



Assessment of Planning Proposal Application

Application for a Planning Proposal applying to land at 1 -
17 Grey Street and 32 - 48 Silverwater Road, Silverwater

PP-3/2015

September 2015

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1.0 Introduction

1.1 Executive summary

This report provides an assessment of a Planning Proposal Application ('the proposal') submitted to Council on 23 July 2015 for land at 1 to 17 Grey Street and 32 – 48 Silverwater Road, Silverwater.

The proposal is prepared by APP Corporation Pty Limited on behalf of the applicant Hilfor Project Pty Limited. It seeks to amend the *Auburn Local Environmental Plan 2010 (Auburn LEP 2010)* to:

- Rezone the site from B6 Enterprise Corridor zone to B2 Local Centre zone;
- Increase the Height of Buildings control from 14 metres to a Height of Buildings control of 25 metres with a local provision allowing up to 32 metres;
- Increase the Floor Space Ratio (FSR) from 1:1 to 4:1; and
- Amend the existing minimum lot size of 1,500m² to no minimum lot size.

The proposal includes conceptual drawings of two buildings of 5 and 8 storey mixed use development comprising 4,000m² of ground floor commercial/retail floor space, 250 apartments. The details of the proposal are outlined in section 3.0 and in Appendix 4 of this report.

The rezoning is being sought because residential accommodation and retail premises are not permissible uses within the current B6 Enterprise Corridor zone under the *Auburn LEP 2010*.

The application was publicly exhibited from 4 August to 8 September 2015 (inclusive), in accordance with Council's *Communication Plan for Planning Proposals* as adopted by Council. A total of 13 submissions (including 2 petitions and one agency submission) were received (refer to section 6.0 and Appendices 11-14 of this report).

This report recommends that Council amend the planning proposal application for the rezoning of land at 1-17 Grey Street and 32-48 Silverwater Road, Silverwater (PP-3/2015), as follows, prior to proceeding with it:

- (a) amend the proposed rezoning to B1 Neighbourhood Centre;
- (b) reduce the proposed FSR to a maximum of 2.7:1, as recommended by the feasibility analysis undertaken by the AEC Group on behalf of Council;
- (c) reduce the maximum height of buildings to 20 metres, and require the applicant to undertake urban design analysis to test the impact in terms of building envelope and relationship with surrounding development;
- (d) require the applicant to undertake additional traffic modelling and analysis to assess the potential cumulative impact of the proposal on traffic across the broader traffic network, including Silverwater Road, as recommended by the RMS;
- (e) require the applicant to provide further justification for the reasons for refusal cited in the Department of Planning's Gateway Determination, and justify inconsistency with section 117 Direction 1.1 - Business and Industrial zones (via a study in accordance with the regional, subregional or the Auburn Employment Lands Strategy 2015) for Director General of DP&I's agreement prior to proceeding;
- (f) require the applicant to undertake a Phase 1 contamination assessment of the site (subject land) in accordance with SEPP 55 – Remediation of Land to investigate possible site contamination, and suitability of the site for residential uses.
- (g) require the applicant to undertake further discussions with Council regarding the most appropriate LEP mechanism by which to achieve the 4,000 sqm retail component (comprising a 2,500 sqm supermarket and 1,500 sqm of local specialty

retail/commercial floor space), and the need for a site specific development control plan.

Notwithstanding this, this report also raises the following:

- the proposal does not satisfactorily address the reasons for refusal in the Gateway Determination for the previous, almost identical, proposal;
- inconsistencies with relevant state and local plans and strategies;
- the suitability of a B2 Local Centre zone in this location;
- the potential to result in a cumulative loss of surrounding employment lands;
- the proposal does not adequately consider the traffic impacts, particularly cumulative traffic impacts on the surrounding network; nor the impacts on other retail areas;
- the proposal has not demonstrated that this contaminated site can be made suitable for residential development.

An assessment of the application can be found at sections 4.0 and 5.0 of this report.

1.2 Purpose of this assessment report

The purpose of this report is to assess the merits of the proposal applying to land at 1 - 17 Grey Street and 32 - 48 Silverwater Road in accordance with local and state government legislation and policies.

This report is not a planning proposal. A formal planning proposal, to be submitted to the Department of Planning and Environment, will be prepared if the application for a planning proposal is supported by Council.

1.3 History

An application for a planning proposal was lodged with Council in 2013, and Council resolved to prepare and forward a planning proposal with a number of changes to the Department of Planning and Environment in 2014. The proposal was refused at Gateway (see Appendix1). The reasons given in the Gateway Determination for refusal related to:

- The potential of the proposal to create significant land use conflict within the area to reduce land considered to be strategically and regionally important employment land;
- The potential of the proposal to undermine the role of the B6 Enterprise Corridor zone in Auburn City;
- Locating residential development in an area that is not focused around a local centre or a corridor that permits residential uses and has good access to public transport;
- Inconsistency with the West Central Draft Subregional Strategy, Auburn Employment Lands Strategy (2008) and S117 Direction 1.1 Business and Industrial Zone.

The current proposal is almost identical to the proposal refused at Gateway.

1.4 Applicant liaison with Council

A meeting was held on 30 June 2015 between council staff, the site owner and their consultant to discuss requirements for the lodgement of the current proposal.

Following exhibition of the proposal council staff met with the applicant and consultant in September 2015, to discuss the progress of the proposal.

Council staff provided the applicant with summaries of the submissions (on 15 September 2015) and with AEC Group's feasibility analysis (on 23 September 2015), as requested at the September meeting. The applicant has provided comments in response.

2.0 Existing Situation

2.1 Description of the subject site and surrounds

The land subject to this Planning Proposal application ('the subject site'), shown yellow in Figure 1, is located at 1-17 Grey Street and 32 - 48 Silverwater Road, Silverwater within the Auburn Local Government Area (LGA).

The subject site is located on Silverwater Road and is located approximately 300 metres north from the M4 motorway interchange, and approximately 530 metres north of Parramatta Road. Carnarvon Street is the nearest cross street.

Figure 1 shows the subject site is located approximately 1.5km north east of the Auburn Town Centre as the crow flies, 2.6km north of Lidcombe Town Centre and 2.3km west of Sydney Olympic Park Specialised Centre railway stations (shown in light blue). Walking distance to the closest station is 1.9 kilometres to Auburn.

The subject site is located approximately 0.5km east from the Silverwater Neighbourhood Centre (outlined in orange) and 1.1km north east from Newington Village Centre (outlined pink).

The subject site comprises 17 properties, of which the applicant owns 14 properties. The land ownership details of the subject site are discussed in section 2.2 of this report.

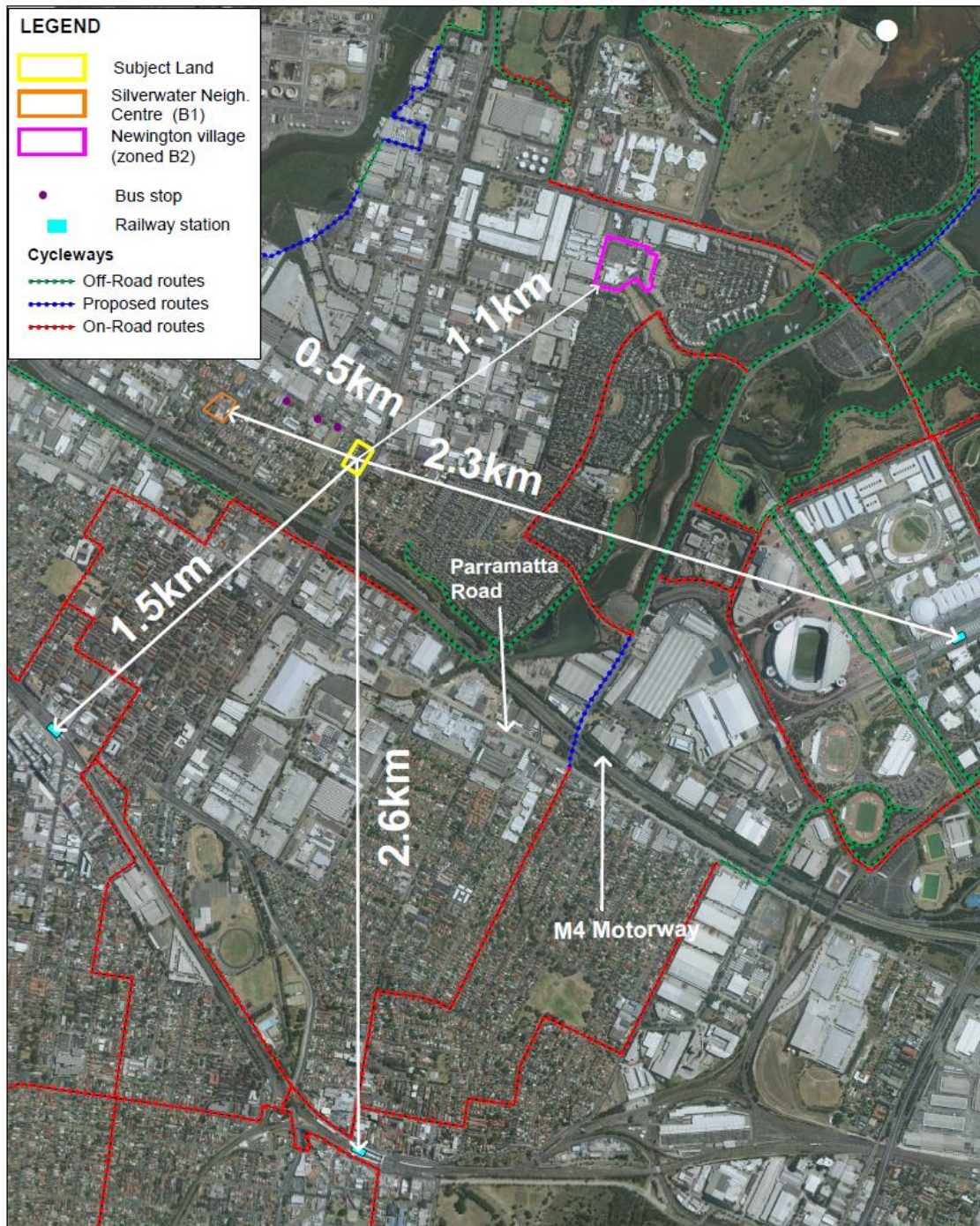


Figure 1 – Aerial view showing the subject site and its proximity to other existing local centres

Figure 1 also shows the existing nearest bus stops and cycleway routes surrounding the subject site. Figure 2 overleaf shows the subject site outlined in yellow with its immediate surrounds.

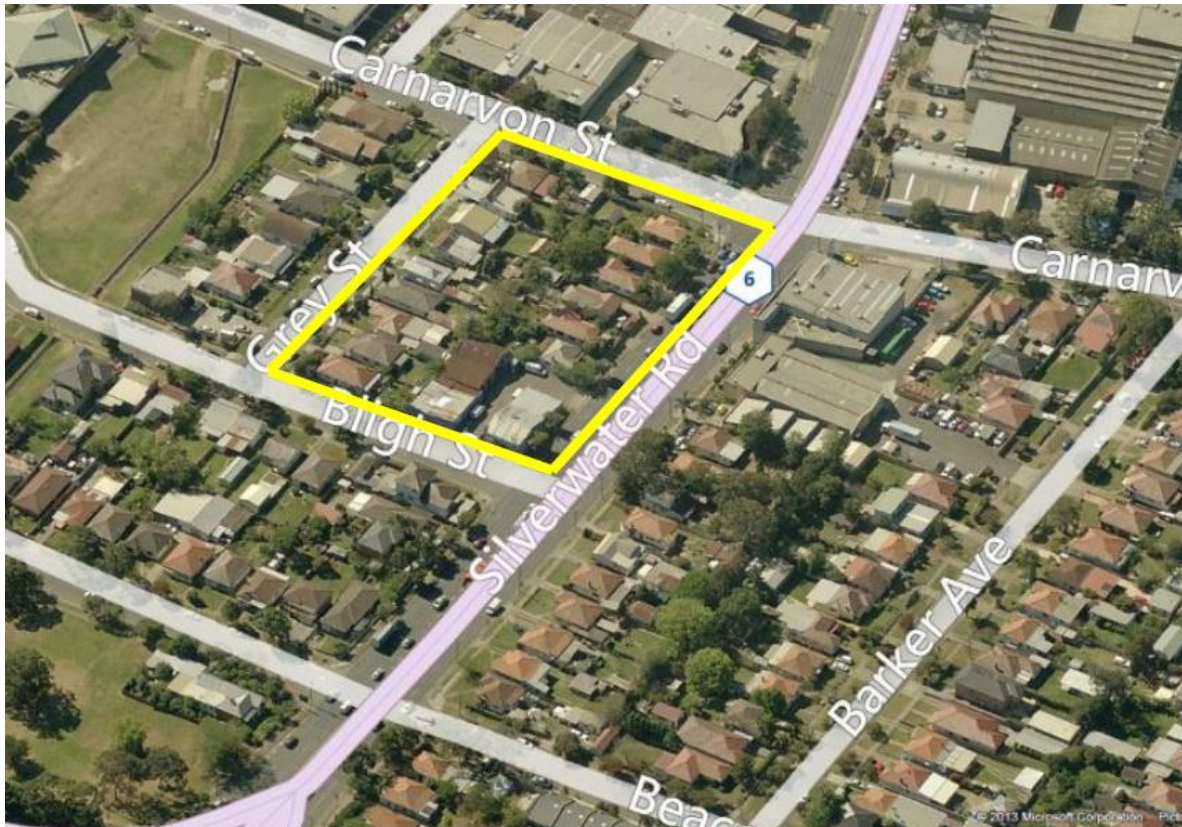


Figure 2 – The subject site and its surrounds
(Source: Bing Maps, August 2013)

The subject site has the following characteristics:

- it includes 17 allotments covering a site area of approximately 7,500m² (0.75 hectares);
- is bound by Bligh Street to the south, Grey Street to the west, Carnarvon Street to the north and Silverwater Road to the east;
- a site frontage of approximately 108.5 metres to both Silverwater Road and Grey Street, and a site frontage of approximately 69 metres to both Bligh and Carnarvon Streets;
- an existing subdivision pattern of medium to large sized residential lots;
- it fronts Silverwater Road, which forms part of a key north-south route within metropolitan Sydney. Silverwater Road carries approximately 57,701 vehicles per day between Parramatta Road and the M4 motorway ramps (Traffic Volume data for the Sydney Region 2005, RTA 2005) and has an Annual Average Daily Traffic (AADT) volume of approximately 40,000 vehicles (as confirmed by RTA, map 15);
- is located approximately 200 metres and 160 metres from Council's Hume and Deakin Parks respectively; and
- the majority of the subject site is occupied by single storey detached fibro dwellings, a mixed business/cafe, and a dry cleaning facility (no longer operational).

Photos of the site and its surrounds can be found at Appendix 2. A summary of existing land use and zoning is included in Appendix 3.

The area surrounding the site has the following characteristics:

- The land south of Bligh Street and land west of Grey Street is currently occupied by existing single storey detached dwellings.
- Land located north of Carnarvon Street is occupied by large floor plate two storey heavy industrial and warehouse developments located within the Silverwater Industrial Precinct. This is part of Auburn's premier industrial estate (AEC, 2015);
- The buildings located opposite the subject site along the eastern edge of Silverwater Road currently include single storey detached brick and fibro dwellings and two storey industrial buildings (refer Appendix 2); and
- Parramatta Road is located approximately 530 metres south of the subject site. This precinct generally consists of a mix of 2-3 storey industrial, warehouses, business and bulky goods developments, with a number of 4 to 6 storey commercial buildings.

2.2 Land ownership of the subject site

The properties at 1, 3, 5, 7, 9, 11, 13 Grey Street and 32-34, 38, 40, 42, 44 and 46 Silverwater Road Silverwater are in single ownership.

The properties at 15 and 17 Grey Street and 48 Silverwater Road are owned by others. Whilst this may have implications for the applicant's ability to realise the envisaged development, it is noted, that this is a matter for consideration only at the DA stage.

2.3 Auburn LEP 2010 controls

2.3.1 Auburn LEP 2010 zoning

As shown in Figure 3, the subject site is currently zoned B6 Enterprise Corridor under *Auburn LEP 2010*.

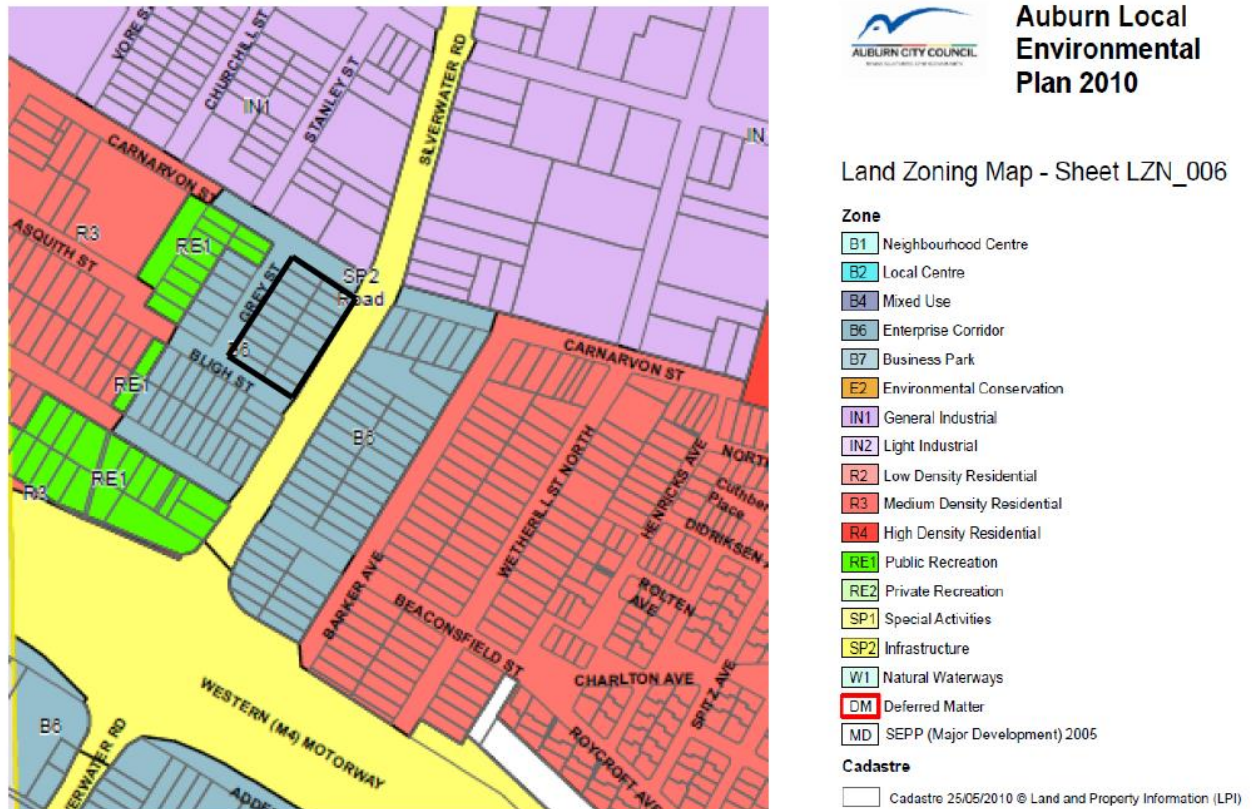


Figure 3 - Auburn LEP 2010 – Extract from Land Zoning Map (site outlined in Black)

The B6 Enterprise Corridor zone objectives are:

- “to promote businesses along main roads and to encourage a mix of compatible uses;
- to provide a range of employment uses (including business, office, retail and light industrial uses); and
- to maintain the economic strength of centres by limiting retailing activity.”

