

Jannali No.1 Pty Ltd

A.C.N 617 516 837

P.O Box 356
Chester Hill NSW 2162

24 May 2024

Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy St,

Parramatta, NSW 2150

Attn: Kimberley Beencke

Re: Written Justification of Strategic and Site-Specific Merit: 544-550 Box Rd, Jannali NSW 2226 - PP-2023-2683

Dear Kimberley

At the time of preparing this response, the planning proposal has not been presented to the Council's Planning and Growth, Infrastructure and Operations, Shire Services and Corporate Governance meeting. This is scheduled to be held on 3 June 2024.

However, the proponent received initial written feedback from the Council concerning the planning proposal that indicated the Local Planning Panel was not supportive for the following reasons:

- Jannali has not been identified by the LSPS or District Plan as a centre for growth
- In the absence of an overall centre approach to height and density, the proposal lacks merit.
- Unacceptable impacts of building bulk and scale on adjoining low-density land – transition/context, lack of built form analysis.
- Bulk & Scale/ ADG compliance issues – lacks site-specific merit.
- Design not well resolved – edge of centre, poor relationship to adjoining land.
- Any increase in density should be the result of a holistic/strategic approach to the entire centre–place plan.

A copy of the Council's correspondence (*Email - Sutherland Shire Local Planning Panel Meeting - 02 April 2024*) is included in the documentation folder provided.

The planning proposal was considered by the proponent in light of the relevant strategic plans as well as an analysis of the site's attributes and the initial response to the Council's comments are outlined below:

The site is located within the Jannali Local Centre under the Sutherland Shire Local Strategic Planning Statement. Whilst Jannali is not specifically identified as a centre for growth such as Sutherland-Kirrawee, there is strategic merit that Jannali, Sutherland and Kirrawee should be considered one growth centre. Jannali boundary is one (1) kilometre from Sutherland

¹ Source documents are included in documentation folder titled "Referenced Source documents"

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Train Station, and the distance from Sutherland Train Station to Kirrawee's boundary is 870m, therefore it is the proponent's submission that Jannali should be considered as part of the Sutherland-Kirrawee growth centre.

All local centres also play an important role as they include public transport, access to goods and services, employment, as well as social and community infrastructure close to where people reside.

544-550 Box Road, Jannali "**The site**" is located approximately 160m from the Jannali Railway Station which services the T4 Line (Bondi Junction to Waterfall/Cronulla) and the South Coast Line (Bondi Junction/Central to Bomaderry/Port Kembla), and 70m from two bus stops, serving the route Nos. 967 and 968, to Miranda Town Centre.

Jannali Train Station has recently undergone significant redevelopment and upgrade as part of the Transport Access Program (TAP) which is a NSW Government initiative to provide a better experience for public transport customers by delivering accessible, modern, secure and integrated transport infrastructure.

Jannali Train Station, through the TAP, was upgraded to have a design capacity of 7,979 visitors per day (*source: Cardno - Jannali Station Precinct Accessibility Upgrade Traffic, Transport and Access Impact Assessment 23/3/2015, pg 17*)¹. Currently, in December 2023 Jannali Train Station patronage was calculated at total of 2,908 entries and exits per day (*source: <https://patronage.will.au/nsw/stops/train/jannali>*)¹ demonstrating Jannali's existing infrastructure is significantly underutilised.

The planning proposal will increase the residential capacity in the area to align with forecast growth in the LGA, in an area with good access to an underutilised public transport system. This will in turn contribute to the local economy, with future residents being serviced in the Jannali Local Centre.

It is noted that there is a recent planning proposal for 42A Railway Crescent Jannali for commuter car parking, which will form part of an integrated mixed-use development. There are also development approvals for multi-storey residential flat buildings at Nos. 11-15 Mitchell Avenue, 17-23 Mitchell Avenue, and 34-38 Railway Crescent. These developments demonstrate that Jannali is evolving into a more densely populated area, with the character evolving from freestanding single dwellings to higher-density residential development. These have been designed to increase residential capacity and coupled with the planning proposal for the subject site indicate a need for an overall Centre plan for Jannali. These examples together with previous Government investment in infrastructure should provide the impetus for planning reform for the area.

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The E1 Local Centre zone in Jannali in which the site is located is surrounded to its east, south and part of its west by R2 low-density residential zoned land, with a portion of its northern edge adjoining R3 zoned land. Given the larger size of Jannali Local Centre, a rezoning review of the Jannali Centre and immediate surrounds should be considered to make better use of the local infrastructure, provide transition at the zone interface, improve housing choices and stimulate much-needed economic development for the Jannali Centre. As indicated above, the recent planning proposal, development approvals in the locality and the planning proposal for the subject site would provide the impetus for this.

Concept drawings were prepared as part of the planning proposal, to demonstrate what type of development could be anticipated on the site. However, this represents only one iteration of possible development. If the planning proposal for an increase in the building envelope (by way of increased height and FSR) is approved, any future DA for a development on the site would provide more fulsome detail to address bulk and scale, and ensure compliance with the Apartment Design Guide.

A written outline of the strategic and site-specific merit of the planning proposal is included in a condensed form as a separate attachment – *Appendix A*. This should be read in conjunction with the more comprehensive original written planning proposal submission by GSA Planning that forms part of this rezoning review application.

Best Regards

Yours faithfully



Brett Matterson

0425 247 004

Director

Jannali No.1 Pty Ltd (Applicant)

¹ Source documents are included in documentation folder titled "Referenced Source documents"

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Appendix A

¹Source documents are included in documentation folder titled “Referenced Source documents”

This document has been in part extracted from the comprehensive Planning Proposal report by GSA Planning, which should be read in conjunction with this document, and in full.

