and passive recreation areas.

Direction 3.4 Integrating Land Use and Transport

The proposal is generally consistent with this Direction as it would provide additional housing in close proximity to jobs and the site is well serviced by several bus routes.

Direction 4.3 Flood Prone Land

The proposal is considered to be inconsistent with this Direction as it has failed to address this direction in adequate detail. Whilst the applicant has included a Flood Impact Assessment (Tag K) and the assessment makes recommendations on how the flood risk can be generally managed, it does not address the proposal's ability to comply with the Floodplain Development Manual 2015, as outlined in the Direction. The issue of flooding is discussed further below (section 4.3.1).

Direction 7.1 Implementation of the Metropolitan Plan

The proposal is consistent with the goals and objectives relating to the delivery of additional and diverse housing for Sydney.

However, the proposal is considered to be inconsistent with the directions relating to employment land and the protection of business and industrial zoned land, including land that is currently providing urban support services. The proposal may also impact on the viability of other industrial uses in the immediate and surrounding areas.

It is relevant to note that a planning proposal may be inconsistent with this priority but still be acceptable if it achieves the overall intent of the Plan and does not undermine the achievement of its vision, land use strategy, policies, outcomes or actions.

The proposal does not include an assessment against the Industrial Lands Strategic Assessment Checklist, as required in A Plan for Growing Sydney. The Department of Planning and Environment's assessment against the checklist is below.

1. Is the proposed rezoning consistent with State and/or council strategies on the future role of industrial lands?

The proposal is inconsistent with State strategies relating to employment and industrial lands, including land that provides urban support services, as it will result in the reduction of well-located employment land and industrial floor space. The proposal is inconsistent in terms of the staging of Council's Strathfield Residential Land Use Study (November 2011) and Strathfield Economic Land Use and Employment Strategy (June 2010), as both studies recommend further investigation is needed before any development occurs. However, these studies identify the precinct as having potential for future urban development.

It is noted that Council's strategies support the rezoning of the site, in conjunction with the wider Water/Dunlop Street Industrial precinct for low and medium residential purposes, subject to further investigation relating to alternate uses for the site and adequate management of flooding and contamination issues. The local strategies should be carefully considered as part of the proposal as these provide finer grain evidence than the broader plans contained at State or district level.

2. Is the site:

- *near or within direct access to key economic infrastructure?*
- *contributing to a significant industry cluster?*

The site is 1.2km to the Enfield Intermodal Logistics Centre (Figure 2). The site is 550m to Liverpool Road/ Hume Highway. The site does not have direct access to the Intermodal.

The site currently forms part of an IN1 General Industrial precinct. It is estimated that the subject site provides 115 jobs. The site is approximately 1.9ha and the precinct covers approximately 5.5ha.

3. How would the proposed rezoning impact the industrial land stocks in the subregion or region and the ability to meet future demand for industrial land activity?

The site represents 0.7% of the employment lands within the local government area. The rezoning would not significantly impact upon the industrial land stocks within the region and the ability to meet future demand for industrial land activity.

4. How would the proposed rezoning impact on the achievement of the subregion/region and LGA employment capacity targets and employment objective?

As stated above, the site represents a small proportion of employment land available within the local government area. The proposed rezoning would not significantly impact upon the achievement of regional or local government area employment capacity targets and industrial objectives. However, the proposal may have implications for the continued future of the remainder of the Water/Dunlop Street industrial precinct. On this basis the application should consider the entire precinct.

5. Is there a compelling argument that the industrial land cannot be used for an industrial purpose now or in the foreseeable future?

The proposal's main argument for rezoning is centred on the outcomes of Council's Strathfield Economic Land Use and Employment Strategy and Residential Land Use Study. These studies recommend a rezoning of a site, but concluded that further investigation into alternative uses of the site be carried out as well as further investigation to support the conversion of this land for residential purposes. The proposal does not include a discussion of how the site may be used for other industrial or business related purposes.

6. Is the site critical to meeting the need for land for an alternative purpose?

The site is not critical to meet any future residential targets or retail/commercial space goals.

4.1.4 Draft Central District Plan

The Draft District Plans were released on 21 November 2016 and the proposal has been assessed against the priorities and actions of the draft Central District Plan.