The land uses permissible within the zone include:

“Building identification sign; Business identification signs; Business premises; Bulky goods premises; Community facilities; Food and drink premises; Garden centres; Hardware and building supplies; Hotel or motel accommodation; Kiosks; Landscaping material supplies; Light industries; Markets; Neighbourhood shops; Passenger transport facilities; Plant nurseries; Roads; Timber yards; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not specified in item 2 or 4”.

In general, the B6 Enterprise Corridor zone permits a range of industrial, office and business and non-industrial uses such as community facilities and hotel and motel accommodation. Only limited retail uses are permitted. Residential accommodation is prohibited.

Figure 3 shows that the land surrounding the site is currently zoned IN1 General Industrial to the north, B6 Enterprise Corridor and RE1 Public Recreation to the west and south, and SP2 Infrastructure (Roads) and B6 Enterprise Corridor to the east. The land located further afield to the west and east of the subject site is currently zoned R3 Medium Density Residential.

2.3.2 Auburn LEP 2010 principal development standards

Table 1 below summarises the *Auburn LEP 2010* principal development standards that currently apply to the subject site:

Auburn LEP 2010 land zoning	Maximum Building Height	Floor Space Ratio (FSR)	Minimum Lot Size
B6 Enterprise Corridor zone	14 metres	1:1 Also affected by <i>Auburn LEP 2010</i> clause 4.4(2C) which provides FSR incentives for specific uses (see following page to details).	1500 m ²

Table 1 - Summary of existing *Auburn LEP 2010* controls applying to the subject site

Figure 4 below is an extract from the *Auburn LEP 2010* Building Height map which shows that Clause 4.3 (2A)(b) applies to the subject site.

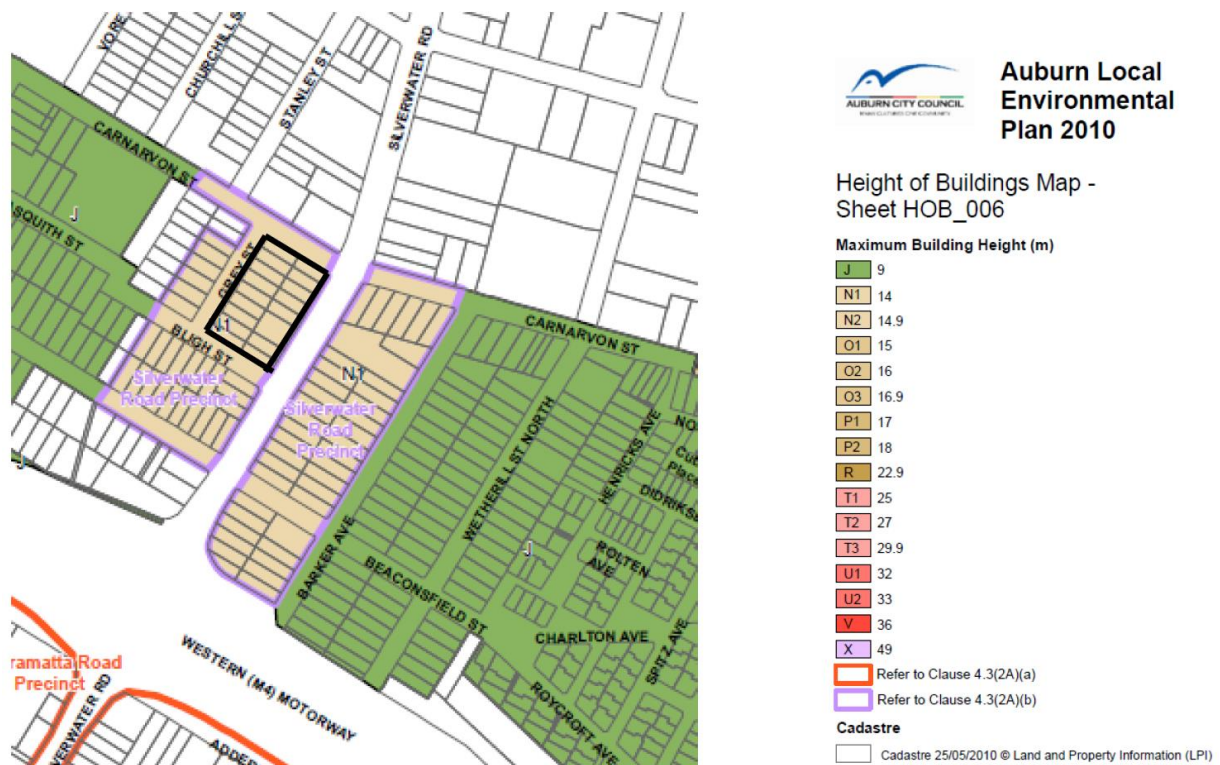


Figure 4 – Auburn LEP 2010 - Extract from Height of Buildings Map (Site outlined in black)

This clause provides a specific Height of Buildings requirement of 14 metres for the Silverwater Road Precinct (ie the land zoned B6 Enterprise Corridor, located on either side of Silverwater Road between the M4 and Carnarvon Street).

Figure 5 below shows an extract from the *Auburn LEP 2010* FSR map and the area to which Clause 4.4(2C) applies, including the subject site.

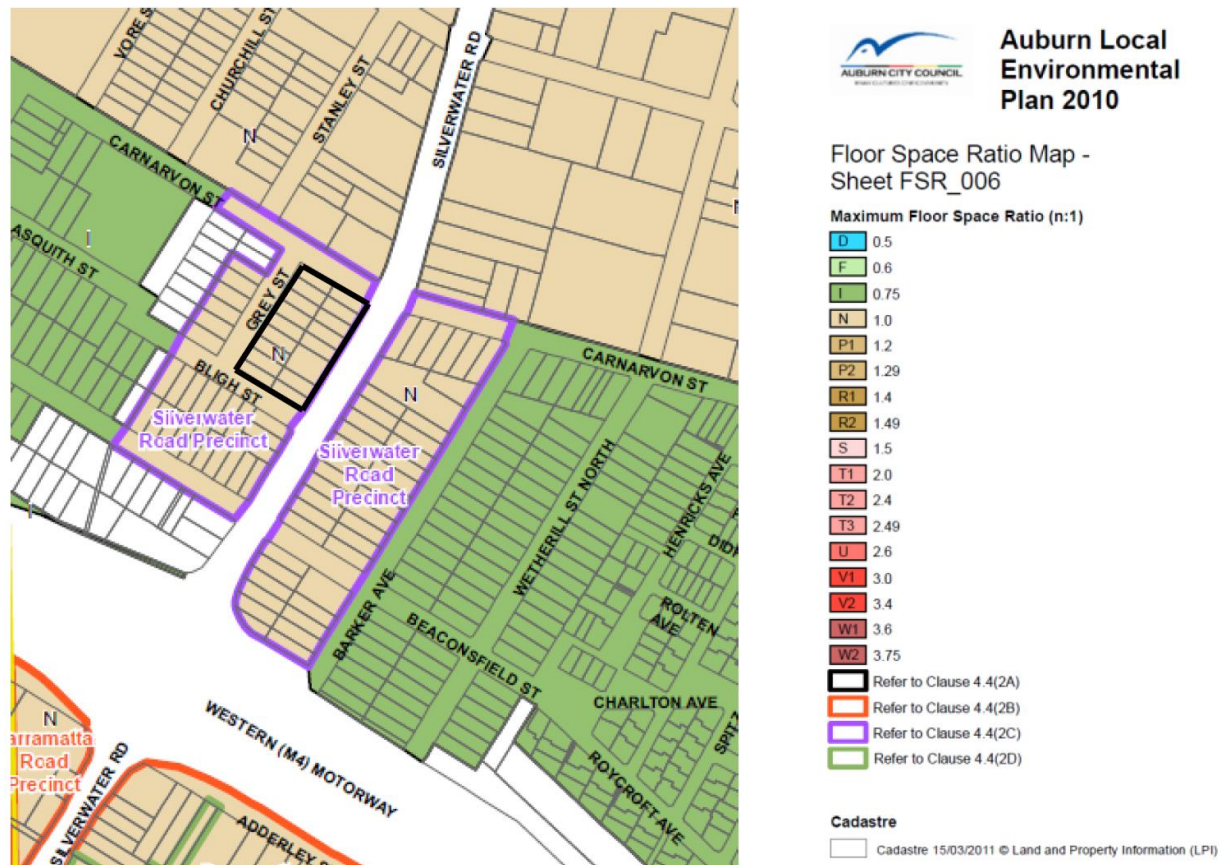


Figure 5 – Auburn LEP 2010 – Extract from Maximum Floor Space Ratio Map (site out lined in black)

This clause provides Floor Space Ratio incentives for specific uses within the Silverwater Road Precinct and clause states:

“Despite subclause (2), the maximum floor space ratio for the following development on land in zone B6 Enterprise Corridor within the Silverwater Road, Precinct, as shown edged light purple on the Floor Space Ratio map, is as follows:

- (a) 1.5:1 for bulky goods premises, entertainment facilities, function centres and registered clubs, and*
- (b) 2:1 for office premises and hotel and motel accommodation”.*

2.3.3 Minimum Lot Size

Currently a minimum subdivision lot size of 1,500m² applies to the subject site (see Figure 6 overleaf).

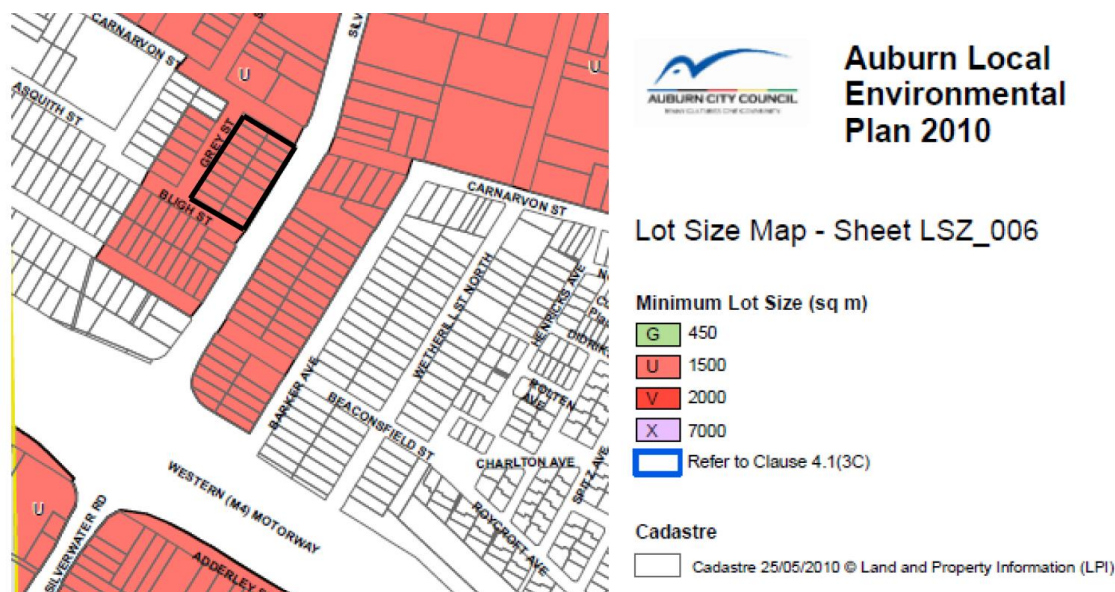


Figure 6 – Auburn LEP 2010 – Extract from Lot Size Map (site outlined in black)

2.3.4 Acid Sulphate Soils

The subject site is shown as having Class 5 Acid Sulphate Soils under the *Auburn LEP 2010* Acid Sulphate Soils Map, which is the least affected category for development purposes.

2.4 Previous zoning

The subject site was previously zoned 2(b) Residential Medium Density zone under the now repealed *Auburn LEP 2000*. The subject site and surrounds were recommended to be rezoned to B6 Enterprise Corridor zone by Hill PDA's *Auburn Employment Lands Study 2008* (*Auburn ELS 2008*). This rezoning recommendation was implemented via *Auburn LEP 2010*.

2.5 Auburn DCP 2010 controls

The most relevant objectives, performance criteria and development controls currently applying to the subject site under the Industrial Areas DCP Part of the Auburn Development Control Plan 2010 (Auburn DCP 2010) are summarised in Table 2 below.

Auburn DCP 2010 Part	Relevant DCP Objectives	Performance Criteria	Development Controls
Industrial Areas DCP Part	<p>"A. To ensure that the form, scale, design and nature of development maintains and enhances the streetscape and visual quality of industrial areas;</p> <p>B. To ensure that the scale of any new industrial development is compatible with surrounding industrial buildings; and</p> <p>C. To ensure the intensity of development recognises the environmental constraints of the site and its locality."</p>	<p>P1 The built form of proposed development is consistent with the existing character of the locality</p>	<p>D3 Number of Storeys – B6 Enterprise Corridor</p> <p>Development for hotel and motel accommodation and office premises on land zoned B6 Enterprise Corridor on Silverwater Road shall be maximum of three (3) storeys.</p>

Table 2 - Summary of the relevant objectives, performance criteria and controls from ADCP (Industrial Areas Part)

3.0 Description of the Planning Proposal

3.1 Proposed changes to controls

The existing controls applying to the subject site, together with the proposed controls are summarised in Table 3 below.

Planning controls under Auburn LEP 2010	Existing planning controls	Proposed planning controls
Land Zoning	B6 Enterprise Corridor zone	B2 Local Centre zone
Key permitted land uses	Include: bulky goods premises, business premises, community facilities, food and drink premises, hotel or motel accommodation, light industries, neighbourhood shops, office premises warehouse or distribution centres.	Include: retail premises, residential flat buildings, shop top housing, business and office premises, child care centres, educational establishments, entertainment facilities.
Height of Building	14 metres The subject site is affected by clause 4.3 (2A)(b) Auburn LEP 2010 which is discussed in section 2.3.2.	25 metres (however see Key Sites control below)
Floor Space Ratio	1:1 The subject site is also affected by clause 4.4(2C) Auburn LEP 2010 which is discussed in section 2.3.2.	4:1
Minimum Lot Size	1,500 m ²	N/A. Council does not typically apply a minimum lot size in the B2 Local Centre zone.
Key Sites	Not currently a key site	The lots identified as a 'key site' with an accompanying local provision permitting up to 32m in height (see below)

Table 3 – Comparison of existing and proposed LEP controls

The proposed local provision associated with the Key Sites Map reads as follows:

6x Development in the Silverwater Road Commercial Precinct

- (1) This clause applies to the land known as the Silverwater Road Precinct, as shown edged dark blue and marked "Silverwater Road Commercial Precinct" on the Key Sites Map.*
- (2) Despite any other provisions within this plan development consent may only be granted to development of the Silverwater Road Commercial Precinct where the*

consent authority is satisfied that a minimum of 2,500 square metres of gross floor area will be available for the purpose of retail/commercial premises on the land.

(3) Despite Clause 4.3 consent may be granted to a building with a building height up to but not exceeding 32 metres, where the consent authority is satisfied that the development reflects design merit.

Table 3a provides a comparison between:

- the controls proposed as part of the current application;
- the controls proposed in the original planning proposal application (June 2013); and
- the planning proposal that was submitted to Gateway in line with Council's resolution of December 2013, which was subsequently refused at Gateway.

Planning controls under <i>Auburn LEP 2010</i>	Existing planning controls	Original planning proposal application (June 2013)	Planning Proposal submitted to Gateway (refused)	Proposed planning controls (current application July 2015)
Zoning	B6 Enterprise Corridor zone	B4 Mixed use Zone	B2 Local Centre zone	B2 Local Centre zone
Maximum Height of Building	14 metres The subject site is affected by clause 4.3 (2A)(b) <i>Auburn LEP 2010</i> which is discussed.	16.9 – 32 metres	25 metres (with key sites control - see below)	25 metres (However see Key Sites control below)
Floor Space Ratio	1:1 The subject site is also affected by clause 4.4(2C) <i>Auburn LEP 2010</i> which is discussed.	3.75:1	4:1	4:1
Minimum Lot Size	1,500 m ²	N/A. Council does not typically apply a minimum lot size in the B2 Local Centre zone.	N/A. Council does not typically apply a minimum lot size in the B2 Local Centre zone.	N/A. Council does not typically apply a minimum lot size in the B2 Local Centre zone.
Key Sites	Not currently a key site	N/A	The lots identified as a 'key site' (ie subject land) have an accompanying local provision requiring the provision of 'a minimum of 2,500m ² of gross floor area be available for the purpose of shops under a single tenancy on the land'.	The lots are identified as a 'key site' (ie subject land) with an accompanying additional local provision <i>permitting up to 32m in height</i> , and including 2500m ² - 4,000m ² of retail/commercial floor space at the street level.

Table 3a – Comparison of Proposed Planning Controls

3.2 Possible development scenario

The application includes an indicative development concept that could occur on the subject site under the proposed controls. The supporting documentation includes a conceptual master plan, a site layout plan, street elevations, shadow diagrams and perspective (indicative) street views of a proposed five to ten storey mixed use development.

The indicative development concept proposes 2 buildings, one with two towers to 8 storeys and one to 5 storeys. 4,000m² retail/commercial floor space at street level (plus a two level basement car park) is proposed with 250 apartments, mostly above the commercial podium, with a total proposed total gross floor area of GFA of 23,539 m². The indicative development concept is provided in Figures 7 to 11.

A copy of the Applicant's Planning Proposal Application is attached as Appendix 4 of this report.