Strategic Merit

The planning proposal has strategic merit for the reasons detailed in the following assessments, as outlined in **Table 1: Strategic Merit Test**.

| TABLE 1: STRATEGIC MERIT TEST | |
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| Criteria | Planning Proposal Response |
| Section A: Need for the Planning Proposal | |
| <i>Is the planning proposal a result of an endorsed LSPS, strategic study or report?</i> | <p>Yes, the proposal is informed by analysis of the site's physical and environmental attributes with consideration of the relevant strategic plans, outlined below.</p> <p>These reports and studies justify the works proposed in conjunction with the amendments to the LEP building height and FSR controls in the planning proposal.</p> <p>Greater Sydney Region Plan: A Metropolis of Three Cities & South District Plan The Strategic Context for the planning proposal discusses 'A Metropolis of Three Cities' and the characteristics and goals of the <i>South District Plan</i> in relation to the subject site. The site is located within the Jannali Town Centre, a significant centre with railway and bus connections. The planning proposal achieves the goals and meets the priorities within the <i>South District Plan</i>, as follows:</p> <ul style="list-style-type: none"> • The site is within the Jannali Local Centre, which provides a range of mixed uses that service the local community. Jannali Local Centre is approximately 20km south-west of the Sydney CBD and is located on a railway line that provides connectivity to Hurstville. It is considered as a 'Strategic Centre' in the <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i>. • The site is two kilometers of the Sutherland Town Centre, which is identified as a 'Strategic Centre' in the <i>South District Plan</i> and the <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i>. • Jannali train station and bus stops are within five minutes' walking distance. • The proposal will continue to support the economic role and activity of Jannali Local Centre. • The planning proposal will align with key NSW State Government strategic aspirations to create a 30-minute city by locating more housing and employment close to public transport. • The planning proposal offers the opportunity to deliver a more diverse housing typology to the Jannali Town Centre, contributing to the existing character and urban fabric. • The proposal will fully integrate the surrounding movement network enabling access to retail and commercial uses on the site for the wider community, while providing excellent connectivity for future residents. • The proposal seeks to enhance the legibility of the site within the streetscape and enhance the pedestrian experience, while contributing to the street activation of the site. <p>The planning proposal will make a positive contribution to the revitalisation of the Jannali Local Centre, by increasing employment, services offered, and additional housing, close to a transport hub.</p> <p>The Sutherland Shire Local Strategic Planning Statement (LSPS) The <i>Sutherland Shire LSPS</i> was released by Sutherland Shire Council in September 2020. The document sets out a 20-year land use vision, nominating a series of planning priorities for the LGA. Included is a local vision to guide future development, which nominates local planning priorities and associated strategies and actions.</p> <p>Planning priorities and strategies set out in the <i>Sutherland Shire LSPS</i> include Infrastructure and Collaboration along with an ambitious active transport vision nominated for the area. Liveability and housing choice are also key aspects of the LSPS. The site's potential to meet the strategies and planning priorities of the LSPS, are as follows:</p> |

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| | <p><i>The subject site is located within approximately 150 meters of the Jannali railway station.</i></p> <p><i>The subject site has excellent access to open space and community facilities. Delivering a mixed-use development on the site is consistent with the current E1 land use zone objectives. Further increasing the population of the site ensures a more vibrant and active town centre, an economically more robust centre, and a centre that satisfies key NSW State Government Policy for delivering housing close to public transport.</i></p> <p>The subject site is located within the Jannali Local Centre and will align with desired opportunities for the locality by increasing the Centre's residential capacity to accommodate forecast residential growth. The proposal will contribute to the local economy with additional residents utilising the Jannali Local Centre. This is consistent with Planning Priority 10 'Housing Choice', which notes:</p> <p><i>Recent community feedback indicates support for a concentrated approach to housing density in preference to a dispersed model¹³. Increased residential density close to centres is efficient, with new dwellings within easy walking distance of a public transport hub, community facilities, shops, services and employment. This supports local shops and businesses, sporting groups, cultural and community organisations. Many younger people also want to live in smaller dwellings close to centres for cost, convenience and proximity to social activities.</i></p> <p><i>Planning for a mix of housing forms and densities will balance growth with preserving the natural environmental qualities. The established density gradient and landscaped character will be generally maintained, with the lowest residential densities in waterfront and peninsula locations and where there is bushfire risk. The R2 Low Density Residential and R3 Medium Density Residential zones will continue to accommodate increased residential densities while retaining the predominantly low density scale and open landscaped character.</i></p> <p>Accordingly, in our opinion, the planning proposal has considered strategic reports and studies applicable to the subject site and its local centre.</p> |
| <p><i>Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?</i></p> | <p>OPTION 1 – Do Nothing</p> <p>This option does not promote the economic potential of the site, which is currently a fraction of the site's development potential. The current height and FSR development standards applicable to the site do not offer the most beneficial return on investment to redevelop the site. This is evident by original buildings remaining, rather than being redeveloped. Additionally, unless new, well-designed developments are encouraged and approved, the locality might decline.</p> <p>OPTION 2 – Lodge a Development Application</p> <p>Lodging a development application such as the indicative proposal would require two Clause 4.6 Applications to Vary the Development Standards for building height and FSR. These would be departures of approximately 50% for building height; 90% for FSR. These are significant variations for a Local Planning Panel to determine, and therefore a planning proposal was considered an appropriate method to achieve the desired outcome.</p> <p>OPTION 3 – Planning Proposal</p> <p>The planning proposal will enable redevelopment of the site at a scale which achieves an appropriate economic return for the site. Jannali Local Centre will be better utilised, by providing additional housing in a well-connected transport, retail, and commercial hub.</p> <p>The planning proposal is the best means to achieve the intended outcomes of increased maximum building height and floor space ratio for the site. The planning proposal will achieve the LEP objectives for height and FSR.</p> |
| <p>Section B: Relationship to the Strategic Planning Framework</p> | |
| <p><i>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)</i></p> | <p>A Metropolis of Three Cities</p> <p><i>The Greater Sydney Region Plan: A Metropolis of Three Cities</i> was released in 2018 to guide Sydney's long- term growth.</p> <p>The plan identifies three cities for the Greater Sydney Region with the subject site being located in the Eastern Harbour City.</p> <p><i>A Metropolis of Three Cities</i> states that the population of Greater Sydney is projected to grow to 8 million people over the next 40 years. It is essential that residents have quick and easy access to jobs and essential services. Housing supply and choice will need to increase accordingly to meet the growing and changing needs of the community. In response to this, the planning proposal emphasises the increased housing supply, which is close to a public transport hub, in this case being Jannali train station. The Proposal will update the built form and provide new housing, compared to the existing situation on the site.</p> |