The proposal is consistent with Liveability Action 3, which aims to increase housing supply and choices by requiring Strathfield Council to implement the following actions:

- monitor and support the delivery of Strathfield's five-year housing target of 3,650 dwellings;
- manage the competing demands for residential and enterprise lands; and
- investigate local opportunities to address demand and diversity in and around local centres and infill areas with a particular focus on transport corridors and other areas with high accessibility.

The proposal is inconsistent with Productivity Action 5, which aims to protect and support employment and urban services land. The draft plan states that a precautionary approach should be taken to the conversion of employment and urban service lands, unless there is a

clear direction in A Plan for Growing Sydney or an alternative strategy endorsed by the relevant planning authority. While the proposal is not consistent with the priorities for the Central Subregion in A Plan for Growing Sydney in relation to loss of employment land (as discussed above), Council's Economic Land Use and Employment Strategy (as further discussed in section 4.1.5) noted support for residential conversion subject to a review of alternative land uses and to a comprehensive approach to redevelopment across the precinct.

The draft plan further notes that employment and urban services zoned land supports activities that are central to Sydney's productivity, sustainability and liveability, and existing industrial, manufacturing, warehousing and distribution industries serve a vital role in supporting the employment network in the Central district.

4.1.5 Local Strategy

Strathfield Council prepared a residential study (November 2011) and an economic study (June 2010) to support the comprehensive Strathfield LEP 2012. Both studies considered the Water/Dunlop Street industrial area should be further investigated for alternative land uses and suggested support for conversion for residential purposes subject to a comprehensive redevelopment approach for the entire precinct and the acceptable management of flooding and contamination issues. Should the planning proposal progress to the Gateway, this would provide an opportunity to undertake these further investigations.

Strathfield Residential Land Use Study (JBA November 2011)

Council's Residential Land Use Study identified the Water/Dunlop Street industrial precinct as forming part of the South Strathfield precinct, characterised by a high level of residential amenity and with a low scale residential nature that should be protected. The Water / Dunlop Street industrial area is somewhat isolated from the bulk of Strathfield's industrial and employment lands and access to it is via residential streets. Whilst the precinct is not within walking distance of a rail station, it is serviced by bus access to the station. The Water / Dunlop Streets industrial area was identified as having contamination and flooding issues. The study concluded that further investigation is needed to support the conversion of this land for residential purposes and that this support would be subject to acceptable management of flooding and contamination issues.

Strathfield Economic Land Use and Employment Strategy (SGS June 2010)

Council's Economic Land Use and Employment Strategy sought to improve the knowledge of Strathfield's economic base and investigate the issues facing the Strathfield LGA. The Strategy focused on how new jobs could be encouraged through appropriate land use planning and identified tools to protect business and industrial areas. The study identified the need to modernise planning controls to reflect local circumstances and the changing nature of employment. The Water/Dunlop Street precinct was identified as one such site for investigation (Action 6.1 - Consider alternative planning controls for Water Street/Dunlop Street).

The strategy states that "more work is required to investigate alternative uses for the Water Street/Dunlop Street Precinct" and that "there is a need for a precinct wide approach to ensure an equitable outcome for landowners". Alternatives should include land pooling and designation of flood affected land as parkland so as to expand the open space corridor along the Cooks River whilst allowing a comprehensive redevelopment of the precinct. It identified the surrounding residential areas as being negatively affected by the adjacent industrial activities and offered poor residential amenity. The strategy states that "a coordinated redevelopment of the precinct will result in high quality, medium density residential development and improved open space links along the Cooks River." The strategy suggested that it be investigated whether the State Government can contribute towards funding the open space link along the Cooks River.

Department of Planning and Environment's views on strategic merit

The proposal has demonstrated sufficient strategic merit in line with a Plan for Growing Sydney (Goals 2 and 3) and the draft Central District Plan (Liveability Action 3) to warrant its consideration by the Sydney Central Planning Panel, as it would provide additional housing at a location that is relatively accessible for residential traffic but constrained for industrial traffic. It will also result in an overall loss of only 0.7% of total employment lands supply in the Strathfield local government area.