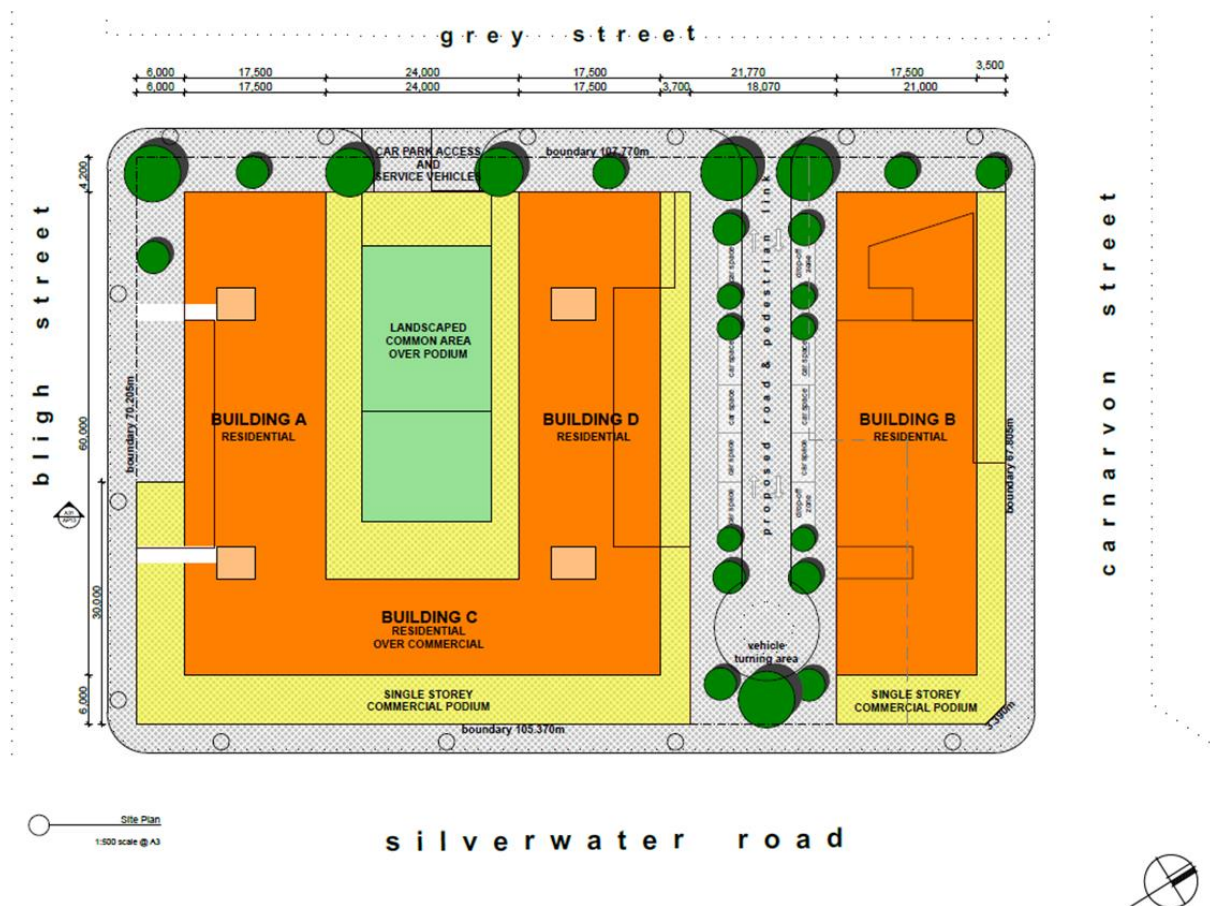


Figure 7 – Indicative Concept layout of the proposed mix use development from Silverwater Road

The Applicant's proposed cul de sac road and pedestrian link shown in Figure 7 would provide access from Grey Street to Silverwater Road for pedestrians, and vehicular entry access to the commercial/retail floors of the indicative mix use development.

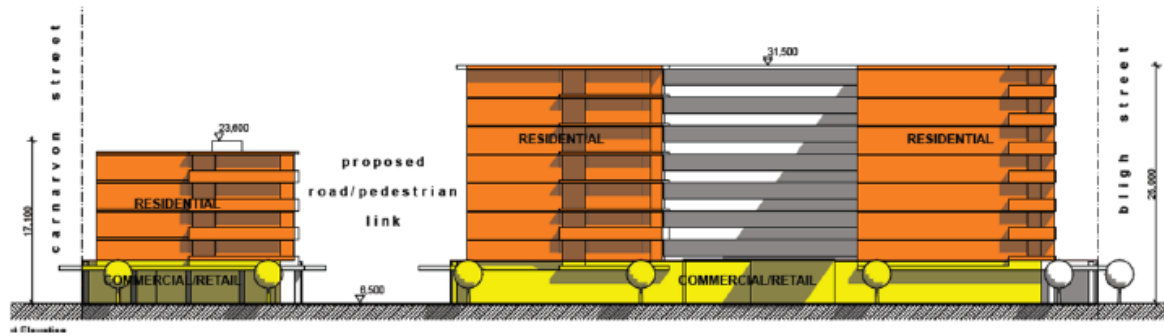


Figure 8 – Indicative Grey St elevation

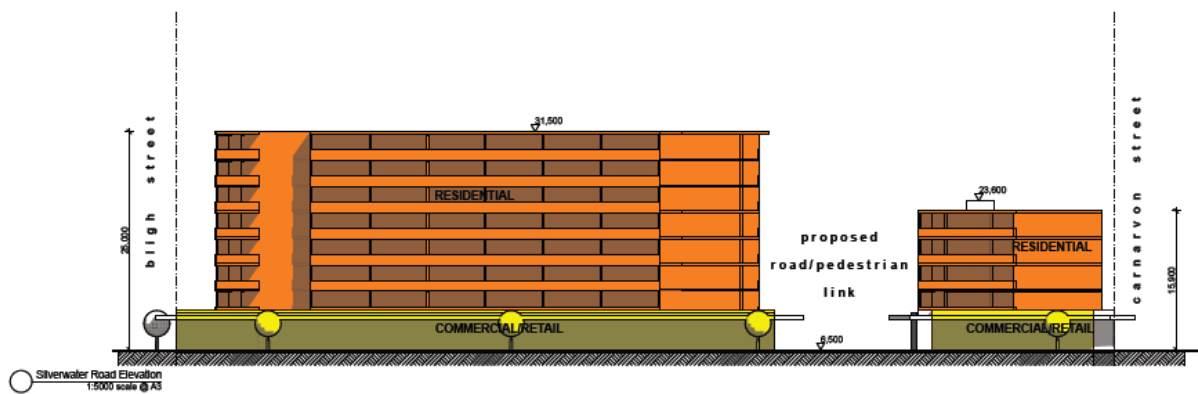


Figure 9 - Indicative Silverwater Rd elevation

Figure 10 - Indicative ground floor layout

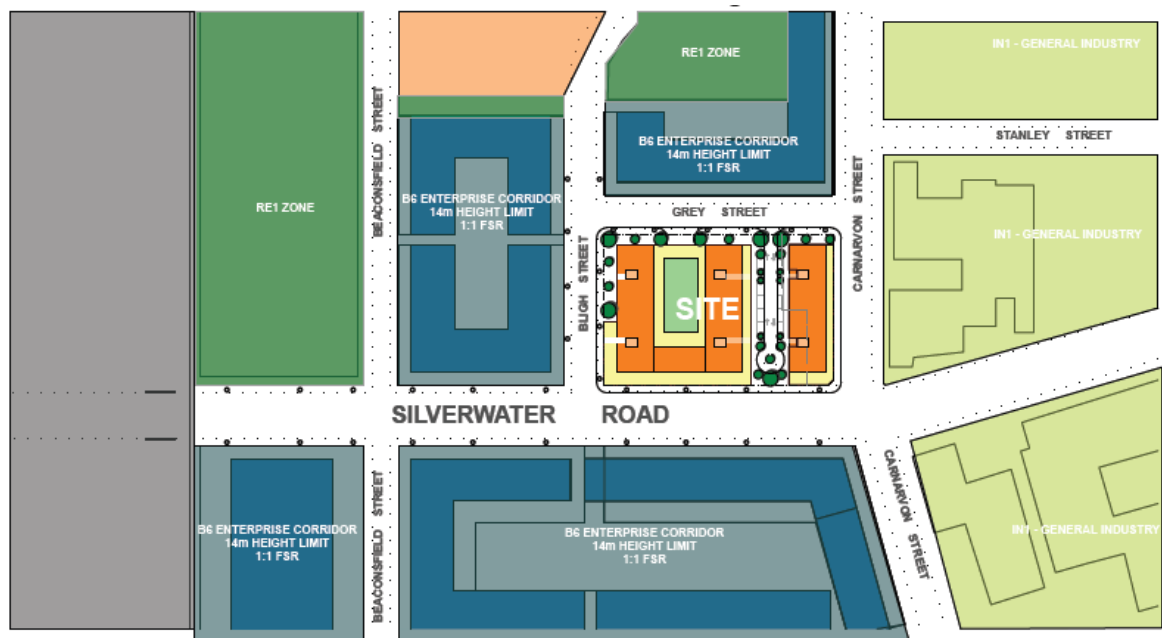
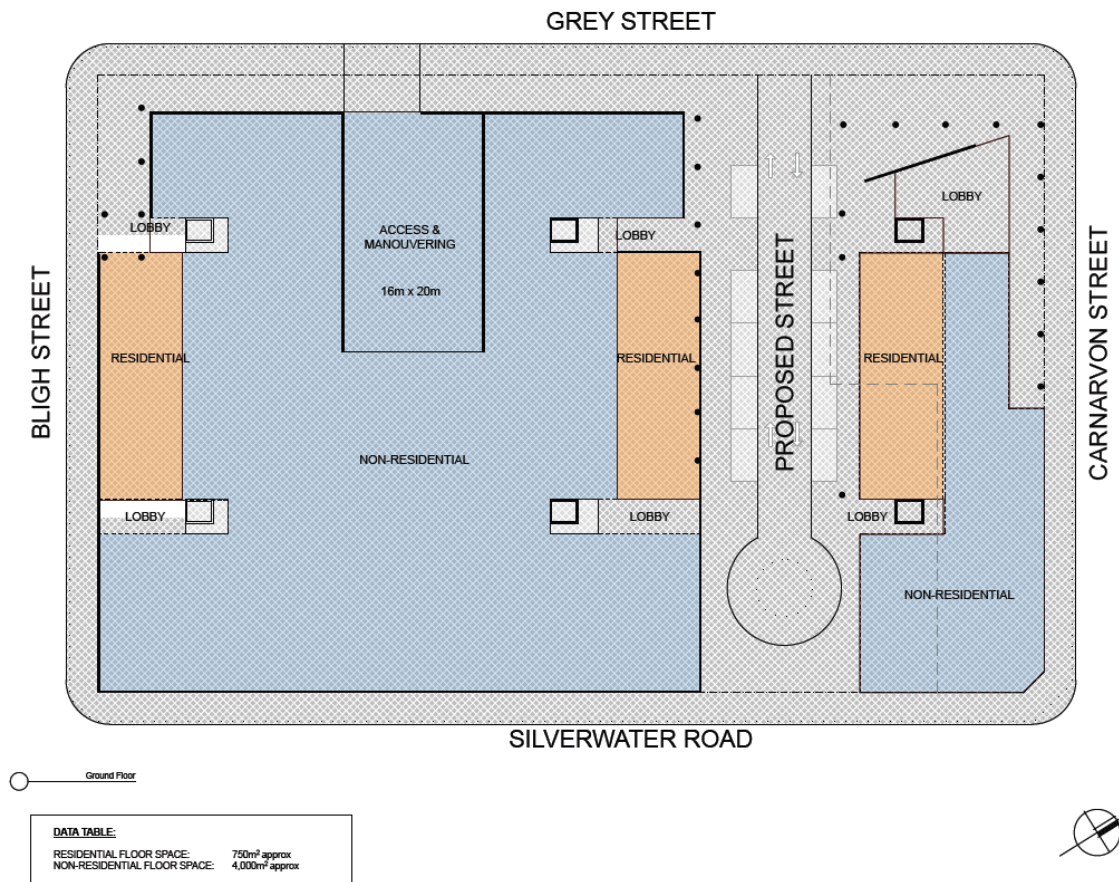


Figure 11 - Concept master plan showing the subject site and its surrounds

It is noted that the plans and illustrations provided by the applicant are ***indicative only***, and they illustrate the type and scale of development that *could* be achieved if the proposed rezoning proceeded.

Note that the concept plan shows development up to 31.5m, relying on design merit under the proposed local provision. Issues of design merit would need to be assessed at DA stage, should the planning proposal proceed to that point.

3.2 Supporting Studies prepared by the Applicant

The planning proposal application is supported by the following studies, undertaken on behalf of the applicant:

- Phase 1 and 2 Environmental Site Investigation (2012) prepared by WSP
- Transport Report (May 2014) prepared by Colston Budd Hunt and Kafes Pty Ltd; and
- Consolidated Economic Reports (May 2014) prepared by Hill PDA

These studies are briefly summarised below.

3.2.1 Phase 1 and 2 Environmental Site Investigation (WSP, November 2012)

This study investigated the nature and extent of contamination in soil and groundwater at the site and determined its suitability for ongoing commercial land use.

WSP states that the site is suitable for ongoing commercial/industrial land use with the following additional works:

- Delineate the extent of chlorinated solvent and hydrocarbon contamination in groundwater down gradient and in the vicinity of MW03 (one of the boreholes).

3.2.2 Transport Report (Colston Budd Hunt and Kafes Pty Ltd, May 2014)

This transport study was prepared on behalf of the applicant to assess the transport implications of the proposed rezoning from B6 to B4 on the subject site and surrounds.

This study states that:

- The envisaged development is accessible by existing and planned public transport services and to local cycleways;
- The access, servicing and internal layout of the indicative concept are considered appropriate;
- The Level of Service (LoS) provided by the subject site at the signalised intersection of Silverwater Road and Carnarvon Street currently and after the proposed mixed use development is likely to be LoS 'D' which is considered to be operating near capacity and
- The intersections with Grey St would operate at LoS A/B which is a "good/acceptable" level of service;
- The additional traffic turning from Bligh St into Silverwater Rd would not have significant implications on its operation.
- The road network will be able to cater for the additional traffic from the proposed development.

An assessment of this study is provided in section 4.3.1 of this report.

3.3.3 Consolidated Economic Reports (May 2014) prepared by Hill PDA

The planning proposal is also underpinned by the Hill PDA Consolidated Economic Report (CER) (May 2014) which includes a Residential Market Appraisal (RMA) (June 2015). The CER found that:

- Hill PDA found was a greater quantum of retail demand than the previous Leyshon study;
- The extent of demand was sufficient to support the proposed development comprising residential GFA of 19,539m² and 4,000m² non-residential/retail floor space;
- A 3,000m² supermarket would reflect the commercial requirements of operators and that both direct and indirect jobs would be generated including an additional 189 full and part-time jobs annually once the retail facilities commenced operations;
- Based on a construction cost of \$50million, 143 jobs would be provided during construction;
- Three centres would have an immediate moderate decline in trade at 2016, but this would reduce over time;
- Two centres would decline in trade comparative to their estimated 2012 levels if the supermarket were 1500m² with 2,500m² of specialty stores;
- A further section of the report recommends a supermarket of 2,000m² to 2600m². The residential development on the site would account for around 10% of the retail turnover on the site;
- The proposed development would cater to the existing demand for apartments in Auburn LGA;
- A net community benefit would be provided by the proposed development.

4.0 Assessment of the Planning Proposal

The planning proposal application has been assessed against the Department of Planning and Infrastructure's document 'A Guide to Preparing Planning Proposals' (the Guide) and "Guidelines on Local Plan Making". The following sections address:

- *The need for the planning proposal*
- *Consistency with the state planning framework*
- *Consistency with local strategies and plans*
- *Environmental, social and economic considerations*
- *Commonwealth and state interests*

As an almost identical planning proposal was refused at Gateway, Section 5.0 of this report also contains an assessment of the current planning proposal application against the reasons for refusal provided in the Gateway Determination.

4.1 Need for the planning proposal

The principal reasons given by the applicant are summarised below, with a brief assessment response provided for each.

That the rezoning is required as the quantum of B6 Enterprise Corridor land is not required as evidenced by the lack of change in the Silverwater Rd precinct (known as Precinct 14) since the rezoning in 2010.

The current *Auburn LEP 2010* will facilitate growth within the Parramatta Road and Silverwater Road B6 Enterprise Corridors. This is evidenced by recent applications/approvals in the B6 zone including DA-439/2011 for construction of a 6 storey commercial building at 11-13 Silverwater Road, Silverwater and DA-24/2013 for construction of 8 storey hotel development at 190-192 Parramatta Road, Auburn.

Additionally, the approval of DA-130/2012 at 79-83 Beaconsfield Street, Silverwater for the construction of a 4 storey mixed use building including 23 commercial/retail units and 118 apartments further indicates that the current planning controls are facilitating growth and revitalisation within the locality.

It is acknowledged that these developments are not within Precinct 14. Nevertheless, the need to retain surplus employment lands was strongly recommended by the *Auburn Employment Lands Strategy 2015* to enable the market to respond to changing demand and market cycles. The work undertaken by AEC Group for the *Draft Parramatta Rd Urban Transformation Strategy* shows that there will be significant demand for land suitable and zoned for employment in Auburn along major roads to cater for displaced industries, bulky goods and urban services (eg car repairs) as the areas along the Parramatta Rd corridor, particularly in the eastern section, increasingly focus on residential development.

That the rezoning would contribute to housing affordability

It is agreed that the provision of additional housing in this location will make a small positive contribution towards housing affordability. However, the proposal does not provide housing

that would be 'affordable' under more formal definitions, that are based on percentage of income of low – moderate income earners.

That the proposal responds to the site context to provide integrated employment and housing opportunities that does not compete with existing retail facilities within an existing urban context accessible to public transport, pedestrian and cycle routes and road networks.

The proposal contains a number of inaccuracies, missing elements and inconsistencies in its consideration of the context of the site. For instance:

- It incorrectly states that residential flat buildings are permitted in surrounding R3 Medium Density lands;
- It does not consider the potential economic impact on the recently completed retail area at 79-83 Beaconsfield Rd (although its existence is acknowledged by Hill PDA in its most recent supporting study). These premises are located within a B1 Neighbourhood Centre zone in the middle of the R3 zoned land, and provides for 27 commercial/retail tenancies.
- Accessibility to public transport and road networks is also contested. These report notes there are concerns about the potential cumulative impact of this proposal on key intersections and on the function of Silverwater Rd itself. There is a single bus route (which later splits in two directions, accounting for the two route numbers listed), which, even at peak times, does not actually run to the frequency stated in the proposal. Further, it is 1.9km to the nearest rail station (Auburn). The application itself states (p. 38)

'A location such as the subject site, without access to significant public transport, and on a major road carrying large volumes of industrial traffic is always likely to be less preferable to other better located sites as far as the accommodation industry is concerned.'

- The application states that the rezoning would deliver public benefit in the form of a publicly accessible through site link with the potential for active uses fronting onto it. The public benefits associated with this particular design aspect have not been demonstrated.
- The application does not provide justification for a B2 Local Centre zone rather than a B1 Neighbourhood Centre. This issue should be addressed, given that the *Auburn ELS 2015* recommended that a new centre with a B1 Neighbourhood centre zoning could be considered.

These matters will be further addressed in this report.

While the *Auburn Employment Lands Strategy 2015 (ELS)* considers there would be benefit to a small retail facility to support the business and industrial lands, the application does not address this matter. The *Auburn ELS 2015* recommends a B1 Neighbourhood Centre within Precinct 14. It does not specify this site. While a planning proposal would be required to achieve this, the *Auburn ELS 2015* recommends that this be done after a master planning exercise for the wider area.

4.2 Consistency with state planning framework

4.2.1 *Plan for Growing Sydney*

The *Plan for Growing Sydney* outlines four goals to achieve the State government's vision for Sydney as a global city and a great place to live. The goals relate to a competitive economy, housing choice, strong healthy and well-connected communities and a sustainable and resilient city that protects the natural environment. Each goal has a number of Directions and Actions to assist in achieving the goals.

The application states that the site is within the Greater Parramatta to Olympic Park Peninsula Growth Area, Action 1.3.3 proposes to identify medium and long term opportunities for urban renewal. The site is not within the corridor. Further, the investigations required, while underway for the Camellia precinct, have not started for the Silverwater area. Employment lands are also critical for urban renewal, as recognised in other parts of the Plan.