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| | <p>The planning proposal is consistent with Objective 10 of this Plan, as follows, inter alia:</p> <p><u>Objective 10: Greater housing supply.</u> Ongoing housing supply, with a range of housing types in accessible and well-serviced locations will create more liveable neighbourhoods and support Greater Sydney's growing population. The NSW Government has identified that 725,000 additional homes will be needed by 2036 to meet demand based on current population projections.</p> <p>Accordingly, the planning proposal aligns with this objective through accommodating 44 well-designed residential apartments on the site. A future DA will ease demand for a mix of new housing stock and contribute to increased housing supply targets within the LGA and Eastern City.</p> <p>The planning proposal has the potential to provide contemporary apartment-living, appealing to a mix of young professionals, singles and couples, and downsizers. The central location of the site; near a range of train and bus services, employment lands, retail services, and recreational areas; are aspects that further enhance the viability to increase the capacity of the site.</p> <p>The planning proposal is an opportunity for contemporary new apartments close to transport links and employment opportunities. Studio and one-bedroom apartments are likely to appeal to younger professional singles and couples, with the 20–34-year-old demographic currently making up 17.1% of the population in Sutherland [source: 2021 Census QuickStats: Sutherland].</p> <p>Importantly, the planning proposal will provide residential apartments with the capacity to accommodate downsizers, allowing Sutherland and Jannali residents to continue to age in place.</p> <p><i>South District Plan</i> In March 2018, the Greater Cities Commission (GCC) released the <i>South District Plan</i> which is a long-term plan to manage growth in the context of economic, social, and environmental matters; ultimately outlining a 40-year vision for Greater Sydney. The subject site is located within the <i>South District Plan</i>. The overall vision involves achieving a liveable, productive, and sustainable future for the district.</p> <p>Jannali is identified as a "local centre" in the <i>South District Plan</i>, which provides an opportunity to increase capacity for the required goods and services of Jannali and the broader community, as well as both employment and housing uses.</p> <p>Local centres are important to functioning neighbourhoods as they include public transport and transport interchanges. They are an important part of a 30-minute city. Local Centres provide local employment and essential local functions, access to goods and services, social or community infrastructure as well as transport interchanges close to where people live. Recent approvals for other mixed-use or residential flat building developments, demonstrate the desirability of and demand for residential dwellings close to the Jannali Local Centre.</p> <p>The planning priorities and corresponding actions that are relevant to the planning proposal include the following, inter alia:</p> <p><u>Planning Priority S1: Planning for a city supported by infrastructure.</u> The site is well-serviced by bus stops, approximately 70m walking distance from the subject site, with regular services to the Miranda Centre, Oyster Bay Shops, and other destinations. The site is approximately 150 meters from Jannali Train Station, which provides access to the CBD and surrounding suburbs. The existing transport infrastructure ensures the site is accessible for residents and visitors.</p> <p>The site's proximity to local schools, employment, hospitals, medical services, parks, and other facilities and services will benefit future residents and workers. It is unlikely the Proposal will directly affect the provision of public infrastructure or significantly increase demand. Therefore, the proposal is consistent with the objectives for this priority.</p> |
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Planning Priority S4: Fostering healthy, creative, culturally rich and socially connected communities.

The planning proposal seeks to increase both the retail floorspace and the residential capacity in Jannali. The Proposal is consistent with the following actions in the Plan which foster strong local communities through a place-based planning approach:

Action 10: Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities.

Future shop top housing development on the subject site will feature adaptable apartments and lift access, ensuring it will be a safe and inclusive place for people of all ages and abilities. Increased residential uses near the centre is an important factor in maintaining Jannali's level of liveability and the viability of the Local Centre.

Planning Priority S5: Providing housing supply, choice and affordability, with access to jobs, services and public transport.

A future development application will provide short-term local employment opportunities during the construction phase. Approximately 44 residential units on the site will ensure that potentially affordable housing and variety is available to the community, with easy access to shops, services and public transport.

Planning Priority S6: Creating and renewing great places and local centres and respecting the District's heritage.

Jannali is identified as a local centre in the *South District Plan*. It is intended the planning proposal will allow renewal, and increased retail and residential accommodation in the Centre.

The proposal is consistent with the following actions in the Plan which seek to foster strong local communities through a place-based planning approach:

Action 18: Using a place-based and collaborative approach throughout planning, design, development and management, deliver great places.

Action 21. Use place-based planning to support the role of centres as a focus for connected neighbourhoods.

The planning proposal will ensure that a collaborative approach is taken throughout each phase of the planning, design, development and management process.