However, the proposal raises concerns in relation to the draft Central District Plan's productivity priority requiring a precautionary approach to the conversion of employment and urban services land. Council's strategic residential study (2011) and economic study (2010) supports residential redevelopment subject to reviewing alternative uses and to a comprehensive precinct-wide approach. The proposal has not sufficiently addressed the cumulative impact that the loss of this precinct would have on the adjacent and nearby industrial areas, including the Enfield Intermodal Logistic Centre. The proposal is currently considered to be inconsistent with Section 117 Direction 1.1 Business and Industrial Zones as it would result in the reduction of the on-going employment generating capacity of the site and a loss of 71 jobs (down from approximately 115 on the subject site currently). The proposal is currently considered to be inconsistent with Section 117 Direction 4.3 Flood Prone Land as the proposal does not adequately address the flooding issues that are present on site. However, given Council's specific investigations on the suitability of future redevelopment on a precinct wide basis, it is considered that should the proposal be recommended to proceed to the Gateway, these matters could be further investigated in an amended planning proposal that could address the broader Water/Dunlop Street industrial precinct, prior to community consultation.

4.2 Site-Specific merit assessment

4.2.1 Existing use of land

The subject site is located at 7-23 and 25-33 Water Street (the site) and forms part of the Water/Dunlop street industrial precinct. At present the site has several industrial buildings which are currently used for low intensity industrial purposes. To the north of the site there are 1-2 storey residential dwellings that are zoned R2 Low Density Residential, to the west there are several industrial properties that are currently used for low intensity industrial purposes, to the east there are a series of 1-2 storey residential dwellings, Ford Park and a 3-storey residential flat building, and to the south there is an electrical transmission tower and power lines and the Cooks River, which includes a walk and cycle way.

The following development controls apply to the site:

Control	Explanation
<i>Zoning</i>	IN1 General Industrial
<i>Building height</i>	12 metres
<i>Floor space ratio</i>	1:1

4.2.2 Proposed use of land

The planning proposal seeks to rezone the site and amend the maximum building height and floor space ratio. The proposal intends that the site is redeveloped for 5 residential flat buildings ranging in height from 4 to 8 storeys. This would provide approximately 361-371 apartments, and 579-607 basement car parking spaces. The final number of apartments and parking spaces would be determined by a future development application, should the proposal proceed.

The planning proposal seeks to amend the development controls for the site to the following:

Control	Explanation
<i>Zoning</i>	R4 High Density Residential
<i>Building height</i>	28 metres
<i>Floor space ratio</i>	1.85:1

As part of Council's resolution to refuse the proposal, the following controls for the site were identified:

Council Alternate Controls	Explanation
<i>Zoning</i>	R3 Medium Density Residential
<i>Building height</i>	11 metres
<i>Floor space ratio</i>	0.9:1 (1.2:1 subject to a supporting Voluntary Planning Agreement)

Council considered that the revised controls were consistent with the SLEP 2012 strategic planning framework and other R3 Medium Density Residential zoned precincts adjacent to the Strathfield South Town Centre and Belfield Local Centre.

4.3 Natural Environment

There are no known critical habitats, threatened species or ecological communities within the site which will be affected by the proposal. However, potential site contamination, arising from the previous and existing use of the site for industrial uses are issues that have not adequately been addressed or considered.

4.3.1 Contamination and flooding

The proposal includes a Contamination Report, which is reliant on information that is more than two years old and is for a different proposal ([Tab I](#)). The proposal also contains a Flood Impact Assessment, which states that the site is subject to both local overland flows from the north and mainstream flooding from the Cooks River ([Tab K](#)). The site is vulnerable to flash flooding (the modelled Probable Maximum Flood would peak 1.5 hours after the commencement of rain, but begin to inundate the ground at the site after just 25 minutes). Evacuation of the site is not considered practical and evacuation to higher floor levels is considered to be a safer course of action.

Should the proposal proceed to gateway, it is recommended that a comprehensive flood study, an updated contamination report and consultation with the State Emergency Service be required.

4.4 Services and infrastructure

4.4.1 Public Transport

The site has access to several bus routes that provide services to Strathfield Station, which link the site to Parramatta and Sydney CBD. The site is located in close proximity to the Cooks River cycleway.

4.4.2 Traffic and car parking

The planning proposal was submitted with a transport impact assessment, which was undertaken by GTA Consultants. The report has been based off a development consisting of 361 residential apartments, with 579 car spaces. Should the proposal proceed to gateway, it is recommended that the transport impact assessment be updated to reflect the final proposal apartment and car parking spaces configuration.

4.4.3 Infrastructure and Services

As the site has already been developed, the land is already serviced. Given the age of the existing development and the significant uplift proposed, consultation with utility providers would be required to ascertain capacity of existing infrastructure.