Direction 1.9 Support priority economic sectors

This direction seeks to support the growth of priority industries, including manufacturing, ICT and creative industries, by planning for their land use needs. Auburn is identified as having substantial industrial lands. The lands directly to the north of the subject site are part of Auburn's premier industrial estate, described as regionally significant in Auburn's *Employment Lands Strategy 2015*. The location of high density residential development directly adjacent to this land has the potential to constrain the industrial uses, and may set a precedent for the loss of employment lands in this area.

This is inconsistent with the direction.

Direction 2.1 Accelerate housing supply across Sydney and

Direction 2.2 Accelerate urban renewal across Sydney – providing homes closer to jobs

The proposal would accelerate housing supply, close to jobs in the new centre. However, it also has the potential to negatively impact on nearby jobs in the industrial estate, and prevent the take up of B6 lands for purposes such as urban services, bulky goods or offices to meet the demand from displaced businesses closer to the CBD, and therefore negate the positive effect outlined above.

The application states that the site is within the Parramatta Rd corridor, which is targeted for increased housing and jobs. The draft Parramatta Rd Urban Transformation Strategy is currently on exhibition. The site is not within the corridor.

Direction 2.3 Improve housing choice to suit different needs and lifestyles

This direction seeks to encourage a range of housing types. While the proposal has the potential to provide apartments of varying sizes and prices, the housing type will be exclusively apartments, the same typology as that for around 38% of dwellings in the LGA

(*Auburn City Residential Development Strategy 2015*). Council has recently provided for additional apartment opportunities close to the town centres of Auburn and Lidcombe through a significant increase in FSR. The *Residential Development Strategy 2015* identified a distinct split in the existing housing provision between residential flat buildings and single dwellings with very little between. The proposal does not address this gap.

Further, the *Residential Development Strategy 2015* found that there is significant capacity to provide for the projected population growth (as forecast both by the Department of Planning and Environment and by ID Forecasting) under existing controls. This proposal is not required to assist Council in meeting its housing targets.

The proposal is inconsistent with Direction 2.3.

Direction 3.1 Revitalise existing suburbs

While the proposal does not meet the guidelines for proximity to good public transport, redevelopment of the older dilapidated buildings on the site, and a new centre (B1 or B2) co-locating jobs and housing would help to revitalise this area.

These benefits however, are outweighed by other issues identified throughout this assessment.

4.2.2 West Central Draft Subregional Strategy (WCDSS)

The *Draft West Central Subregional Strategy* identifies the 'Silverwater' and 'Parramatta Road Corridor Precinct' as regionally significant and viable clusters of light manufacturing, warehousing, freight and logistics uses comprising 152 hectares and 122.6 hectares (refer Table 7, p.44). These two precincts are classified as Category 1 - Employment Lands (land to be retained for industrial purposes having regional significance) under the WCDSS. The proposal will likely result in constraints on the Category 1 industrial lands directly to the north of the site, and may result in their relocation.

Figure 13 below shows the subject site is located between these two precincts.



Figure 13 - Extract from the WCDSS showing the subject site and its surrounding industrial uses
(Source: Department of Planning 2007, p. 27)

The Planning Proposal application is also inconsistent with Strategic Objective C1- Action C1.3 to '*plan for increased housing capacity targets in existing areas*', as it is not located within an existing urban area focused around a local centre or a corridor that permits residential uses and has good access to public transport.

The WCDSS assigns a dwelling target of 17,000 dwellings for the Auburn LGA for 2031, out of which 6000 dwellings are allocated for the Sydney Olympic Park Authority area. However, Council's *Dwelling Target Analysis* study prepared to inform the *Auburn LEP 2010* found that no further up zonings are required within the Auburn LGA to meet this target.

More recently, the Auburn City *Residential Development Strategy 2015* found that the current controls can meet the increased dwelling need projections for the LGA without further rezoning (see s. 4.2.1).

4.2.3 Draft Centres Policy and Draft Centres Design Guidelines

The application seeks a new local centre, zoned B2, a zoning which has been applied in Auburn City to the centres of Berala, Regents Park and Newington.

The *Draft Centres Policy* sets out a number of planning principles for the development of centres and outlines a sequential approach that should be taken when considering edge-of-centre or out of centre proposals, including:

- A demonstration that there are no suitably zoned sites within the existing centre;
- Where this is not practical or feasible, especially where large format sites are required, edge-of-centre sites can be supported particularly if good connections can be established with the existing centre;
- Out-of-centre stand-alone sites must demonstrate that there are no suitable within-centre or edge-of-centre sites and there is a demonstrated net community benefit.

The proposal for a centre of the scale of a B2 Local Centre is considered to be inconsistent with the above principles. Council has recently increased the permitted floor space ratio in the B4 zones in Lidcombe and Auburn Town Centres, to encourage development within these centres. This is expected to provide a significant contribution to the supply of both housing and commercial space for a growing population, in established centres close to infrastructure, transport and services.

The net community benefit test includes consideration of state and regional strategies and questions such as:

- Is the existing public infrastructure (roads, rail, utilities) capable of servicing the proposed site?
- Is there good pedestrian and cycling access?
- Will the LEP be compatible/ complementary with surrounding land uses? What is the impact on amenity in the location and wider community?
- Will the public domain improve?
- Is the LEP likely to create a precedent or create or change the expectations of the landowner or other landholders?
- What are the public interest reasons for preparing the draft plan? What are the implications of not proceeding at that time?

The applicant has provided a net community benefit test which is discussed under 4.4.2 of this assessment report. The test has a number of inaccuracies and statements that are not supported by evidence. These issues are discussed throughout this report. While it is expected that the proposal would provide some public benefits locally, this assessment report demonstrates that the outcome of a net community benefit test would be negative.

The *Draft Centres Design Guidelines* set out a number of principles for the renewal of existing centres and the location and design of new centres. The application proposes to use the Draft Centres Design Guidelines as a resource to develop the site specific DCP.

However, these guidelines are also relevant at a more strategic level as they support the implementation of the state and regional strategies.

The proposal is inconsistent with some of the key principles relating to the design and location of new centres within walking catchments of good public transport and avoiding land use conflicts (using buildings to buffer residential areas).

The locational matters need to be addressed at the strategic stage. A future DCP can only address the design issues.

4.2.4 Section 117 Directions

Section 117 Directions are directions to Councils from the Minister for Planning and Environment that need to be considered or given effect to in the preparation of draft LEPs.

The planning proposal application is inconsistent with the s.117 Directions including:

- Direction 1.1 - Business and Industrial zones;
- Direction 3.1 - Residential
- Direction 3.4 - Integrating land use and transport; and
- Direction 7.1 - Implementation of the *Plan for Growing Sydney*.

A detailed table outlining the extent to which the application is consistent with the s.117 directions is included at Appendix 6 of this report.

4.2.5 Relevant SEPPs and SREPs (deemed SEPPs)

The planning proposal is inconsistent with the following *State Regional Environmental Planning Policies* (SREPs) and *State Environmental Planning Policies* (SEPPs) below, although it is noted that some of these issues may be addressed post Gateway, if Council proceeds with the Planning Proposal application:

- *State Environmental Planning Policy No.32 - Urban Consolidation*
- *State Environmental Planning Policy No.65 - Design Quality of Residential Flat Building Development*
- *State Environmental Planning Policy No.55 - Remediation of Land*
- *State Environmental Planning Policy (Infrastructure) 2007*

A detailed assessment of SEPPs and deemed SEPPs can be found in Appendix 7.

4.3 Consistency with relevant Local Studies/Strategies/Plans

Relevant local studies and strategies that require consideration for this proposal are:

- *Auburn City Residential Development Strategy, 2015*
- *Auburn Employment Lands Strategy, 2015*
- *Auburn Local Environmental Plan 2010;*
- *Auburn Development Control Plan 2010;*
- *Auburn Community Strategic Plan 2013-2023.*

4.3.1 Auburn City Residential Development Strategy, 2015

The application states that the proposal is consistent with the *Auburn City Residential Development Strategy* (AECOM, 2015) (RDS) because it includes the dwellings proposed under the previous planning proposal for this site in its calculations to estimate the potential of Auburn City Council to meet the Department of Planning and Environment's projected dwelling growth for the LGA. The previous planning proposal had been endorsed for Council at the time, and had not yet been refused at Gateway. It was therefore appropriate to consider it within the *draft RDS* at that time.

However, taking these dwellings into account as they were contained in a proposal at the time, is different to saying that the site is suitable for residential development. While the number of dwellings were included in the assessment of dwelling growth, the analysis of residential capacity in the *RDS* established that land currently zoned R4 High Density Residential and B4 Mixed Use within Auburn City currently has the potential to provide the additional growth in dwelling numbers, based on population forecasts for the area. The dwellings from the subject site are not required to meet projected population growth.

The *RDS 2015* provides a number of recommendations for the location of future residential development. The key relevant recommendations and the consistency of the proposal with these recommendations is outlined in Table 4.

Table 4 – Assessment against the recommendations of the Residential Development Strategy 2015

Relevant recommendations of the RDS	Consistency of proposal
<i>Council's main focus on new housing growth should be within the walking catchment of a town, village or neighbourhood centre.</i>	Proposal seeks high-density residential development outside of any existing centre. It does seek to provide a new centre that would support the increased population.
<i>While facilitating higher densities in centre locations, Council should ensure that amended planning controls also recognise the need to balance the retention of a level of employment lands in these areas, to provide local services and employment for residents.</i>	The proposal would result in the loss of potential employment lands with good exposure to Silverwater Rd. It also has the potential to: <ul style="list-style-type: none"> • set a precedent for the rezoning of more of land from B6 Enterprise Corridor to residential uses; • to result in land use conflict with the adjoining industrial development to the north, that is part of Auburn City's premier industrial area, thereby putting pressure on the industries there to constrain their activities, or even to relocate.

<i>Council should assess the capacity of existing utilities and social infrastructure such as schools and community facilities, to service growth, as well as whether future growth can be serviced by identified commitments to short, medium or long term infrastructure augmentation.</i>	<p>The application is supported by a transport study, which states that the road network can support the proposal. This is not certain however, due to the need for additional information required as outlined elsewhere in this report, identified by the RMS.</p> <p>The application states that schools, bus and rail services, community facilities and utilities can accommodate the addition population, however no evidence is provided to support this.</p>
<i>Future proposals for residential development should be assessed against the urban design / planning principles outlined in the RDS.</i>	One of the key principles in the <i>RDS 2015</i> is locating new residential development within 800m of a railway station. The proposal does not meet this principle.
<i>Open space with good pedestrian and cycle connections should be provided to service the population, in centres where new residential growth is planned.</i>	<p>A cycleway is about 60m from the site at the closest point, but does not connect well across the M4 or Parramatta Rd to provide access to Auburn Railway Station.</p> <p>Two parks are located within walking distance of the site.</p>
<i>Future development in smaller centres should be supported for the positive contribution it can make to the centre character and profile and the effect on stimulating further future investment.</i>	<p>The proposal would provide for a new centre. As such therefore, the centre has no current character. However, the character of the surrounding area is low scale, low density residential and industrial development. The proposal is incompatible with this character.</p> <p>Further, the <i>RDS 2015</i> also states that growth in neighbourhood centres, (referencing Wellington Rd in Auburn and the existing B1 zone in Silverwater, which contains a recently completed development), have the potential for further growth, such as townhouses, shop top housing or low rise multi-dwelling development.</p> <p>The scale of the proposal significantly exceeds the scale envisaged by the <i>RDS 2015</i> for smaller centres.</p>

The proposal is generally considered to be inconsistent with the *Auburn City Residential Development Strategy 2015*.

4.3.2 Auburn Employment Lands Strategy, 2015

The site is located within Precinct 14 within the *Auburn Employment Lands Strategy (Auburn ELS 2015)*. The application considers the earlier draft of this strategy, although the final adopted document was available prior to the lodgement of the current proposal. The final strategy recommends a retail hierarchy that includes a B1 Neighbourhood Centre located somewhere within the area bound by Silverwater Rd, Deakin Park, Hume Park and Carnarvon Rd Silverwater. The proposal seeks a B2 Local Centre.

The application also relies on the recommendation of the *Auburn ELS 2015* to provide for significant additional retail floor space in the northern part of the LGA, including the equivalent of 3-4 full line supermarkets in the event that several major retail proposals do not eventuate. However, the application does not take into account the following:

- The recently constructed retail facilities at Silverwater;
- The approved retail facilities, including a supermarket within the Ferry Wharf development at Wentworth Point;

- The requirement for retail facilities, including a supermarket near the new bridge at Wentworth Point;
- 12,000 - 15,000m² of retail proposed within the Carter St Priority Precinct;
- The two supermarkets recently opened within the 'Power Centre' on Parramatta Rd.

All of the above are within the northern part of the LGA.

The *Auburn ELS 2015* makes a number of recommendations specifically for Precinct 14 which are not addressed by the application. Table 5 outlines the consistency of the proposal with these recommendations.

Table 5 - Consistency of the proposal with the ELS recommendations in relation to Precinct 14

Recommendations and comments of the ELS regarding Precinct 14	Consistency of the proposal
Retain B6 Enterprise Corridor, with existing FSRs.	Inconsistent. Proposes a B2 zone with a substantially greater FSR.
Opportunity to provide a B1 Neighbourhood Centre between Silverwater Rd, Carnarvon and Beaconsfield Streets, but limited by Deakin and Hume Parks, to serve the surrounding area including the neighbouring Silverwater employment precinct.	<p>Inconsistent. Proposes a B2 Local Centre zone within this precinct. This is discussed below.</p> <p>The application incorrectly states that the B2 zone is consistent with the recommendation of the <i>Auburn ELS 2015</i>. However, the adopted <i>Auburn ELS 2015</i> recommends a B1 zone, which was discussed with the applicant at a meeting prior to the lodgement of the application. This inconsistency could be addressed via a proposal to rezone to B1 Neighbourhood Centre.</p>
If a centre is proposed in this precinct, it should provide for a supermarket of up to 2,000 m ² with and clustered ancillary retail and commercial uses of another 1,000m ² – 3,000m ² serving a local convenience role.	<p>While it is acknowledged that the concept plan provides for 4,000m² of retail space, the proposed zoning, B2 Local Centre, permits retail remises, with no maximum limit. The proposal does not provide for a maximum retail limit. However, if residential is permitted to support the viability of redevelopment, the comparative value of the residential and retail spaces would likely result in limiting the retail component to the minimum required in the proposal local provision, which is 2,500m², which falls short of the recommendation for a total of 3,000m² to 5,000m².</p> <p>Further, there is nothing specified in the proposed local provision that would require a supermarket as part of the retail offer, or any size for the supermarket specified.</p>
<p>The precinct should be master planned, to:</p> <ul style="list-style-type: none"> • ensure linkage to the existing open space; • ensure that land fronting Silverwater Rd is retained for business uses as envisaged in the B6 zoning; • ensure that residential uses are limited to that which is required to enable viable development to a centre; • mitigate against land use conflicts with the industrial area to the north; • improve local amenity to attract new businesses in the employment lands; establish the bulk, scale and orientation of the buildings; 	<p>The proposal does not include a master plan of the precinct or address the issues requiring consideration for any new centre in this precinct (see Figure 14) such as capitalising on the existing open space.</p> <p>Retail uses are proposed at ground floor level, with residential above. Generous setbacks for the residential component fronting Silverwater Road could provide greater consistency with this principle and minimise amenity impacts.</p> <p>As discussed in this report, the proposal also:</p> <ul style="list-style-type: none"> • seeks residential development significantly

<ul style="list-style-type: none"> • transition of the B6 lands to the new centre. 	<p>beyond that required to enable viable development of a centre;</p> <ul style="list-style-type: none"> • It provides for residential development directly opposite the industrial area to the north which may result in potential land use conflicts; • It does not consider the transition of the B6 lands to the new centre.
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Proposed zone

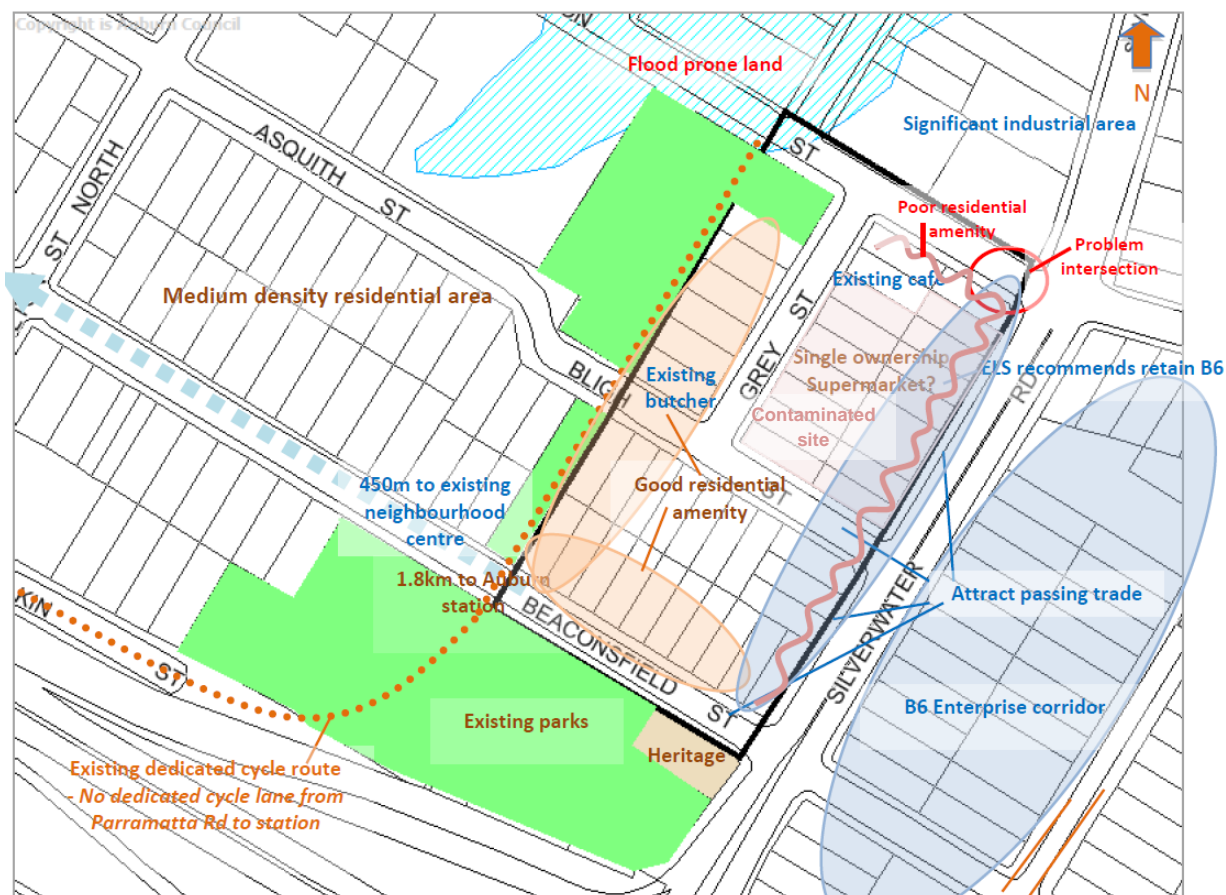
There is no real evidence provided that a centre of the scale envisaged by a B2 zoning under *Auburn LEP 2010* is appropriate, rather than the B1 recommended in the *Auburn ELS 2015* for a site located somewhere within this precinct.