The concept design addresses Box Road and Roberts Street and will better contribute to the streetscape. The concept form will increase available residential accommodation, which is important to enhance the Jannali Local Centre, making it an appealing place where people want to live, and that meeting the needs of residents. The planning proposal facilitates future redevelopment to achieve that outcome.

In our opinion, the planning proposal is consistent with the relevant goals and priorities of the *South District Plan*.

Draft Sutherland Shire Local Housing Strategy

The *Draft Sutherland Shire Local Housing Strategy 2041* was presented to Council's Planning and Growth Committee on 5 June 2023 and at time of writing, has not yet been adopted. The Housing Strategy is an action of Council's LSPS and is in line with the strategic priorities of Council's Community Strategic Plan.

The Strategy identifies the terrain and other constraints of the Shire, which limit locations for future housing to existing urban areas. While there is opportunity to increase density in the R2 Low Density Residential and R3 Medium Density Residential Zones, the Strategy notes:

'The greatest access to regular public transport services and the highest levels of walkability are around the established centres serviced by public transport. These are the optimal locations for future housing supply, although some neighbourhoods are constrained by other factors such as bushfire risk.'

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| | <p>The Jannali Centre provides optimal opportunities for additional housing close to transport and is not constrained by bushfire risk or other issues. As noted in this report, the Jannali Station is a rail stop on two separate railway routes which reduces train changes for commuters. Buses also service the Jannali Centre, making the location extremely convenient for commuters.</p> <p>The preferred housing mix identified in submissions to the Strategy included 20% of housing being greater than six storeys, which is eminently suitable for a Local Centre; and 31% overall, for apartments. More commercial/residential mixed-use developments were also suggested. Apartments allow residents to move to larger or smaller homes without leaving their community, to accommodate lifestyle needs or changing personal circumstances. As the Strategy noted:</p> <p><i>This allows more dwellings to be provided in those areas [in and around Centres] while preserving the lower density areas of Sutherland Shire from significant change. ... The community also recognised that apartments provide a more affordable [opportunity] for those looking to enter the housing market.</i></p> <p>It is noted the Strategy commits Council to create capacity for new apartments through changes to zones or changes to height and floorspace, as proposed by this application, stating:</p> <p><i>These will be focused along the central transport spine in the eastern part of the Sutherland Shire, so that in future residents will benefit from easy access to retail, services, transport, schools, recreation facilities and employment opportunities. Experience has also shown that concentrating change in specific precincts also increases the likelihood of the development potential being realised. This results in the whole precinct undergoing change at the same time and minimises the overall impact of change across Sutherland Shire.</i></p> <p>The typology proposed: apartments greater than six storeys, is very appropriate for a Local Centre well-served by public transport, as per the subject site. This type of development can improve the vitality and viability of the Jannali Local Centre.</p> <p>The planning proposal is consistent with the Objectives for Apartments, as follows:</p> <p><i>Objective 1: Support residents' choice to live in the form of housing they want as their life circumstances change, in locations where they can maintain community connections.</i> Response: The Jannali Local Centre is an opportunity to provide additional housing which is potentially suitable for first homeowners, downsizers and those who prefer apartment living. Council will prepare a Place Plan with housing growth in this area and</p> <p><i>Objective 2: Manage change to keep valued landscape and scenic qualities.</i> Response: Focussing new development in the Jannali Local Centre will preserve the local character and natural environment of the lower density areas surrounding the centre.</p> <p><i>Objective 3: Recognise that people have differing needs and circumstances and support opportunities for affordable and secure housing.</i> Response: Amending the Building Height and FSR standards for the Jannali Centre will allow additional, more affordable housing for Jannali.</p> <p><i>Objective 4: Ensure new homes do not expose residents to known natural hazards and allow residents to cope with changing climate and adopt emerging technologies.</i> Response: The site is not known to be flood prone and a future DA will incorporate additional water storage and utilise re-use for stormwater management and water conservation. The concept proposal demonstrates a future building can achieve passive design for solar access, air movement general amenity. The concept proposal includes waste handling areas for residents and retail tenants.</p> <p>This planning proposal and the concept proposal including demonstrate the Jannali Local Centre is due for intensification of uses, is ideally located for shop top housing, and upgrading of retail floorspace.</p> |
| <p><i>Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local</i></p> | <p>Sutherland Shire Local Strategic Planning Statement 2020 The Local Strategic Planning Statement sets out priorities and associated actions for the key interrelated areas of infrastructure, liveability, productivity, and sustainability. ‘</p> <p>Liveability is addressed in the LSPS Planning Priority 10 ‘Housing Choice’. This noted that while the <i>South District Plan</i> prioritised Miranda and Sutherland as strategic centres, the Council Housing Strategy would look to smaller centres for opportunities for appropriate, low scale infill housing, which would offer more housing choice around lower order centres.</p> |