4.5 Other relevant matters

4.5.1 Visual Impact / Overshadowing

Shadow diagrams indicate the proposed controls would not have a significant impact on solar access to neighbouring properties. Any shadows generated by the redevelopment fall within the existing shadow footprints created by the current developments. The Council officer's report notes that they consider the potential overshadowing impact on Cooks River Cycleway/Open Space link is excessive.

The Department notes that the site is surrounded by low density residential and industrial uses. The proposed height limit of 28m, allowing up to 8 storey development, is considered to be a significant increase compared to the existing development, with potentially significant visual impacts upon the adjacent residential developments.

4.5.2 Electromagnetic Radiation and Acoustic

The proposal includes an electromagnetic radiation report (Tab L), given the proximity to high voltage power lines. It concludes that a) no habitable rooms should be located within 11 radial metres of the power lines; b) no unreasonable magnetic field will occur beyond 23 radial metres of the power lines; and c) mitigation measures will need to be applied between 11 and 23 radial metres of the power lines to mitigate the otherwise unacceptable magnetic fields, which would affect general electronic and medical equipment.

The proposal also includes an acoustic assessment (Tab M), which found that, based on the location of the site and the surrounding roadways and land use activities, the project will be able to comply with the relevant noise level criteria using standard single glazing.

Department of Planning and Environment's views on site specific merit

The Department notes a number of specific merit issues, including the height and scale relationship of the development with the low density residential scale and character of the area, and potential amenity impacts on new residents arising from adjoining industrial operations, flooding, contamination, and electromagnetic radiation from nearby high voltage power lines.

5. BACKGROUND SUPPORTING INFORMATION

5.1 Adequacy of existing information

The planning proposal is supported by the following documentation:

- Pre-Gateway Review Application Form, Urbis, August 2016.
- Cover Letter, Urbis, August 2015
- Planning Proposal, 7-33 Water Street, South Strathfield, Urbis, April 2016 (as refused by Council).
- Council's Planning Committee Meeting Agenda and Minutes, July 2016
- Council Notice, July 2016
- Urbis Correspondence with Mayor of Strathfield, July 2016
- Council's pre-lodgement correspondence, July 2015 and September 2015
- Architectural Drawings, Robertson + Marks Architects, January 2016
- Design Report, Robertson+ Marks Architects
- ADG Compliance Table, Urbis
- Urban Design Study, GMU Design, March 2016
- Transport Assessment, GTA Consultants, March 2016
- Flood Impact Assessment, WMA Water, November 2015

- Contamination Assessment, Ramboll Environ, March 2016
- Preliminary Arboriculture Assessment, Tree Consulting by Jo, December 2015
- Economic Assessment, Hill PDA
- Acoustic Assessment, Acoustic Logic, March 2016
- Electromagnetic Radiation Report, EMC Services, March 2016

Is the supporting information provided more than 2 years old?

Yes ☒ No ☐

If 'yes', explain/detail currency of information

- The Contamination Audit Report is based on a report undertaken in March 2007. An assessment of its validity is provided in section 4.1.2 of this report.

Is there evidence of agency involvement in the preparation of any supporting information or background studies?

Yes ☐ No ☒

5.2 Requirement for further information

No further information is required.

CONCLUSION

The proposal has demonstrated strategic merit in its delivery of additional and diverse housing for Sydney at a location that is relatively accessible for residential traffic but constrained for industrial traffic. This is consistent with the housing directions within A Plan for Growing Sydney, draft Central District Plan and Council's local strategy. There is sufficient strategic merit for referral to the Sydney Central Planning Panel for independent review.

It is recommended that, should the proposal proceed to Gateway, the planning proposal be expanded to include the whole of the Water Street/Dunlop Street Precinct and include investigation of inconsistencies with the relevant Section 117 Directions (and subsequently released draft Central District Plan) in relation to:

- the loss of industrial land and the impact of rezoning the whole of the industrial precinct (versus the proposed partial precinct) on the future operations of the industrial/business precinct and nearby industrial areas including the Enfield Intermodal logistics centre;
- addressing flooding, contamination, and electromagnetic radiation from nearby high voltage power lines, and opportunities for enhancing open space provision and connections with the adjacent Cook River open space network; and
- suitable zoning, scale and density in relation to visual and amenity impacts within the precinct site and on adjoining low density residential uses.

Endorsed by:



Karen Armstrong 15/2/17
Director, Sydney Region East



Stephen Murray
Executive Director, Regions

16 February 2017



Marcus Ray
Deputy Secretary
Planning Services

23/02/2017