A comparison of the objectives for the two zones is provided in Table 6 and shows that the range and scale of uses that would support the B2 objectives are substantially greater than those in the B1 zone. There is a clear focus on maximisation of public transport use for the B2 zone and an expected setting of high density residential development. This is consistent with the B2 zoning in Berala and Regents Park, located adjoining railway stations, and Newington, which contains a community centre, is located among medium to high density residential development and provides a greater retail offer than this proposal.

Table 6 – Comparison of B1 and B2 zones

B1 Neighbourhood Centre zone objectives	B2 Local Centre zone objectives
<ul style="list-style-type: none"> • <i>To provide a range of small-scale retail, business and community uses that serve the needs of people who live or work in the surrounding neighbourhood.</i> • <i>To ensure development does not adversely affect the amenity of the surrounding neighbourhood.</i> 	<ul style="list-style-type: none"> • <i>To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area.</i> • <i>To encourage employment opportunities in accessible locations.</i> • <i>To maximise public transport patronage and encourage walking and cycling.</i> • <i>To encourage high density residential development.</i> • <i>To encourage appropriate businesses that contribute to economic growth.</i> • <i>To achieve an accessible, attractive and safe public domain.</i>

Figure 14 – Preliminary site analysis for relevant part of Precinct 14



The B1 zone objectives result in a more limited non-residential uses, with mainly retail uses that serve local residents and workers. This is clearly what is envisaged in the *Auburn ELS 2015*. Further, the application itself states that the proposal:

'will deliver new retail and commercial opportunities and services to the meet the daily needs of ...residents....and workers...' (p. 27).

Meeting the daily needs of residents and workers is the intent of a neighbourhood centre. The proposed B2 zone is therefore not considered appropriate in this location.

The Residential Market Appraisal (Hill PDA) provided to support the proposal, concludes that the 600 residents on site will generate about 10% of the proposed supermarket turnover and contribute to the viability of the proposed retail floor space. On this basis, the planning proposal provides weak evidence that a B2 centre is required on the site given the significant amount of residential floor space (19,539m²) proposed to support the proposed 4,000m² retail floor area.

Guiding Principles

The *Auburn ELS 2015* provides a number of guiding principles for business lands. The new centre is consistent with the principles in relation to centres and ground floor retail from the site specific perspective, but it is inconsistent with the following principles:

- *Maintain surplus capacity in business zones. In the B6 zone the availability of land enables the market to respond to market demand and cycles accommodating bulky goods and other employment uses.*

- The proposal, in not addressing the master planning issues raised above, may raise land values making market entry more difficult. The flow on effects may result in a loss of land zoned for employment uses that helps maintain the affordability of industrial land within Auburn LGA;
- *Retain enterprise corridor lands to encourage bulky goods/large floor plate uses where there is demand, and to accommodate a range of other uses.*

The impact on the rest of the B6 zone in this precinct has not been considered in the application. While acknowledging that the *Auburn ELS 2015* also sees an opportunity for a B1 centre in this precinct, as outlined above (under master planning), the proposal is likely to result in pressure to rezone the surrounding B6 lands. While few sites within this part of the precinct currently provide for employment, the redevelopment of substantial areas of employment lands closer to the city anticipated as part of the Parramatta Road Revitalisation project, will likely lead to increased demand for employment lands suitable for Enterprise Corridor uses, such as bulky goods and urban services. Such uses benefit from main road exposure, and need to remain within convenient access of their customers. In particular, it is likely that the redevelopment of the Parramatta Rd corridor will lead to increased demand in Auburn, both on and off Parramatta Rd for land to accommodate displaced businesses closer in.

The proposal is considered to be inconsistent with these general principles for business lands.

For proposals on business zoned lands that are inconsistent with the strategy, the *Auburn ELS 2015* outlines a number of assessment criteria (see Appendix 5). The application has not provided any analysis against these criteria. The analysis above, and in relation to the impact on nearby centres elsewhere in this report, demonstrate that the proposal is inconsistent with a number of these criteria.

4.3.3 Auburn Local Environmental Plan 2010

The proposal is inconsistent with the overarching aims of *Auburn LEP 2010* including the following:

- *To foster integrate sustainable development at contributes to Auburn's environment, social and physical well-being.*

The scale of the residential component is considered inappropriate to the location. The proposed density and the access to relatively limited public transport and services is likely to result in increased reliance on the car.

- *To facilitate economic growth and employment opportunities within Auburn.*

The residential components have the potential to constrain or force adjoining industries to relocate, with potential impacts on regionally significant employment lands. The proposal may set a precedent, for other B6 zoned lands.

4.3.4 Auburn Community Strategic Plan 2013-2023

This plan sets out long term policy goals and underpins Council's project delivery, planning and activities. It seeks to provide for a diverse and inclusive community, attractive and liveable places, healthy and green environment and visionary and responsible leadership. Relevant priority areas include the following:

- Improved planning for residential developments and growth areas;
- Better access to and provision of public transport; and
- Improved traffic management.

It is noted that the subject land is not well located in terms of access to train stations, and bus transport is limited. Inadequate assessment of traffic impacts, particularly cumulative traffic impacts on the surrounding network is identified as an issue. The zone and scale of residential development proposed in this location is not consistent with the *Auburn ELS 2015*.

However, it is noted that these priority areas are very broad, as is appropriate for a long term umbrella strategy document such as a community strategic plan, and that assessment of the proposal against other more detailed state and local plans, provides a more meaningful guide.

4.4 Environmental, Social and Economic Impact

4.4.1 Contamination

The planning proposal is underpinned by the WSP (2012) Site Investigation Report which concluded that the land was suitable for ongoing commercial/industrial land uses with additional works.

The additional works proposed do not actually involve remediation, only an identification of the extent of the migration of contamination in the groundwater. Although the study states it is a phase 2 study, it does not state what works would need to be undertaken as a result of this identification.

The study also found that lead levels in one sample exceeded residential criteria.

This study is insufficient to address the requirements of SEPP 55 as it does not find that the site is suitable for its intended use, in this case, mostly, residential. Further, the study did not include 3 lots at the northern end of the site.

If the proposal is to be progressed to Gateway stage, it is recommended that the contamination study be revised (or a new study undertaken), to ascertain whether the site (including all lots) can be made suitable for residential development and if so, what works would be required.

4.4.2 Economic impact

Potential of the B6 Enterprise Corridor zone

As outlined in Section 4.1, a continuation of the B6 zoning in this precinct:

- Has significant value to the market;

- Has the potential for take up with the displacement of large format premises closer to the city;
- Approved DAs in nearby B6 zones show that the market is already starting to develop.

As outlined in the *Auburn ELS 2015*, an appropriately designed and located B1 centre, with the minimum required residential component to enable redevelopment, would support both the B6 lands and the industrial lands in the vicinity. The location, scale, and residential density of the current proposal, however, are considered to work against this objective.

Retail impact

The current B6 Enterprise Corridor zone under *Auburn LEP 2010* permits office premises, bulky goods, light industry and business premises, with limited retail uses that maintain the economic strength of other local centres within Auburn City. The DP&I 's practice note PN 11-002 dated 10 March 2011 states that: *'retail activity needs to be limited to ensure that Enterprise Corridors do not detract from the activity centre hierarchy that has been identified or planned'* (p.6). The Leyshon study confirmed by the Hill PDA 2015 CER shows the proposed mixed use development would have an immediate -10% (medium impact) on Newington Village and 8.5% (medium impact) on Ermington for retail sales (p.21 and 22), though this would reduce to quite low over about 4 years. The CER does not consider the impact on Sydney Olympic Park or, critically, on the Beaconsfield Rd/Asquith St Silverwater retail area, known as Silver Square, which has just been completed and currently has 27 of the retail premises vacant. This site is less than 500m from the subject site. While the demand for a supermarket has been demonstrated, this is not the case for the extent of shops proposed.

Net community benefit

The CER provides a net community benefit test (Table 8) as required by the *Draft NSW Centres Policy, 2009*. However the assessment against the key criteria provided contains a number of inconsistencies and inaccuracies. The most significant inconsistency is the use of existing housing development as the base case for the community benefit assessment. A few examples are provided below.

The appropriate base case against which the planning proposal should have been tested should have been the permissible land use for the site, which under *Auburn LEP 2010* is B6 Enterprise Corridor. The subject land is located within land identified under the *Auburn ELS 2015* as regionally significant employment lands. At a local level, this land is identified as the primary employment lands for the Auburn LGA.

An assessment of the proposed use against a B6 Enterprise Corridor base case would be required to justify a proposed development given the potential cumulative impacts that could arise as a consequence of the proposal with resultant loss of the strategic surrounding and adjoining B6 Enterprise Corridor and IN1 General Industrial land.

The assessment states that:

'The Subject Site forms part of the Parramatta Road Corridor and Investigation for Transport and Urban Renewal as designated under the Draft Sydney Metropolitan Strategy (2013). As identified in the Planning Proposal, 'providing additional housing as part of the development of the site is aligned with the priorities of the corridor, particularly providing higher population density in proximity to future business investment.'

The site is not part of the *Draft Parramatta Rd Urban Transformation Strategy* and is not identified within it for additional housing.

Further:

'It is considered that the proposed rezoning and development is not inconsistent with the relevant s.117 Ministerial Directions. As outlined in Section 5 of the Planning Proposal, it responds to Direction 1.1 (Business and Industrial Zones) through the delivery of net employment generation on the site.'

The planning proposal is inconsistent with s.117 Direction No 1.1 in that it is likely to result in the loss, not just of the employment zoned land on the subject site, but also nearby B6 lands in the precinct, and potentially Industrial lands in the adjoining precinct. Direction 1.1 requires that areas and locations of existing business and industrial zones be retained, the total potential floor space area for employment uses in business zones not be reduced and that the objectives of the direction are to be given effect where the direction applies.

Contrary to the CER, Council's *Residential Development Strategy* found that new high density zonings are not required to meet the quantum of housing required in the LGA. Adequate investigation and strategic justification for the scale of change envisaged by the planning proposal would need to be underpinned by a local strategy for the area.

The contracted trade areas identified in the most recent market appraisal by Hill PDA show that the retail catchment would extend to Newington, Sydney Olympic Park and North Auburn. The CER shows that some existing centres will lose business to the new centre. For instance, Auburn centre is likely to lose 7.6% of its immediate trade turnover once the centre is functioning, with the impact reducing to around 1.6% with continuing expanding trade and new housing in the area. Auburn centre is walkable from many parts of the North Auburn secondary trade area for the new centre, and Auburn is on the rail line. This means that people will most likely drive to the new centre, rather than walk or catch a train to the Auburn centre.

4.4.3 Residential amenity

The proposal would remove the existing zoning buffer between Silverwater Road and residential uses to the west and south of the precinct (which mitigates noise and other traffic impacts). Further, as previously outlined it would locate high density residential development directly adjacent to a key industrial area.

The concept plan places seven storeys of residential apartments within 6m of the boundary with Silverwater Rd. Based on *Development near Busy Roads and Railways – Interim Guidelines* the *Urban Design Guidelines* for the *Draft Parramatta Rd Urban Transformation Strategy* require a 20m buffer zone to busy roads that includes increased setbacks to residential areas, podium development with non-residential uses, additional landscaping and a variety of other design measures to minimise the impacts of the noise and pollution.

If Council wishes to proceed with the proposal, increased setbacks or building buffers to Silverwater Rd and the industrial area should be considered.

The scale and bulk of the proposal will likely have an adverse impact on the residents of the existing dwellings to the south and west. While this area is zoned B6, 8 storey heights are generally unlikely, and the FSR permitted is well below the proposed 4:1, even for hotel or office premises, which get a bonus FSR under *Auburn LEP 2010*.

The *Auburn ELS 2015* indicates that some residential development is likely to be required to enable the redevelopment of part of the precinct for neighbourhood scale retail shops. The *Economic and Development Feasibility Study* (Hill PDA, October 2013) prepared for the previous proposal, found that neither industrial/office development nor high quality commercial office space and showrooms provided sufficient financial return to warrant redevelopment of the subject site for those purposes in the current market.

However, given the need to protect the remaining B6 lands in the precinct and the industrial lands to the north, the *Auburn ELS 2015* recommends that the residential component should only be enough to enable a feasible redevelopment for a neighbourhood centre. The application does not provide evidence that the proposed extent of residential floor space is required to enable either the 2,500m² minimum shops/commercial uses that would be required under the local provision or the 4,000m² generally referred to, and in the concept plan.

AEC Group prepared feasibility advice for Council to enable a better understanding of the residential floor space required (see Appendix 8). AEC's analysis found that:

- The proposal more than facilitates the provision of 4,000m² of retail space;
- To enable a feasible mixed use development, given an average unit size of 91m² GFA (internal 77.5m²) an indicative FSR is required as follows:
 - Mixed use development with 4,000m² retail, 178 units, DCP parking rates (1/40m² provided in the basement) – FSR of 2.7:1
 - Mixed use development with 4,000m² retail, 211 units, higher parking rates to attract a supermarket (1/25m² provided in the basement) – FSR of 3.3:1;
 - If some of the parking can be provided at-grade or decked the costs and therefore FSR could be reduced.
- If Council determines nevertheless to progress the current proposal as is, it is recommended that Council pursue contributions for public benefit via a voluntary planning agreement. This analysis suggests the proposal would increase site value in the order of \$4 million to \$6million depending on parking provision. Some of this uplift could be captured for public benefit.

In line with this analysis, if the applicant chose to develop only 2,500m² retail in accordance with the proposed local provision, the residential FSR required to support it would be reduced. No analysis of the required residential floor space to enable 2,500m² retail has been carried out.

It is also interesting to compare the details of the recently completed neighbourhood centre, Silver Square, in Silverwater, less than 500m from the subject site. On 6,514m² of land zoned B1 Neighbourhood Centre, it contained a mix of light industrial uses and dwelling houses. This redevelopment has an FSR 1.96:1, is 3 to 4 storeys high, to a maximum of 14m in height. The retail/commercial component is 1,600m² with 27 commercial/retail units. It contains 118 apartments and provides car parking for 252 cars across basement and at grade parking.

APP, on behalf of the applicant has provided a response to the AEC analysis (see Appendix 9). The focus of the response is that while the AEC analysis provides a minimum threshold that would be needed to support provision of retail floor space, the proposed FSR would be generally more valuable and achieve higher sale prices per unit or square metre increasing land values in the area. It would also provide a degree of flexibility in regard to apartment mix and amenity.

This however, does not address the findings of the *Auburn ELS 2015* that increasing land values, prices the types of uses sought in the B6 zone out of the market. The proposed FSR

would therefore prevent the uptake of the surrounding B6 lands, and may force industries to the north to relocate.

4.4.4 Traffic and transport impact

Public transport, walking and cycling

The application states that the subject site has good access to public transport, but also states that there is no access to significant public transport, as explained in s. 4.1.

- Auburn railway station is the closest station at 1.9 kilometres to 2 kilometres walk from the subject site.
- The closest cycle route is within the local parks. They do not however connect via any dedicated cycle lanes to Auburn station on the other side of Parramatta Rd.
- The area is serviced by Sydney bus routes 540 and 544. The 544 route operates between Auburn Railway Station and Macquarie Shopping Centre, and route 540 operates between Auburn Railway Station and Newington Village. The two bus routes operate at 20 to 30 minute intervals from Monday to Friday during morning and afternoon peak times, and have limited bus services during the day during weekdays and weekends. It takes approximately 15-20 minutes to travel from the subject site to Auburn Railway Station during peak times. The closest bus stops to the subject site are at Carnarvon/Stanley Street and Carnarvon/Vore Street approximately 2 to 10 minutes walking distance from the subject site.
- The M92 metro and Veolia bus routes operate between Parramatta Railway Station and Sutherland Railway Station and Bankstown Railway Station via Parramatta Road. The nearest bus stops to access these routes are located approximately 650 metres from the subject site, approximately 15 - 20 minutes walking distance away. The commonly applied walking catchment for a bus is 5 minutes.
- It is likely that most residents and workers will access the site by car due to the poor public transport access.

Traffic and the road network

Both Council and RMS have concerns about the impact on the road network and traffic congestion from the proposal. RMS comments are discussed in detail in s. 4.5.1. In summary more detailed work is required if the proposal progresses to Gateway. Their key concern is that the proposal would set a precedent resulting in cumulative impacts that could affect the function not only of local intersections, but also of Silverwater Rd, a classified road.

Council engineers advise that, if the proposal were to go ahead, traffic signals at Carnarvon St/Silverwater Rd would need careful consideration. Carnarvon St experiences excessive queue lengths during peak hours. The peak hour traffic entering the intersection from the western approach of Carnarvon Street is significantly increased by the proposal with morning peak delays extended by 20% and afternoon peak by over 50%.

Cumulative impacts from the Camellia Precinct redevelopment in Parramatta City Council area would also need to be considered. That project proposes two river crossings over the Duck River. One of these proposed crossings will have significant impact on Carnarvon St and Derby St intersections.

The queue length on Carnarvon Street (exit to Silverwater Road) will interfere with the Grey St/Carnarvon St intersection operation. This may direct the traffic locally and impact on the neighbourhood.

A percentage of traffic will avoid right turn entry into Carnarvon Street from Grey Street and exit via Carnarvon St/Stubbs St to Parramatta Rd. This will impact on the Parramatta Rd/Stubbs St traffic lights.

A percentage of traffic may use Bligh Street and reach Stubbs Street thus impacting on the residential areas.

The impacts on the local road intersections of Carnarvon Street/Grey Street and Grey St/Bligh St and safety of the intersections need to be evaluated.

Additional work is required to assess the potential cumulative impact on traffic, not just for the precinct itself, but also for the broader network including Silverwater Rd itself.

RMS suggests that a better approach would be to master plan the precinct as a whole, so that these cumulative impacts can be better understood.

4.4.5 Natural environment

There are no sensitive indigenous species, communities or populations on or adjacent to the site. Water management measures can be considered at DA stage. Greenhouse emissions will be reduced through compliance with BASIX at the DA stage, however emissions due to transport have been discussed under 4.4.1.

4.5 Commonwealth and State Interests

If Council decides to progress the proposal, a number of government agencies would need to be consulted as required by a Gateway Determination. At this stage only the NSW Roads and Maritime have commented on the proposal.

4.5.1 RMS Submission

Council received preliminary comments in a letter from RMS on the applicant's transport study and SIDRA models. These comments are in Appendix 13.

The RMS stated that the applicant's traffic volume input data included in the SIDRA models did not correctly model the traffic impacts of the proposed mix use development (planning proposal) for the subject site, and that the SIDRA models submitted by the applicant need to be revised and re-submitted if the proposal is to proceed.

RMS advises that additional information is required to ensure that the modelling used is fit for purpose. The intersection of Carnarvon St and Silverwater Rd was modelled as an isolated intersection with optimum cycle time and signal phase input settings. However the intersection forms part of a co-ordinated and linked signal corridor along Silverwater Rd with the cycle time and phasing fixed. RMS requires that the SIDRA modelling be updated with specified parameters.

It also recommends that site observations on blockages in peak periods be undertaken and considered in the modelling.

RMS have provided a final submission (see Appendix 14), noting that they have received updated modelling. They advise that more detailed consideration of the proposal would be undertaken if the proposal is referred to RMS following a Gateway Determination.