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| <p>strategy or strategic plan</p> | <p>Under consideration would be several approaches including enlarging the centres and increasing height and floor space.</p> <p>While the LSPS's Planning Priority 12 'Grow Strategic Centre Jobs' doesn't include Jannali, the planning proposal provides the opportunity for increased retail/business floorspace in Jannali, which will contribute to the growth of the Local Centre.</p> <p>Sutherland Shire Community Strategic Plan 2032</p> <p>The <i>Sutherland Shire Community Strategic Plan 2032</i> identifies the strategic direction and integrated planning framework for the Sutherland LGA. The key strategic outcome that is relevant to the planning proposal includes:</p> <ul style="list-style-type: none"> • <i>A high-quality urban environment, supporting a growing and liveable community.</i> <p>Within the <i>Sutherland Shire Community Strategic Plan</i> is data from public consultation conducted by Sutherland Shire Council. Such data reveals that:</p> <ul style="list-style-type: none"> • 37% of residents agree that they feel able to afford a reasonable standard of housing in the Sutherland Shire. • 65% of residents were satisfied with diversity and choice of housing types. <p>The planning proposal's concept design would provide an additional 44 residential units to support the forecasted growth of the area. Revitalising the site with a contemporary shop top housing development will deliver a new building with enhanced amenities, on-site shared parking, and improved accessibility compared to the existing site. New apartments would cater to a mix of population types with varying incomes. The planning proposal is, in our opinion, consistent with the <i>Sutherland Shire Community Strategic Plan 2032</i>.</p> <p>2020 Sutherland Shire Housing Strategy (to 2031)</p> <p>From 2018, the <i>South District Plan</i> set out a 20-year target for an increase of 83,500 dwellings in the district and 10,100 additional dwellings within Sutherland Shire. Eighty percent of these new dwellings are to be located close to centres. The <i>Sutherland Shire Housing Strategy to 2031</i> aligns with the <i>South District Plan</i> and sets out objectives that ultimately assist in meeting such a target. These objectives relevant to the planning proposal include:</p> <ul style="list-style-type: none"> • <i>To meet the community need for increased housing choice;</i> • <i>To encourage redevelopment to promote the revitalisation of centres; and</i> • <i>To facilitate the use of public transport and the efficient utilisation of existing and future infrastructure.</i> <p>The concept proposal addresses these objectives as the need for increased housing choice is met with an additional 44 residential units containing a variety of 1-bedroom, 2-bedroom and 3-bedroom apartments, which accommodates a range of choices and affordability levels.</p> <p>The planning proposal is contributing to the revitalisation of the Jannali Town Centre as it supports forecasted growth and encouraging increased activity within the area.</p> <p>The site is close to bus stops and the Jannali Train station, encouraging the use of public transport and existing infrastructure, and reducing reliance on cars. The planning proposal is, in our opinion, consistent with the objectives of the <i>Sutherland Shire Housing Strategy 2031</i>.</p> <p>The subject site is within an established residential and commercial area. Although it is approximately 150 meters away from a heritage item located at Jannali Train Station, the site is not identified by Council as having any ecological significance. A site-specific increase in the height and FSR is therefore, very unlikely to have any immediate effect on the natural environment.</p> <p>The area is experiencing a significant increase in the height, bulk and scale of proposed and approved built forms. These cater for growth and contribute to the future character of a desirable and convenient location.</p> <p>Some of the key site-specific reasons to amend the <i>Sutherland LEP 2015</i>, with consideration of the surrounding existing and approved uses, services, and infrastructure, include:</p> <ul style="list-style-type: none"> • Consistent with the <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i>; and the <i>South District Plan</i>; |
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| | <ul style="list-style-type: none"> • Offers a building that is similar in character to other properties in Jannali, such as those nearby on Mitchell Avenue; • Optimises site use for future growth based on a transit-orientated development approach and accentuating prominent locations, including core areas; • Complementary use to the nearby residential uses; • Close to various public transport connections: <ul style="list-style-type: none"> ○ Approximately 70 metres to Box Road bus network. ○ Approximately 150 metres to train and bus services from Jannali Railway Station. ○ Jannali Railway Station provides a service towards the nearby ferry terminal at Cronulla, which provides services to Bundeena. ○ Bus services provide regular access to surrounding areas such as Miranda Westfield and Oyster Bay Shops. ○ Train services provide access to Sydney CBD, and Domestic and International Airports. • Proximity to nearby uses: <ul style="list-style-type: none"> ○ Nearby and neighbouring properties provide retail, business and medical services. ○ Approximately 2km from Woronora Memorial Park. <p>Accordingly, in our opinion, the site-specific planning proposal has merit and can be supported. Additionally, aligning with the <i>South District Plan</i>, Sutherland Shire Council conducted a community consultation study that focused on housing in the future. Within the Sutherland LGA, there is a greater appetite for apartments in centres [source: Sutherland Shire Council, 2021, 'Housing Our Community']. This further demonstrates the planning Proposal has merit and can be supported.</p> |
| Is the planning proposal consistent with any other applicable State and regional studies or strategies? | <p>Yes, the proposal is consistent with the following State and regional studies and strategies, discussed below.</p> <p>Housing 2041: NSW Housing Strategy</p> <p>This is a whole-of-government approach that establishes a 20-year vision for the people of NSW. It sets a long-term strategy for better housing outcomes, focusing on supply, affordability, diversity, and resilience for metropolitan and regional NSW. The key objectives of this plan are:</p> <ul style="list-style-type: none"> • <i>Enhanced partnerships and cross-sector collaboration;</i> • <i>Increased support for those most in need;</i> • <i>More investments in housing that is adaptable to changing needs and environments ;</i> • <i>Improvement alignment of housing with infrastructure and community services for NSW communities;</i> • <i>Additional support for first home buyers; and</i> • <i>Continued support for people in the private rental market.</i> <p>This planning proposal will allow increased investment in Jannali, to provide more well-designed housing in an existing area with infrastructure and community services. It will offer opportunities for first home buyers and potential additional dwellings in the private rental market.</p> <p>State Environment Planning Policy (SEPP) (Housing) 2021</p> <p>Gray Puksand Architects have prepared an indicative concept shop top housing proposal which has been designed with SEPP65 compliance at the forefront. The concept proposal demonstrates a future development application based on the current planning proposal, will provide suitable accommodation that can accommodate smart technology, reduced carbon footprints, and housing which can accommodate diverse households.</p> <p>Future Transport Strategy: Our Vision for Transport in NSW</p> <p>A Strategy priority includes a thriving 15-minute neighbourhood, with tree canopy cover and shade, quality of public spaces, well-designed roads and pathways, and a concentration of activities that bring people onto streets.</p> <p><i>During the COVID-19 pandemic, people interacted more within their neighbourhoods, shopping and socialising locally. Increased localisation of day-to-day life led to the revitalisation of some centres, altering the demand for passenger transport and generating new freight activities to service changed patterns of shopping. This trend resulted in stronger local economies that residents and businesses want to maintain.</i></p> <p>The planning proposal offers the opportunity to increase housing close to the transport hub of Jannali Railway State and revitalise the centre. The proximity to the station (and bus services) reduces reliance on car trips.</p> |

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| <p><i>Is the planning proposal consistent with applicable SEPPs</i></p> | <p>Yes. There are a number of SEPPs that apply to the subject site which relate to matters that would be considered as part of the planning proposal. In our opinion, the planning proposal is consistent with those relevant SEPPs:</p> <ul style="list-style-type: none"> • SEPP (Housing) 2021; • SEPP (Building Sustainability Index: BASIX) 2004; • SEPP (Resilience and Hazards) 2021; and • SEPP (Biodiversity and Conservation) 2021. |
| <p><i>Is the planning proposal consistent with applicable Ministerial Directions (section 9.1 Directions) or key government priority?</i></p> | <p>Yes. The planning proposal is consistent with the applicable Section 9.1 Ministerial Directions.</p> <p>Direction 1.1 Business and Industrial Zones</p> <p>This direction applies when a relevant planning authority prepares a planning proposal that will affect land within an existing or proposed residential zone (including the alteration of any existing residential zone boundary), or any other zone in which significant residential development is permitted or proposed to be permitted. The objectives of this direction are stated below:</p> <p>(a) To encourage a variety and choice of housing types to provide for existing and future housing needs,</p> <p>(b) to make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and</p> <p>(c) to minimise the impact of residential development on the environment and resource lands.</p> <p>The planning proposal is based on existing site boundaries and the medium density use of the site. The planning proposal will allow for future development comprising a mix of one-, two- and three-bedroom apartments to provide for various existing and future housing needs.</p> <p>The subject site is close to public transport, medical, educational, retail, and commercial services that have capacity to accommodate the increase in residents that the planning proposal will generate. Importantly, there are no significant environmental or resource lands nearby the subject site, and no anticipated impacts of the Proposal on these lands.</p> <p>The Proposal will retain the retail/business use of the site whilst augmenting the locally available housing mix by providing new apartments near shops, services, and importantly, Jannali Railway Station. The Proposal is consistent with this direction.</p> <p>Direction 3.4 Integrating Land Use and Transport</p> <p>The direction applies when a relevant planning authority prepares a planning proposal that will create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, business, industrial, village or tourist purposes. The objectives of this direction are stated below:</p> <p>(a) improving access to housing, jobs and services by walking, cycling and public transport, and</p> <p>(b) increasing the choice of available transport and reducing dependence on cars, and</p> <p>(c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and</p> <p>(d) supporting the efficient and viable operation of public transport services, and</p> <p>(e) providing for the efficient movement of freight.</p> <p>Although the zone is unchanged, the Proposal's intensification is consistent with the objectives of Direction 3.4 due to the site's proximity to public transport.</p> <p>The site is within the Jannali Local Centre and close to the Sutherland Centre, the next train station. It is approximately 160m from the Jannali Railway Station, which services both the T4 line (Bondi Junction to Waterfall/Cronulla) and the South Coast Line (Bondi Junction/Central to Bomaderry/Port Kembla). As noted in the Engagement Stakeholder and Community Strategy:</p> <p><i>Jannali train station is one of the busiest stations on the Cronulla line servicing a wide area that takes in Jannali, Oyster Bay, Bonnet Bay, Kareela, north and west Sutherland and parts of the Menai area due to the frequency of services to and from Jannali.</i></p> <p>The frequency of services which stop at Jannali, make the location desirable for commuters, and as a result, increased commuter car parking is required. As a result, the previous State Government planned a multi-deck car park close to the western side of the railway station. This was withdrawn following residents' complaints, and instead a commuter car park was proposed as part of the Woolworths planning proposal.</p> |

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| | <p>The Nos. 967 & 968 bus services provide regular links between Miranda Westfield, Oyster Bay Shops, and other temporary destinations (at time of preparing this report). A bus interchange is on the opposite side of the Railway Station in Jannali Avenue.</p> <p>The site's accessibility to public transport and local retail facilities and services satisfies the objectives of the direction as it reduces car dependency. The Proposal is consistent with this direction.</p> <p>Direction 5.10 Implementation of Regional Plans Under <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i>, The <i>South District Plan</i> was released in March 2018 and applies to the Sutherland Shire LGA. An assessment of the Proposal against the relevant Planning Priorities and Objectives is provided in response Section B. In our opinion, the Proposal is consistent with the direction.</p> <p>Direction 6.1 Approval and Referral Requirements The direction applies when a relevant planning authority prepares a planning proposal. The objective of the direction is 'to ensure that LEP provisions encourage the efficient and appropriate assessment of development'.</p> <p>The planning proposal does not propose any controls that amend concurrence or referral procedures in the LEP. The Proposal is consistent with this direction.</p> <p>Direction 7.1 Implementation of A Plan for Growing Sydney (Greater Sydney Region Plan: A Metropolis of Three Cities, March 2018) <i>A Plan for Growing Sydney</i> was released in December 2014 and applied to the Sydney Metropolitan Area. The plan was intended to guide the delivery of housing, employment, infrastructure, and open space over the next 20 years. That plan did not apply to the Sutherland Shire LGA.</p> <p>The plan was superseded by the <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i> since March 2018, which applies to the Sutherland Shire LGA.</p> <p>A detailed assessment of the proposal against the <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i> is in provided in Section B. In our opinion, the Proposal is consistent with the direction.</p> |
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The above assessment demonstrates that the site's strategic characteristics make it eminently suitable for urban renewal. The technical reports which accompany the planning proposal support the increase in building height and FSR for the site and demonstrate strong evidence for future development. The planning proposal responds positively to the key actions, priorities and objectives of the relevant strategic planning policies.