However, this formal RMS submission raises particular concern from a strategic perspective:

'Concern is raised that should the planning proposal proceed to gazettal, similar large scale traffic generating developments may occur within this precinct with limited

accessibility to public transport and is likely to have a cumulative traffic impact on the regional road network, including Silverwater Rd.'

The submission goes on to state:

'Council may give consideration to undertaking a strategic investigation of the entire precinct to identify the type, scale and location of appropriate land uses within the precinct, identification of infrastructure to support development and appropriate developer funding mechanisms.'

This is consistent with the approach recommended in Council's *Employment Lands Strategy 2015*.

5.0 How the Application addresses the Gateway Determination

The Gateway Determination (PP_2014_AUBUR_003_00) issued on 22 December 2014 for the applicant's previous planning proposal for the subject land determined that the planning proposal should not proceed for a number of reasons. The previous proposal as submitted to Gateway sought a B2 zoning with a maximum FSR of between 3.75:1 and 4:1.

In evaluating the current proposal for the subject land, an assessment of how this proposal addresses each of the Gateway Determination's reasons for not proceeding with the previous planning proposal is summarised below. Many of these issues have already been discussed in this report.

Gateway Determination:

1. *'The planning proposal is inconsistent with the Auburn Employment Land Study 2008*. The Study identifies the subject site as part of a broader strategic employment precinct that should be retained and protected for new and emerging industries and to avoid rezoning speculation which could undermine the viability of industrial land'.*

*Note the Auburn Employment Lands Strategy 2015 was not completed at the time of the Gateway Determination.

Assessment:

The planning proposal application does not address how the proposed rezoning to B2 Local Centre will address this issue, specifically how B2 Local Centre zoned land (which includes residential development) will relate to the IN1 zoned land of the significant Silverwater Industrial Precinct, immediately north of the subject site. It also does not address the issue of protection of employment land, and viability of industrial land.

Gateway Determination:

2. *'The proposal to rezone the subject land from B6 Enterprise Corridor to B2 Local Centre would reduce land considered to be strategically and regionally important employment land and permit non-employment generating uses. This has the potential to create significant land use conflict within the area but also undermine the role of the B6 Enterprise Corridor zone in Auburn City and ensures that employment land is protected during a period of high residential growth across the local government area'.*

Assessment:

The planning proposal application and supporting economic study, focus on justification of B2 Local Centre land from a retail catchment perspective, and argue that the proposed retail on the subject site will not draw retail trade away from other retail centres such as Newington Neighbourhood Centre, Lidcombe and Auburn Town Centres.

However, it does not address the reduction in strategically and regionally significant employment-generating land, potential land use conflicts that may arise, nor does it address the cumulative impact of the loss of B6 Enterprise Corridor zoned land/protection of employment land during the current high growth period.

3. *'Proposed rezoning of the subject site to B2 Local Centre is unlikely to contribute to strengthening or maintaining the existing industry cluster, and the introduction of a centre that provides for land uses that are inconsistent with the objectives of this cluster may impact the long term provision of freight and industrial land in Auburn City'.*

Assessment:

The planning proposal application and supporting economic study submitted by the applicant does not address the issue of strengthening or maintaining industry clusters, which play an important role for employment generating land in both the B6 Enterprise Corridor and IN1 General Industrial zones.

Gateway Determination:

4. *'The planning proposal is inconsistent with section 117 Direction 1.1 Business and Industrial Zones as it will reduce the potential floor space for employment generating land uses. Permitting residential development at the proposed density will undermine the ongoing operation of the Silverwater Industrial Precinct and set an undesirable precedent for rezoning industrial land for residential purposes'.*

Assessment:

The planning proposal application does not satisfactorily address inconsistency with the section 117 Direction 1.1 Business and Industrial zones, which seeks to protect employment land in business and industrial zones. The application does not provide sufficient justification for the proposed zone change, nor for the introduction of residential development and the potential impact it may have on the ongoing operation of the regionally significant Silverwater Industrial estate, immediately to the north of the subject land.

Gateway Determination:

5. *'The planning proposal application is inconsistent with strategic objective B4 of the West Central Draft Subregional Strategy, Strategic Objective B4 – Action B4.1 supports the “concentration of retail activity in centres, business development zones and enterprise corridor zones”. The planning proposal is inconsistent with Action B4.1 as it would facilitate the development of out-of-centre retail uses'.*

Assessment:

The current application for a planning proposal proposes an out-of-centre retail development, which is considered to be inconsistent with the *West Central Draft Subregional Strategy*, Strategic Objective B4 of the – Action B4.1 “Concentrate retail activity in Centres Business Development zones and Enterprise Corridor zones”. The subject land to which the application applies is located some distance (approximately 1.5 and 2.6 kms) from Auburn and Lidcombe Town Centres, both of which are located around railway stations.

Gateway Determination:

6. *'The planning proposal is also inconsistent with the Strategic Objective C1-Action C1.3 which supports “increased housing capacity targets in existing areas”. The proposal is inconsistent as it is not located within the existing area that supports residential*

development, focused around a local centre or a corridor that permits residential uses and has good access to public transport’.

Assessment:

The application proposes residential development (via rezoning) in an area currently zoned B6 Enterprise Corridor, with a clear employment-generating focus, which does not sufficiently address this Strategic Objective. The proposal seeks high density residential development in an out-of-centre location (beyond a walking catchment of a centre), which has limited access to public transport.

Council’s *Auburn Residential Development Strategy 2015* established that land zoned R4 High Density Residential and B4 Mixed Use within Auburn City currently has the potential capacity to accommodate anticipated growth, based on population forecasts for the area, as well as meet State government dwelling targets. The proposal, as submitted, does not provide sufficiently justification to address this issue raised in the Gateway Determination.

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6.0 Community Consultation

The application for the Planning Proposal was publicly exhibited from Tuesday 4 August 2015 to Tuesday 8 September 2015 in accordance with *Council's Communication Plan for Planning Proposals* as adopted by Council.

A notice was placed in the Auburn Review of 4 August 2015, an electronic copy of the relevant documentation was published on the Auburn Council website under the 'on exhibition' tab, and hard copies of the relevant documentation were made available at Council's Administration Building, Auburn Library, and the Lidcombe Library. Letters were also mailed to all owners within the notification area identified on the map at Appendix 10.

A total of 13 submissions (including 2 petitions) were received as summarised in Table 8 below.

Type of submission	Submissions received
Support	1
Objections	9
Petitions (objecting)	2
Agency submission	1

Table 8 - Submissions received during the notification period

Eleven of the 13 submissions received by Council objected to the proposal. This included two petitions with a total of 119 signatures. Among the petitioners were 8 businesses in the surrounding area. One submission supported the proposal.

The objecting submissions raised concerns that the proposal was substantially the same as the previous application that was refused following Gateway consideration. In particular, the potential for aggravated traffic and access conditions, car parking and amenity within the locality of the subject site were raised. The submissions also stated that the proposal would be out of context, result in a loss of significant business enterprise corridor land and could result in land use conflict.

One submission supported the proposal stating that the proposed business centre would bring added vitality to the area and provide for low level retail services for the existing residents and businesses.

The submissions and petitions that objected to the proposal raised common issues. These issues and brief comment are set out below and included:

- Inconsistency with state government policy which does not identify the residential area of Silverwater (in the vicinity of the subject land) as a growth area;
- Proposal is contrary to the aims of ALEP 2010, does not address the potential cumulative impacts of the proposal;
- Proposal does not justify why the proposed B2 zoning is most suited to the subject site/ the existing B1 neighbourhood centre nearby at Silverwater has a number of vacant retail premises/loss of B6 corridor and threats to regionally significant employment land (zoned IN1), immediately north of the subject land;

- the likely negative impact on traffic movement and congestion in surrounding streets such as Bligh, Grey and Carnarvon Streets which would further exacerbate existing congestion and traffic delay issues already occurring in the area, particularly in Carnarvon Street;
- proposal is likely to generate traffic impacts at the Stubbs St/Parramatta Road intersection, and this has not been assessed in the study;
- the planning proposal will create high density mixed use development which is out of character with its context and surrounding/ the FSR of up to 4:1 proposed is too high when compared to its existing surroundings and other local centres;
- the planning proposal will increase the number of dwellings and households, resulting in an increase in cars parked on the street;
- the planning proposal will create noise pollution, overshadowing and amenity impacts;
- the subject site is not well serviced by public transport and not located within walking distance of a railway station; and
- the 2012 Contamination Assessment concluded that the suit was suitable for commercial/industrial land use only, and not for residential purposes.

Comment:

- Inconsistencies with NSW Government planning policy are noted and discussed in this assessment report. State Planning policy does not identify the residential area of Silverwater in the vicinity of the subject site as a growth centre, urban renewal area or priority precinct.
- The proposal does not address the potential cumulative impacts of the proposed scale of development on other sites within the locality, nor justify why provision of the proposed B2 local service retail is most suited to the subject site.
- The AEC feasibility assessment of the proposal undertaken on behalf of Council, indicates that a minimum FSR of 2.7:1 would permit viable development that included 4,000m² of retail.
- In terms of traffic impacts, updated traffic modelling is required by the RMS for the Carnarvon Street/Silverwater intersection. The Stubbs Street/Parramatta Road intersection also warrants an assessment in light of potential traffic moving through the local neighbourhood to travel west or east and avoid the Silverwater Road/Carnarvon Street intersection.

A table summarising the key points raised in each submission and the response of Council staff is at Appendix 11. On request, a summary of the community submissions was provided to the applicant. The applicant's response to submissions is at Appendix 12 with comments from Council staff.

7.0 Summary and Recommendation

The key issues for Council's consideration are summarised below.

Proposal does not satisfactorily address the reasons for refusal in the Gateway Determination

The planning proposal application continues to be inconsistent with the Draft West Central Subregional Strategy and Ministerial Direction 1.1 Business and Industrial Zones, and fails to provide sufficient justification that employment land would be protected during this current period of high growth.

Proposal is inconsistent with relevant state and local plans and strategies

State plans

As outlined above, the proposal is inconsistent with key Ministerial directions, state plans, and state environmental planning policies.

If the proposal was to proceed, it could potentially threaten other land zoned B6 Enterprise Corridor within Auburn City. Given the high residential growth Auburn City is currently experiencing, and the State Government's plans for renewal along the Parramatta Road Corridor, it is important to retain land zoned for different types of employment uses, to provide employment options for Auburn City's growing population.

Local plans

The proposal is inconsistent with the recommendations and guiding principles of the *Auburn ELS 2015*, which seeks to retain and protect industrial lands in Precinct 14 (which includes the subject land), and Precinct 5, the Silverwater Industrial Precinct, which is identified as regionally and strategically significant employment land. The guiding principles of this strategy seek to prevent encroachment of sensitive land uses, such as residential development, which could result in land use conflict and threatened viability of industry and businesses in the area. The guiding principles also seek to retain land values at an affordable price for large format employment uses, which is important for employment in the long term, and particularly during periods of high population growth.

However, notwithstanding the above, the *Auburn ELS 2015* noted that if a new centre was to be considered in Precinct 14; that a B1 Neighbourhood Centre zone was recommended, reflecting the centre's envisaged role as one of local convenience. The *Auburn ELS 2015* also recommended that if residential was to be included as part of the new neighbourhood centre, that it be '*limited to that which is required to enable viable development for a centre*' (p 79 AELS 2015).

Traffic and transport impacts

Both the RMS and Council's engineers have raised concerns about the impact of the proposal on the road network and potential traffic congestion from the proposal. The RMS has indicated that additional work is required to properly assess the potential cumulative impact on traffic for

the broader network including Silverwater Road, a classified road (not just the immediate precinct). Carnarvon St in particular, experiences excessive queue lengths during peak hours. The RMS also notes the limited accessibility of this precinct to public transport, recommending that Council take a strategic approach to the planning for this whole precinct, including identification of appropriate infrastructure to support development and appropriate developer funding mechanisms.

Appropriateness of a B2 Local Centre Zone in this location

Concerns associated with loss of B6 Enterprise Corridor zoned-land have been outlined. Rezoning of the subject land would also remove a zoning buffer (B6) between Silverwater Road and residential properties to the west of the site. However, in line with the resolution of December 2013 [380/13], Council may still wish to pursue the creation of a new small centre in this location. The *Auburn ELS 2015* recommended that a new neighbourhood centre could be considered west of Silverwater Road, located somewhere in the area bound by Carnarvon Street, Beaconsfield Street, and Deakin and Hume Parks. This strategy recommends a B1 Neighbourhood Centre zone, and envisages the centre would have a local convenience role, similar to that of centres such as Botanica, Silverwater, and Wellington Road (which sit below the larger local centres zoned B2 such as Berala, Newington and Regents Park, in the retail hierarchy).

The *Auburn ELS 2015* further recommended that if residential was to be permitted within Precinct 14, that the land which fronts Silverwater Road be maintained for business uses, and that residential development is limited to that which is required to enable viable development of a neighbourhood centre (page 79, *Auburn ELS 2015*). This is further supported by Council's recently adopted *Residential Development Strategy 2015*, which indicates that Council has more than sufficient capacity to meet dwelling targets.

Feasibility Analysis

Additional feasibility analysis of the current proposal, undertaken by the AEC Group on behalf of Council to assist with the assessment of this proposal, was sought following the refusal of an almost identical planning proposal at Gateway by the Department of Planning in December 2014. This feasibility analysis was also undertaken to address the recommendations of Council's subsequently adopted *Auburn ELS 2015* (May 2015), relating to limiting residential development to that required to enable viable development of a new centre. This feasibility analysis concluded that an FSR of 2.7:1 would be the minimum required to provide feasible mixed use development on the subject land. This FSR of 2.7:1 assumes the application of Council's standard DCP car parking rate of 1 space per 40 sqm of retail floor space, and the provision of 4,000 sqm of retail floor space (comprising a 3,500 sqm supermarket, and 500 sqm of specialty retail).

The proposal as it currently stands, seeks a significantly higher FSR. This is contrary to the recommendations of Council's adopted *Auburn ELS 2015*, which recommended the protection of B6 zoned land. This strategy further recommended that if residential uses were to be considered within Precinct 14 as part of a new mixed use development, that residential uses be limited to that which is required to enable viable mixed use development.

In summary, whilst the Auburn ELS 2015 recommended retaining B6 uses as a preference for Precinct 14, it also recommended that a new neighbourhood centre could be accommodated within this area, having a local convenience role. It recommended a B1 zoning for the new centre, and recommended that any residential be limited to that which is required for viable development of a neighbourhood centre. Further feasibility analysis undertaken by consultants on behalf of Council has identified and recommended an FSR which would achieve this.

Inconsistencies with state and local plans have been discussed throughout the report, and would need further justification by the applicant, if the planning proposal was to proceed. Similarly, the RMS and Council's traffic engineers have identified concerns about the traffic impacts, particularly cumulative traffic impacts on the surrounding network, should the proposal proceed in its current form. Additional detailed traffic modelling would be required to address the RMS concerns.

If Council wishes to proceed with a rezoning to create a new local centre in this area, it is recommended that the proposal be amended to reflect the zoning and height controls recommended in the Feasibility Analysis (AEC Group), which directly responds to the recommendations of Council's *Auburn ELS 2015*. It is also recommended that additional traffic modelling be undertaken to the satisfaction of the RMS, and that satisfactory justification for the inconsistencies with state and local plans and strategies be provided by the applicant.

8.0 Appendices

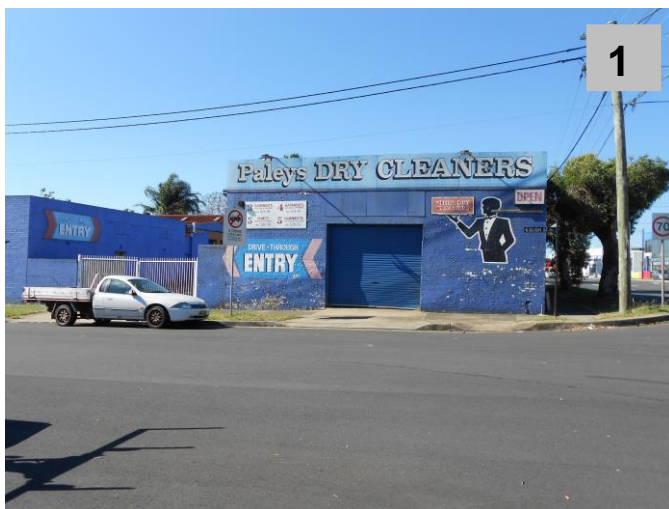
Appendix 1 – Gateway Determination of previous proposal for the site – PP-5/2013

T122065/2014

Appendix 2 - Photos of subject site and surrounds

The subject site relating to the planning proposal is outlined in black in the location map shown below. Numbers indicate approximate locations of site photographs taken and shown in the following pages.