Site Specific Merit

The planning proposal has site-specific merit for the reasons detailed in the following assessments, as outlined in **Table 2: Site Specific Merit Test**.

| TABLE 2: SITE SPECIFIC MERIT TEST | |
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| Criteria | Planning Proposal Response |
| Section C: Environmental, Social and Economic Impact | |
| <i>Is there any likelihood that critical habitat or threatened species, populations or ecological</i> | No. The subject site is within an established residential area with nearby residential and commercial uses that has been used for these purposes for many years. The site is not identified by Council as having any ecological significance. For these reasons, it is very unlikely that the planning proposal would adversely affect critical habitat, threatened species, populations, ecological communities, or habitats. |

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| <p>communities, or their habitats, will be adversely affected because of the proposal?</p> | |
| <p>Are there any other likely environmental effects of the planning proposal and how are they proposed to be managed?</p> | <p>Traffic and Parking</p> <p>A Traffic Report has been prepared by McLaren Traffic Engineering which form part of this submission.</p> <p>The assessment of the indicative development in lieu of an increased building height and FSR, as well as recommendations to avoid potential issues regarding traffic and parking, are provided. In relation to the overall impact of the planning proposal, the report states the following:</p> <ul style="list-style-type: none"> • The concept plan includes the provision of 135 car parking spaces on the ground floor and over three (3) basement car parking levels, satisfying the controls of Council's DCP and demonstrating that the site can accommodate the parking requirements of an increased scale of development. • Servicing and loading can be catered for at the rear of the site, with access from Leopold Lane. This servicing and loading access arrangement satisfies Council's DCP requirements, nothing that the design can be certified upon detailed design. • When considering the existing uses of the subject site compared the proposed development, the net change in traffic generated by the site is in the order of -11 vehicle trips (-9 in, -2 out) and -14 vehicle trips (-5 in, -9 out) in the AM and PM peak hour periods, respectively. It is evident that the proposed development will act to REDUCE vehicular trips associated with the subject site and therefore, improve the conditions of the surrounding road network. • The traffic generated by the development is minimal when considering the existing traffic volumes in the local area and will not adversely affect the performance of nearby critical intersections or the existing road network, particularly in terms of Level of Service, traffic flow efficiency, residential amenity and road safety considerations. <p><i>In view of the foregoing, the subject planning proposal is supportable in terms of traffic flow, road safety and parking impacts. It is recognised that this assessment has been informed by a concept masterplan for the site and a more detailed assessment would be required when considering the future buildings.</i></p> <p>Heritage</p> <p>The planning proposal is unlikely to have any heritage implications as the subject site is not a heritage item and is not located within a Heritage Conservation Area. The heritage items to the west at Mitchell Avenue are situated 170 to 200 metres from the subject site and their heritage significance is unlikely to be affected.</p> |
| <p>Has the planning proposal adequately addressed any social and economic effects?</p> | <p>The following responses are provided to issues raised in the <i>Local Environmental Plan Making Guideline</i>, in relation to social and economic effects.</p> <p>Effects on items or places of non-Aboriginal or Aboriginal cultural heritage not already addressed elsewhere</p> <p>Response: The site is an urban site, which has been modified and is identified as a Heritage site and is not known to have an association with Aboriginal cultural heritage.</p> <p>Estimate the number of jobs or housing growth (e.g., construction/post-construction and housing diversity)</p> <p>Response: An Economic Analysis was prepared by Macroplan Holdings Pty Ltd which estimated the following benefits in terms of jobs and increased housing diversity created by the proposal (with final figures are subject to confirmation of development application):</p> <p><i>The rezoning (and its subsequent site redevelopment) can support the local economy and complement the existing town centre by providing affordable housing stocks and promoting industry diversification. It will also generate more employment during the planning, construction, and maintenance stages.</i></p> <p><i>In addition, it is our professional opinion that the potential site redevelopment format can deliver about 18 to 22 FTE direct jobs (operational). However, the operational employment outcome is subject to several variables including economic growth trajectory or systematic risk (e.g., recession, policy changes, international conditions). Therefore, the potential FTE direct jobs could be higher or lower than our estimate. However, the employment outcome from the potential site redevelopment configuration will surpass the current land use(s).</i></p> <p><i>Further to this, the additional direct job creation will generate additional 17 to 21 indirect and induced jobs outside the planned residential development on the subject site (i.e., indirect, and induced jobs).</i></p> <p><i>The proponent also indicated that the capital investment value of this project is expected to be approximately \$25 million. Based on this capital investment value, 30 to 40 full-time equivalent jobs per annum directly in the construction industry and a further 50 to 60 full-time equivalent jobs per annum indirectly (for example, jobs in transport, fabrication, planning and design etc).</i></p> |