View of the subject site showing buildings facing the corner of Bligh and Silverwater Road



View of the subject site showing vacant buildings facing Silverwater Road



View of the subject site showing vacant buildings facing Silverwater Road



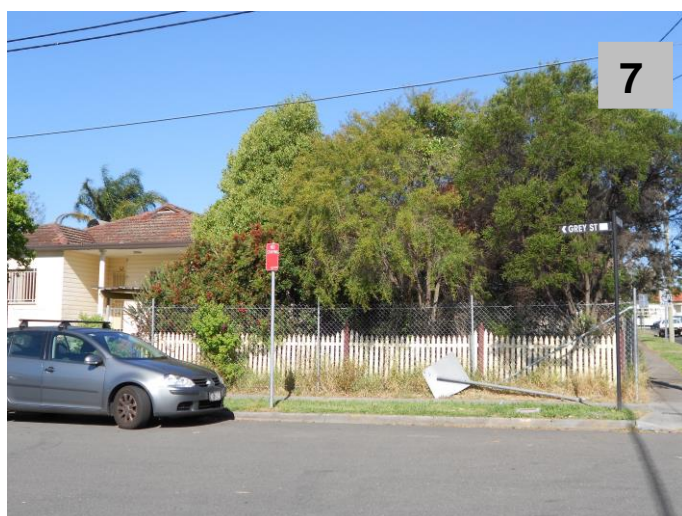
View of buildings on the subject site along the northern edge of Carnarvon Street



View of the subject site showing buildings facing the corner of Grey and Carnarvon Streets



View of buildings on the subject site facing Grey Street



View of buildings on the subject site facing Grey Street



View of buildings on the subject site facing Bligh Street

Surrounding areas:



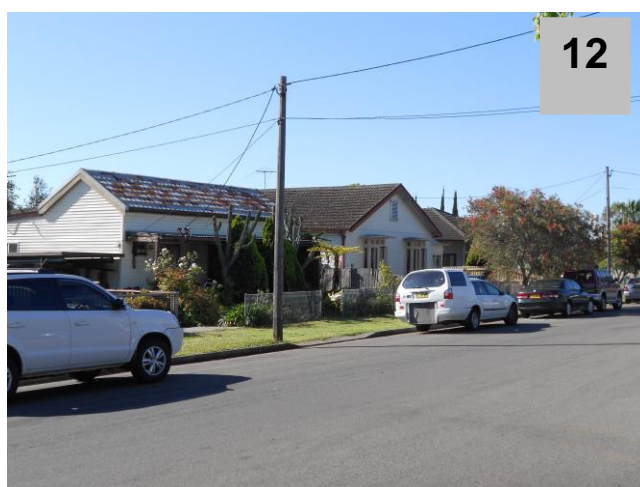
View of industrial buildings located north of the subject site facing Carnarvon Street



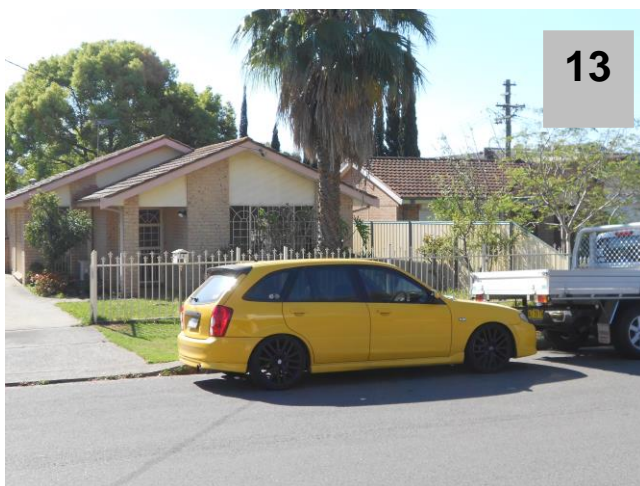
View of industrial buildings located north of the subject site facing Carnarvon Street



View of industrial buildings facing Stanley Street located adjacent to the subject site



View of buildings located west of the subject site facing Grey Street



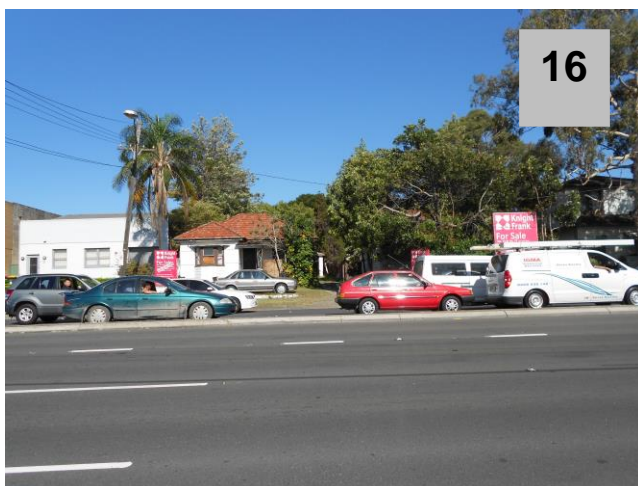
View of buildings located west of the subject site facing Grey Street



View of buildings located west of the subject site facing the corner of Grey and Bligh Streets



View of buildings located south of the subject site facing Bligh Street



View of buildings located east of the subject facing Silverwater Road



View of buildings located east of the subject site facing Silverwater Road

Appendix 3 - Details of the subject site (zoning, land use)

Property address	Auburn LEP 2010 zoning and lot size	Proposed or existing land uses
32-34 Silverwater Road, SILVERWATER (Former Paley's site)	B6 Enterprise Corridor (775m ²)	Is currently approved by Council as a dry cleaners establishment since 1997 to date. The site consists of a single storey brick building which has ceased its commercial operations and is no longer in use.
38 Silverwater Road, SILVERWATER	B6 Enterprise Corridor (840m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased its operations and is no longer in use.
40 Silverwater Road, SILVERWATER	B6 Enterprise Corridor (397m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased its operations and is no longer in use.
42 Silverwater Road, SILVERWATER	B6 Enterprise Corridor (394m ²)	Consists of a vacant single storey fibro dwelling which has ceased its operations and is no longer in use.
44 Silverwater Road, SILVERWATER	B6 Enterprise Corridor (405m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased its operations and is no longer in use.
46 Silverwater Road, SILVERWATER	B6 Enterprise Corridor (417m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased its operations and is no longer in use.
48 Silverwater Road, SILVERWATER	B6 Enterprise Corridor (382m ²)	Consists of a vacant site without any buildings.
17 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (416m ²)	Consists of a single storey detached fibro dwelling which is currently occupied.
15 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (447m ²)	Functions as a take away food business attached to a single storey detached fibro dwelling that is currently occupied.
13 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (422m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use
11 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (421m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use
9 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (411m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use
7 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (414m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use
5 Grey Street, SILVERWATER	B6 - Enterprise Corridor zone (402m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use
3 Grey Street, Silverwater	B6 Enterprise Corridor zone (407m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use
1 Grey Street, SILVERWATER	B6 Enterprise Corridor zone (345m ²)	Consists of a vacant single storey detached fibro dwelling which has ceased operations and is no longer in use

Note: The land parcels shown in grey are not owned by the applicant.

Appendix 4 - Applicant's Planning Proposal Application and Supporting Studies

Planning proposal application	- T075183/2015
Appendix A Concept plans	- T075170/2015
Appendix B Contamination Assessment	- T075176/2015
Appendix C Transport Report	- T075178/2015
Appendix D Consolidated Economic Reports	-T075180/2015
Residential Market Appraisal	- T075181/2015

Appendix 5 – Assessment Criteria for Inconsistent Planning Proposals on Business Zoned Lands

Auburn Employment Lands Strategy (AEC Group, 2015)

No.	Criteria	Rationale
General		
1	Would the proposal impact the achievement of West Central subregional economic or employment targets?	The proposal should contribute to the objectives established for economic and employment growth for the West Central Subregion. Recognising the finite supply of existing business zoned lands, a proposal that facilitates the intensification of business floorspace would contribute to accommodating employment growth.
2	Does the proposed rezoning impact business land stocks in the subregion and thus the ability to meet future demand for business land activity at subregional level?	The maintenance of sufficient business zoned land stocks within the Subregion is important for the future economic prosperity of the wider metropolitan region. Business land that is part of a Local Centre would play a larger role than business land within a neighbourhood centre and should be considered in that context.
3	Would the proposal impact Auburn's ability to meet future local demand for business zoned employment land?	Auburn must ensure an adequate supply of business zoned land to meet the economic and employment needs of its population. This could involve an intensification of business lands which facilitates floorspace for a greater number of employees. A proposal should have regard to impact on the future viability and expansion prospects of nearby employment uses.
4	Would the proposal impact the achievement of employment targets and objectives?	Is employment proposed and if so what is the nature and quantum of that employment. Would it accommodate employment that supports Auburn's future population and economic growth?
5	Would the proposal detract from or undermine the overall viability of established centres?	The continued viability and prosperity of existing centres should be considered in terms of acceptable impact.
B6 Enterprise Corridor		
9	Is the site near or within direct access of key economic infrastructure such as a major arterial road?	Good access is important for the viability and future sustainability of Business lands, from the point of view of employees, suppliers and customers. Viable clusters of business lands in strategic locations should be nurtured and allowed to prosper.
10	Does the site contribute to a significant business cluster and would the rezoning prejudice the future of that cluster to continue to operate viably and effectively?	Loss of a major element of a significant business cluster can weaken the viability of the remaining parts of the cluster, resulting in a decline in employment opportunities and the overall health of the local economy.
11	Would the proposal provide for more retail, industrial, commercial or local service employment opportunities?	This would provide a positive strengthening of the local economy and boost local employment.

Appendix 6 - Consistency with section 117 directions

No.	Title	Consistency
1.1	<p>Business and industrial zones <i>What a relevant planning authority must do if this direction applies</i></p> <p>A planning proposal must:</p> <ol style="list-style-type: none"> (a) give effect to the objectives of this direction, (b) retain the areas and locations of existing business and industrial zones, (c) not reduce the total potential floor space area for employment uses and related public services in business zones, (d) not reduce the total potential floor space area for industrial uses in industrial zones, and <p>ensure that proposed new employment areas are in accordance with a strategy that is approved by the Director-General of the Department of Planning.</p> <p><i>Consistency</i></p> <p>A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are:</p> <ol style="list-style-type: none"> (a) justified by a strategy which: <ol style="list-style-type: none"> (i) gives consideration to the objective of this direction, and (ii) identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and (iii) is approved by the Director-General of the Department of Planning, or (b) justified by a study (prepared in support of the planning proposal) which gives consideration to the objective of this direction, or 	<p>Inconsistent</p> <p>The Planning Proposal application proposes to rezone the subject site from B6 Enterprise Corridor zone to a B2 Local Centre zone under <i>Auburn LEP 2010</i>, reducing the extent of B6 Enterprise Corridor lands in the LGA. The applicant argues that this is justified as the actual employment generating floor space would be increased, with 4,000m² of retail/commercial space. However:</p> <ul style="list-style-type: none"> • The local provision would enable redevelopment for residential uses with only 2,500m² of retail/commercial space; • While a B1 Neighbourhood Centre in the general vicinity is supported by the Auburn Employment Lands Strategy, the proposal is inconsistent with a number of the considerations recommended for such a centre, and may set a precedent for further loss of B6 lands; • The high density residential component may result in a land use conflict with the industrial sites to the north, potentially resulting in loss of employment uses from this premier industrial area.

	<p>(c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or</p> <p>(d) of minor significance.</p>	
1.2	Rural zones	N/A
1.3	Mining, petroleum production and extractive industries	N/A
1.4	Oyster aquaculture	N/A
1.5	Rural lands	N/A
2.1	Environment protection zones	<p>N/A</p> <p>No lands of environmental sensitivity are affected.</p>
2.2	Coastal protection	N/A
2.3	Heritage conservation	<p>Consistent</p> <p>The proposal does not seek to change the heritage provisions in the LEP, which are consistent with the Standard Instrument LEP. There are no heritage affected sites within the vicinity of the site.</p>
2.4	Recreation vehicle areas	N/A
3.1	<p>Residential zones</p> <p><i>What a relevant planning authority must do if this direction applies:</i></p> <p>A planning proposal must include provisions that encourage the provision of housing that will:</p> <ul style="list-style-type: none"> (a) broaden the choice of building types and locations available in the housing market, and (b) make more efficient use of existing infrastructure and services, and (c) reduce the consumption of land for housing and associated urban development on the urban fringe, and (d) be of good design. <p><i>Consistency</i></p> <p>A planning proposal must, in relation to land to which this direction applies:</p> <ul style="list-style-type: none"> (a) contain a requirement that residential development is not permitted until land is adequately serviced (or arrangements satisfactory to the council, or other appropriate authority, have been made to service it), and (b) not contain provisions which will reduce the permissible residential 	<p>Inconsistent</p> <p>This direction applies as the proposal seeks to provide for significant residential development in a zone that permits residential uses.</p> <p>The proposal does not include a statement regarding servicing of the land as required by the Direction. This could be included if the proposal were to proceed to Gateway. Servicing requirements would be better understood following consultation with the relevant utilities.</p> <p>The proposal encourages housing, but seeks to provide for apartments, a building type already adequately represented in the LGA, in a location that is considered less suitable for high density residential development of this scale. Housing choice is discussed under the Plan for Growing Sydney- Direction 2.3.</p>

	density of land	
3.2	Caravan parks and manufactured home estates	N/A
3.3	Home occupations	N/A Does not change permissibility of home occupations.
3.4	<p>Integrating land use and transport</p> <p><i>What a relevant planning authority must do if this direction applies</i></p> <p>A planning proposal must locate zones for urban purposes and include provisions that give effect to and are consistent with the aims, objectives and principles of:</p> <p>(a) Improving Transport Choice – Guidelines for planning and development (DUAP 2001), and</p> <p>(b) The Right Place for Business and Services – Planning Policy (DUAP 2001).</p> <p><i>Consistency</i></p> <p>A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are:</p> <p>(a) justified by a strategy which:</p> <p>(i) gives consideration to the objective of this direction, and</p> <p>(ii) identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and</p> <p>(iii) is approved by the Director-General of the Department of Planning, or</p> <p>(b) justified by a study prepared in support of the planning proposal which gives consideration to the objective of this direction, or</p> <p>(c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or</p> <p>(d) of minor significance.</p>	<p>Inconsistent</p> <p>Planning Proposal seeks to rezone the land to include a high rise/density mix use development located outside the existing centres within the LGA.</p> <p>The proposal is inconsistent with <i>Improving Transport Choice – Guidelines for Planning and Development</i> (DUAP 2001). As stated in page 34 the suggested walkable catchment for a railway station is 800-1000 metres of an existing or programmed metropolitan station. With reference to the Planning Proposal the closest existing railway station is Auburn at 1.9km walking distance from the Auburn Railway Station.</p> <p>Due to its location beyond the walking catchment of good public transport and Auburn Centre, redevelopment as proposed would likely result in:</p> <ul style="list-style-type: none"> Increased dependence on cars; Residential density at a scale and intensity beyond that appropriate to its location. <p>It is therefore inconsistent with the aims of the Direction and with aims, objectives and principles of the identified policies.</p>

3.5	Development near licensed aerodromes	N/A
3.6	Shooting ranges	N/A
4.1	Acid sulfate soils	Consistent. The subject site is on class 5 acid sulfate soils, which is the least affected category.
4.2	Mine subsidence and unstable land	N/A
4.3	Flood prone land	The subject site is not located within a Flood Planning Area identified under the <i>Auburn LEP 2010</i> .
4.4	Planning for bushfire protection	The proposal will not affect, nor is in proximity to land mapped as bushfire prone land.
5.1	Implementation of regional strategies	N/A
5.2	Sydney drinking water catchments	N/A
5.3	Farmland of state and regional significance on the NSW Far North Coast	N/A
5.4	Commercial and retail development along the Pacific Highway, North Coast	N/A
5.5	Development in the vicinity of Ellalong, Pazton and Millfield (Cessnock LGA) (revoked)	N/A
5.6	Sydney to Canberra Corridor (revoked)	N/A
5.7	Central Coast (revoked)	N/A
5.8	Second Sydney Airport: Badgerys Creek	N/A
6.1	Approval and referral requirements	Consistent. The proposal does not include provisions that require concurrence, consultation or referral of a development application to a Minister or State public authority. Nor does it identify any development as designated development.
6.2	Reserving land for public purposes	The planning proposal to rezone does not involve zonings or reservation of land for public purposes.
6.3	Site specific provisions <i>What a Relevant Planning Authority must do if this direction applies</i> A planning proposal that will amend another environmental planning instrument in order to allow a particular development proposal to be carried out must either: <ul style="list-style-type: none"> (a) allow that land use to be carried out in the zone the land is situated on, or (b) rezone the site to an existing zone already applying in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or (c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal 	Inconsistent, but justified. The proposal seeks to include a local provision that would ensure retail premises of a minimum quantum are provided as part of any redevelopment under the proposed zoning. The business centre zones under Auburn LEP 2010 permit residential flat buildings, so if the proposal were progressed, a local provision would be required to ensure that the retail component sought by the Employment Lands Study in this precinct is provided.

	<p>environmental planning instrument being amended.</p> <p>A planning proposal must not contain or refer to drawings that show details of the development proposal.</p>	<p>The proposal includes a concept plan, but it is purely indicative.</p>
7.1	<p>Implementation of a <i>Plan for Growing Sydney</i></p> <p>Planning proposals shall be consistent with:</p> <p>(a) the NSW Government's <i>A Plan for Growing Sydney</i> published in December 2014.</p> <p><i>Consistency</i></p> <p>A planning proposal may be inconsistent with the terms of this direction only if the Relevant Planning Authority can satisfy the Secretary of the Department of Planning & Environment (or an officer of the Department nominated by the Secretary), that the extent of inconsistency with A Plan for Growing Sydney:</p> <p>(a) is of minor significance, and</p> <p>(b) the planning proposal achieves the overall intent of the Plan and does not undermine the achievement of its planning principles; directions; and priorities for subregions, strategic centres and transport gateways.</p>	<p>Inconsistent</p> <ul style="list-style-type: none"> • The proposed high density residential centre is not within the walking catchment of frequent public transport (ie rail); • It does not support priority industries. • It has the potential to negatively impact on surrounding employment lands resulting in a net negative effect on the number of jobs. • It does not address the recognised gaps in housing choice or affordability in the LGA. <p>This is discussed in detail in s. 4.2.1.</p>
7.2	Implementation of Greater Macarthur Land Release Investigation	N/A

Appendix 7 - Consistency with SEPPs and deemed SEPPs

State Environmental Planning Policies

No.	Title	Summary	Application
1	Development Standards	Seeks to provide flexibility in the application of planning controls where strict compliance of development standards would be unreasonable, unnecessary or hinder the attainment of specified objectives of the Act.	Does not apply to Auburn LGA. SEPP repealed by clause 1.9 of the <i>Auburn LEP 2010</i>)
14	Coastal Wetlands	Seeks to ensure the State's coastal wetlands are preserved and protected.	Does not apply to Auburn LGA. Applies to specified land under the National Parks & Wildlife Act, the Tomago Aluminium Smelter (Newcastle) and land to which SEPP 26 applies.
15	Rural Landsharing Communities	Seeks to facilitate the development of rural landsharing communities committed to environmentally sensitive and sustainable land use practices.	Does not apply to Auburn LGA.
19	Bushland in Urban Areas	Seeks to protect bush land within urban areas. Specific attention to bush land, remnant and endangered vegetation and bush land zoned or reserved for public open space.	Applies to the Auburn LGA. The subject site to be rezoned is not affected by bush land or within close proximity of bush land. Consistent.
21	Caravan Parks	Seeks to facilitate the proper management and development of land used for caravan parks catering to the provision of accommodation to short and long term residents.	Applies to the State. Excludes land to land to which SEPP (Western Sydney Parklands) applies. Consistent
26	Littoral Rainforests	Seeks to protect littoral rainforests from development.	Does not apply to Auburn LGA
29	Western Sydney Recreation Area	To enable the carrying out of development for recreational, sporting and cultural purposes within the Western Sydney Recreation Area	Does not apply to Auburn LGA Applies to land within Western Sydney Parklands - Eastern Creek, Prospect, Horsley Park and Hoxton Park
30	Intensive Agriculture	Requires development consent and additional requirements for cattle feedlots and piggeries.	Applies to the State. The proposal is not for a cattle feedlot or piggery. Not relevant
32	Urban Consolidation	Seeks to facilitate urban land redevelopment on lands no longer required for the current	Applies to all urban land, except Western Sydney Parklands under that SEPP.