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| | <p>Response: <i>Identify the impact on existing social infrastructure, such as schools and hospitals</i> The majority of the 44 dwellings are one- and two-bedroom apartments with nine apartments being three-bedroom. Therefore, it is expected most apartments will be occupied by one and two persons. This is not likely to result in a significant change in demand on existing social infrastructure.</p> <p>Response: <i>Identify the need for public open space or impacts on green infrastructure</i> The site being within a Local Centre zone, there is no green infrastructure within the site or in its immediate vicinity. In considering the need for open space, the concept proposal includes a roof top communal open space area for future residents. There are many varied Open Space Recreation & Community Facility opportunities within 800 metres of the site.</p> <p>Response: <i>Identify the impact on existing retail centres</i> Several benefits are associated with the proposal:</p> <ul style="list-style-type: none"> • Increased retail/business space availability – the proposal provides an additional floor area over the existing retail space, in contemporary premises, that addresses all three street frontages. • Additional workers within the enlarged retail/business spaces will contribute to the local economy; • Residents of the proposed 44 apartments will contribute to the local economy, by shopping, frequenting local businesses and availing themselves of local services in the Jannali centre. • The proposed 75 parking spaces include 11 for the retail/business component, which will reduce on-street parking demand by retailers and their customers. • The rear loading dock from Leopold Lane will allow deliveries to the rear of the site, instead of from Box Road. <p>Response: <i>Identify measures to mitigate any adverse social or economic impacts, where necessary, and whether additional studies are required</i> As demonstrated by the concept building design, the planning proposal provides additional retail/business space and new residential accommodation on the site. The social and economic benefits include an increased number of dwellings and high amenity accommodation in a central location.</p> <p>Response: <i>Identify any proposed public benefits</i> The planning proposal will create several positive public benefits including:</p> <ul style="list-style-type: none"> • Revitalising the site and providing a high-quality development in a well-connected location; • Contemporary accommodation which can achieve compliance with current Apartment Design Guide requirements, for greater amenity; • Additional residential accommodation which is close to transport; employment centres; and Sydney's CBD. This meets the objectives and planning priorities of <i>Greater Sydney Region Plan: A Metropolis of Three Cities</i>; • Carefully designed built form to maintain adequate solar access to the public domain and adjoining development; • Additional local expenditure from an increase in future residents correlating with the increased number of apartments; • Additional employment during the construction process both directly and indirectly; • The planning proposal achieves the objectives for the E1 Local Centre Zone and promotes increased development to revitalise the Jannali Town Centre. The subject site is close to well-serviced public transport and retail services; and • The variety of apartments will cater to a range of age groups, households, and demographics. The concept could potentially offer more affordable housing options within the locality for new homeowners, or for down-sizers. <p>Accordingly, in our opinion, the planning proposal addresses the social and economic effects to the public in amending the LEP development standards for Building Height and FSR, to accommodate the concept proposal.</p> |
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| Section D: Infrastructure (Local, State and Commonwealth) | |
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| Is there adequate public infrastructure for the planning proposal? | <p>Yes. The subject site is within an established urban area currently serviced by adequate water, sewer and electricity infrastructure which can be upgraded for future development. The concept proposal has considered the potential road widening of Leopold Lane.</p> <p>As previously discussed, the site is close to a variety of public transport connections including Jannali Train Station to the west and there are bus stops near the site on Box Road, and a bus interchange on Jannali Avenue. These increase the transport sustainability of the Proposal.</p> <p>Additionally with shopping facilities, restaurants, entertainment, and other services at Jannali Town Centre, walkability is increased, and reliance on car travel is decreased.</p> <p>The planning proposal is consistent with the objectives of the Sutherland Shire LEP 2015 E 1 Local Centre zone. The subject site is zoned E1 Local Centre under the LEP, gazetted on 23 June 2015. Shop top housing is permissible with development consent.</p> <p>The LEP Land Use Table contains the objectives for the E1 Local Centre Zone. The relevant objectives and our response are stated, inter alia:</p> <p><i>Objective: To provide a range of retail, business and community uses that serve the needs of people who live in, work in or visit the area.</i> Response: The ground floor and lower ground floor spaces will be suitable for a variety of retail and business uses that will serve local residents, workers, commuters, and visitors to the area.</p> <p><i>Objective: To encourage investment in local commercial development that generates employment opportunities and economic growth.</i> Response: With retail/business services, the site provides employment opportunities during construction and afterwards as retail/business space and residential dwellings. A shop top housing development would increase residential dwellings in the area, and commercial/retail services, therefore providing important opportunities to the people in the area.</p> <p><i>Objective: To enable residential development that contributes to a vibrant and active local centre and is consistent with the Council's strategic planning for residential development in the area.</i> Response: The site is approximately 150 meters of the Jannali train station, therefore in easy walking distance, which encourages active transport for future residents, workers, and customers of a future shop top housing development, anticipated for the site.</p> <p><i>Objective: To encourage business, retail, community and other non-residential land uses on the ground floor of buildings.</i> Response: Retail and business premises are being maintained at street level, while residential dwellings are added above.</p> <p><i>Objective: To create an attractive, vibrant and safe public domain that has both a high standard of urban design and public amenity that is designed to cater for the needs of all ages and abilities.</i> Response: The site will have user-friendly design, effectively enabling access by people of all ages and abilities, maintaining desirable public amenity. A future development proposal would have lifts from basement to penthouse level, for ease of mobility throughout the site. The site is also close to public transport and in easy walking distance of other nearby retail/business developments.</p> <p><i>Objective: To provide a mix of compatible land uses and building forms that act as a transition to the surrounding residential neighbourhood.</i> Response: Future shop-top housing on the site would cater for retail, business, and residential uses, which all complement the surrounding neighbourhood. The concept proposal demonstrates neighbour amenity can be achieved.</p> |
| Section E: State and Commonwealth Interests | |

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| <p><i>What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway Determination</i></p> | <p>From our review, the proposal is not likely to affect any interest of State or Commonwealth authorities.</p> |
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