No.	Title	Summary	Application
		zoning for multi-unit housing and related development in a timely manner.	<p>Inconsistent</p> <p>Council is required to consider the aims and objectives of the SEPP in preparing a planning proposal.</p> <p>The land is well located to support future development for the uses intended under the current B6 zone, given its high exposure to Silverwater Rd, and given the likely displacement of such uses from closer to the city, eg through the Parramatta Rd Urban Transformation Project.</p> <p>The application would result in high density residential development apartments in an area not well served serviced by public transport, the road network and potentially community facilities and would not meet the locational objectives of the policy.</p> <p>It would not address the need to diversify housing types, as apartments are already well represented in the LGA.</p>
33	Hazardous and Offensive Development	Seeks to provide additional support and requirements for hazardous and offensive development	<p>Applies to the State.</p> <p>The proposal does not seek to provide for hazardous or offensive development. Not relevant.</p>
36	Manufactured Home Estates	Seeks to facilitate the establishment of manufactured home estates as a contemporary form of residential housing.	<p>Does not apply to Auburn LGA.</p> <p>Applies to land outside the Sydney Region.</p>
39	Spit Island Bird Habitat	Seeks to enable development for the purposes of creating and protecting bird habitat.	<p>Does not apply to Auburn LGA.</p> <p>Applies to land comprising Spit Island, Towra Point and Kurnell</p>
44	Koala Habitat Protection	Seeks to encourage proper conservation and management of areas of natural vegetation that provide habitat for koalas	<p>Does not apply to the Auburn LGA.</p> <p>Auburn LGA not listed in Schedule 1</p>
47	Moore Park Showground	Seeks to enable redevelopment of Moore Park Showground consistent with its status as being of State and regional planning importance.	Does not apply to the Auburn LGA
50	Canal Estate Development	Prohibits canal estate development	<p>Applies to the State, except Penrith Lakes.</p> <p>Canal estate development is not proposed.</p> <p>Not relevant.</p>

No.	Title	Summary	Application
52	Farm Dams and other works in land management areas	Requires environmental assessment under Part 4 of the EPA for artificial water bodies carried out under farm plans that implement land and water management plans.	<i>Does not apply to the Auburn LGA</i>
55	Remediation of Land	Provides a state-wide planning approach for the remediation of contaminated land.	<p>Applies to the State</p> <p>Inconsistent</p> <p>A Phase 1 and 2 Environmental Investigation accompanies the application, however, the study is insufficient to address the requirements of SEPP 55 as it does not find that the site is suitable for its intended use, in this case, residential. Nor does it include all of the lots within the subject site. If the proposal is to be progressed to Gateway stage it is recommended that the contamination study be revised (or a new study undertaken), to ascertain whether the site can be made suitable for residential development and if so, what works would be required.</p> <p>This matter is discussed in s. 4.4.1.</p>
59	Central Western Sydney Regional Open Space and Residential	To provide for residential development on suitable land as identified in the Policy to assist in accommodating the projected population growth of Western Sydney	<p><i>Does not apply to the Auburn LGA</i></p> <p>Applies to land identified as Regional Open Space Zone and Residential Zone within the Western Sydney Parklands</p>
62	Sustainable Aquaculture	Seeks to encourage and regulate sustainable aquaculture development	<p>Applies to the State</p> <p>The application does not propose aquaculture.</p> <p>Not relevant.</p>
64	Advertising and Signage	Seeks to regulate signage (but not content) and ensure signage is compatible with desired amenity and visual character of the area.	<p>Applies to the State</p> <p>The proposal does not include signage. The SEPP would need to be considered were any future DA to be lodged for signage.</p> <p>Not relevant.</p>
65	Design Quality of Residential Flat Development	Seeks to improve the design qualities of residential flat building development in New South Wales.	<p>Applies to the State, excluding Kosciusko SEPP area</p> <p>Inconsistent</p> <p>The proposal includes a concept plan of 2 buildings of 5 and 8 storey mixed use development with 250 residential units. While the detail provided is insufficient</p>

No.	Title	Summary	Application
			<p>to properly consider the extent to which the proposal could meet the design quality principles of the SEPP and the requirements of the <i>Apartment Design Guide</i>, it is apparent that the concept plan would be inconsistent with principles such as responsiveness to its surrounding built form context, scale, density, amenity, landscape and aesthetics.</p> <p>A detailed assessment Against the SEPP would be undertaken at DA, should the planning proposal progress to this point.</p> <p>Surrounding land to the south, east and west will remain zoned B6 enterprise corridor and land to the north will remain zoned 1N1 General Industrial. Residential accommodation is not permitted in these zones and hence building separation/setback requirements to adjoining residential accommodation is not applicable. However greater consideration needs to be given to separating the residential uses from adjoining existing/future industrial uses within the subject site itself to reduce potential land use conflict.</p> <p>More work would be required if the proposal proceeds beyond Gateway and may result in the need to reduce the height and FSR.</p>
70	Affordable Housing (Revised Schemes)	Seeks to insert affordable housing provisions into EPIs and to address expiry of savings made by EP&A Amendment (Affordable Housing) Act 2000.	<p>Does not apply to Auburn LGA.</p> <p>Applies to land within the Greater Metropolitan Region. Specifically mentions Ultimo/Pymont precinct, City of Willoughby and Green Square.</p>
71	Coastal Protection	Seeks to protect and manage the natural, cultural, recreational and economic attributes of the New South Wales coast.	<p>Does not apply to Auburn LGA.</p> <p>Applies to land within the coastal zone, as per maps of SEPP.</p>
	Affordable Rental Housing	To provide a consistent planning regime for the provision of affordable rental housing and facilitate the effective delivery of affordable housing	<p>Applies to the State</p> <p>If a DA for housing under this SEPP is lodged it will be considered at that stage.</p> <p>Not relevant.</p>
	Building Sustainability Index: BASIX 2004	The aim of this Policy is to ensure consistency in the implementation of the BASIX scheme throughout the State	<p>Applies to State</p> <p>To be considered at DA stage</p> <p>Not relevant.</p>
	Exempt and	Seeks to provide streamlined	Applies to the State.

No.	Title	Summary	Application
	Complying Development Codes 2008	assessment process for development that complies with specified development standards.	To be considered at development stage. Not relevant.
	Housing for Seniors or People with a Disability 2004	Seeks to encourage the provision of housing to meet the needs of seniors or people with a disability.	Applies to the State Should an application for this type of housing be lodged it would be at DA stage, and would be considered in detail at that stage. Not relevant.
	Infrastructure 2007	<p>The aim of this Policy is to facilitate the effective delivery of infrastructure across the State. Specifies exempt and complying development controls to apply to the range of development types listed in the SEPP.</p> <p>Provides for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.</p>	<p>Applies to the State</p> <p>Inconsistent</p> <p>The site fronts Silverwater Road, a classified state road that generates high noise and traffic volumes. The proposal needs to consider the potential to be consistent with Clauses 100 to 102 of the SEPP. Consideration of the impact of noise and vibration on sensitive land uses is required. Reference is made to the requirement to address Development near Rail Corridors and Busy Roads – Interim Guideline in this regard. The proposal does not consider this Guideline.</p> <p>Site location is not consistent with the strategic aims of the Guideline while the concept plan does not consider how buildings or setbacks could be used to buffer the residential component from the noise and vibration as recommended in the Guideline.</p> <p>The SEPP also requires consideration of the impact on the functioning of Silverwater Rd itself.</p> <p>RMS has expressed concern about the potential cumulative impacts on Silverwater Rd, that could result from this high density residential precedent, on the function of Silverwater Rd.</p> <p>The inconsistencies with the SEPP, lead to uncertainty about the proposed FSR and height.</p> <p>If the proposal is progressed beyond Gateway, any future DA would also need to be referred to RMS. However, at that stage it is too late to address this issue through good planning for the precinct as a whole.</p>
	Kosciuszko National Park – Alpine Resorts 2007	Seeks to protect and enhance the natural environment of the alpine resorts area.	<p>Does not apply to Auburn LGA.</p> <p>Applies only to specified land within Kosciuszko National Park, Kosciuszko Road and Alpine Way.</p>

No.	Title	Summary	Application
	Kurnell Peninsula 1989		Does not apply to Auburn LGA. Applies to the land within Sutherland Shire known as Kurnell Peninsula. Excludes some land under SSLEP 2006.
	Major Development 2005	Aims to facilitate the development or protection of important urban, coastal and regional sites of economic, environmental or social significance to the State. Also to facilitate service delivery outcomes for a range of public services.	Applies to transitional Part 3A projects within the State, subject to Schedule 6A of the EP&A Act. No application under this SEPP has been made for this site. Not relevant.
	Mining, Petroleum and Extractive Industries 2007	Seeks to provide for the proper management and development of mineral, petroleum and extractive material resources	Applies to the State including coastal waters The application does not propose any mining, extractive or agricultural activities. Not relevant.
	Miscellaneous Consent Provisions 2007	Aims to permit the erection of temporary structures with consent across the State Aims to ensure that development comprising the subdivision of land, the erection of a building or the demolition of a building, to the extent to which it does not already require development consent under another environmental planning instrument, cannot be carried out except with development consent.	Applies to the State Applicable at the development stage. Not relevant.
	Penrith Lakes Scheme 1989	Aims to provide a development control process establishing environmental and technical matters which must be taken into account in implementing the Penrith Lakes Scheme in order to protect the environment,	Does not apply to Auburn LGA Not relevant.
	Rural Lands 2008	Seeks to facilitate the orderly and economic use and development of rural lands for rural and related purposes	Does not apply to the Auburn LGA.
	SEPP 53 Transitional Provisions 2011	Aim is to enact transitional provisions consequent on the repeal of State Environmental Planning Policy No 53—Metropolitan Residential Development.	Does not apply to the Auburn LGA. Applies to land within the Ku-ring-gai local government area.
	State and	Aims to identify State significant	Applies to the State

No.	Title	Summary	Application
	Regional Development 2011	development and State significant infrastructure. Also to confer functions on joint regional planning panels to determine development applications.	Consistent
	Sydney Drinking Water Catchment 2011	Aims to provide for healthy water catchments that will deliver high quality water while permitting development that is compatible with that goal.	<i>Does not apply to the Auburn LGA</i> Applies to land within the Sydney drinking water catchment.
	Sydney Region Growth Centres 2006	Aims to co-ordinate the release of land for development in the North West and South West Growth Centres.	<i>Does not apply to Auburn LGA.</i> Applies to all land in a 'growth centre' (North West Growth Centre or the South West Growth Centre)
	Three ports 2013	Aims to provide a consistent planning regime for the development and delivery of infrastructure on land in Port Botany, Port Kembla and the Port of Newcastle,	<i>Does not apply to Auburn LGA.</i>
	Urban Renewal 2010	To facilitate the orderly and economic development and redevelopment of sites in and around urban renewal precincts	<i>Does not apply to Auburn LGA.</i> Applies to land within a potential precinct – land identified as a potential urban renewal precinct. This includes Redfern-Waterloo, Granville and Newcastle.
	Western Sydney Employment Area 2009	To promote economic development and the creation of employment in the Western Sydney Employment Area by providing for development	<i>Does not apply to Auburn LGA.</i> Applies to land within Penrith, Blacktown, Holroyd and Fairfield LGAs. Refer to <i>State Environmental Planning Policy (Western Sydney Employment Area) 2009 Land Application Map</i> .
	Western Sydney Parklands	Seeks to ensure the Western Sydney Parkland can be developed as urban parkland to serve the Western Sydney Region.	<i>Does not apply to the Auburn LGA.</i> Applies to land within the Blacktown, Fairfield and Holroyd LGAs (Quakers Hill to West Hoxton)

Regional Environmental Plans (deemed SEPPs)

No	Title	Summary	Application
8	Central Coast Plateau	Seeks to implement the state's urban consolidation policy.	Does not apply to the Auburn LGA. Applies to nominated land in the NSW Central Coast.
9	Extractive Industry No. 2 1995	Seeks to facilitate development of extractive industries in proximity to the population of the Sydney Metropolitan Area.	Does not apply to the Auburn LGA. Applies to LGAs listed in Schedule 4 of the SREP.
16	Walsh Bay	Seeks to regulate the use and development of the Walsh Bay area.	Does not apply to the Auburn LGA. Applies to land within the City of Sydney and within Sydney Harbour.
18	Public transport corridors	Seeks to protect provision for future public transport facilities.	Does not apply to the Auburn LGA. Applies to the Fairfield, Parramatta, Holroyd and Baulkham Hills LGAs.
20	Hawkesbury Nepean	Seeks to protect the Hawkesbury-Nepean River System.	Does not apply to the Auburn LGA. Applies to certain LGAs within Greater Metropolitan Region.
24	Homebush Bay Area	Seeks to encourage the coordinated and environmentally sensitive development of the Homebush Bay area.	Does not apply to land to which ALEP 2010 applies (clause 1.9). Applies to rest of Auburn LGA – refer to <i>State Environmental Planning Policy (Major Development) Amendment (Sydney Olympic Park) 2009 Land Application Map</i> . Not relevant.
26	City West	Seeks to promote the orderly and economic use and development of land within City West.	Does not apply to the Auburn LGA. Applies to land shown as City West area (Pyrmont and Ultimo).
30	St Marys	Seeks to support the redevelopment of St Marys by providing a framework for sustainable development.	Does not apply to the Auburn LGA. Applies to specified land within the Blacktown and Penrith LGAs.
33	Cooks Cove	Seeks to regulate development of the Cooks Cove site.	Does not apply to the Auburn LGA. Applies to land specified as Cooks Cove in the suburb of Arncliffe (Rockdale LGA).
	Sydney Harbour Catchment	Seeks to ensure the catchment, foreshores, waterways and islands of Sydney Harbour are recognized, protected, enhanced and maintained.	Applies to all land identified on Sydney Harbour Catchment Map (includes Auburn LGA) Water management measures at the DA stage could address the catchment requirements of this instrument. Consistent.

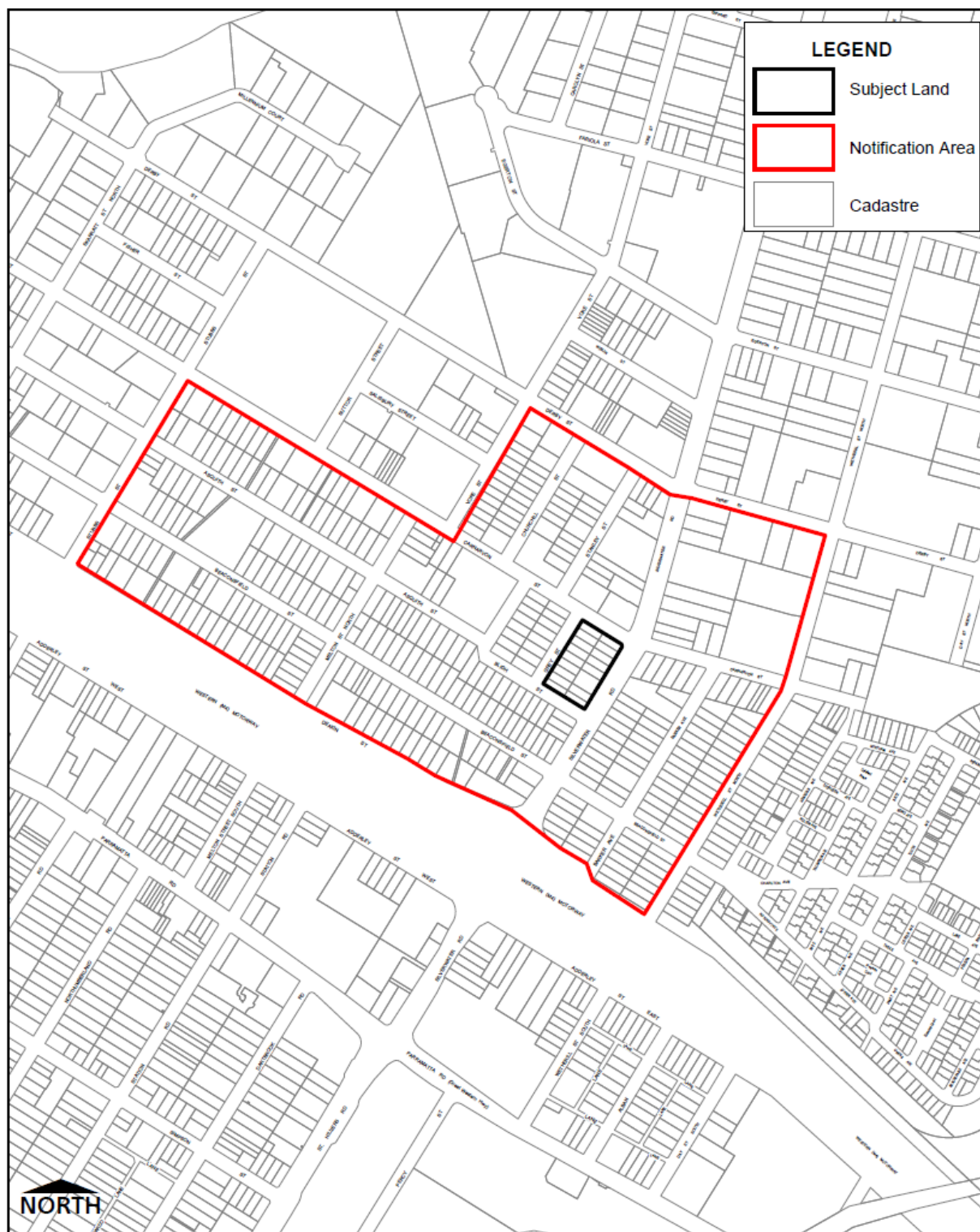
Appendix 8 – Feasibility analysis of the proposal – AEC Group

Trim: T100587/2015

Appendix 9 – Applicant’s response to AEC’s Feasibility Analysis

Trim: T100208/2015

Appendix 10 - Map showing notification area



Appendix 11 - Community Consultation – Summary of submissions received and Council staff response

Ref No	Submission issues	Response
1	<p>Support for Planning Proposal.</p> <p>Local resident enthusiastic about the possibility of local / walkable additional retail uses such as a supermarket and restaurants / cafes, and the increase in local population which would make the area more "vibrant".</p>	Noted and reported to Council.
2	<p>Objection to Planning Proposal</p> <p>This proposal to change the current zoning from enterprise zoning to B2 for high-rise is inappropriate for the site. It will cause conflicts in the future by placing residential living among a precinct with heavy vehicles, industry and the noise or dust generated. It will create worse traffic congestion in the area which is already gridlocked during the peak periods. The site has been designated enterprise as it was deemed to be a corridor for providing employment and industry rather than retail or residential areas. This proposal would cause an undesirable shift of mixing industrial land with residential building. It is not near a railway station where high-rise units are built. The area does not have other high-rise residential buildings nearby at all.</p>	<p>Noted:</p> <p>The assessment report discusses concerns about residential uses in this location, including amenity, heavy traffic volumes on Silverwater Road, compatibility with industrial uses within the B6 Enterprise Corridor zone and IN1 General Industrial zone, which generate heavy vehicles movements, noise and dust emissions.</p> <p>The report also discusses that site is not located within or near any existing centres or mass transit nodes, and implications of this.</p>
3	<p>I feel that a much better plan for the rezoning of the Grey St block to B2 zoning would be to rezone all the current B6 zone west of Silverwater Rd, encompassing Beaconsfield St, Bligh St and all of Grey St.</p> <p>I own a house on Bligh St and feel it would be unfair to the rest of us to have this development right across the road without the opportunity to</p>	<p>Noted.</p> <p>The following concerns about the proposed rezoning of the land to B2 Local Centre are identified in the assessment report to Council:</p> <ul style="list-style-type: none"> It represents a significant shift to primarily high rise residential development in an area identified for future business uses

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	<p>be involved and reap the same benefits.</p> <p>The likelihood of being able to sell under the current zoning is minimal and I will be disadvantaged and have to put up with a huge disruption as it is being built and ongoing with a much increased population and the resulting traffic and parking problems that will come with it.</p>	<p>fronting a classified regional road and in close proximity to the M4 and Parramatta Road.</p> <ul style="list-style-type: none"> It is inconsistent with NSW State Government planning policy in terms of its location within strategic employment lands and the Government's priority economic sector's direction to support key industrial (employment) lands with appropriate planning controls. An assessment of the proposed use on the surrounding B6 Enterprise Corridor land and adjoining IN1 General Industrial land would be necessary to demonstrate potential impact of the proposal on the future of the regionally strategically Silverwater Employment and Enterprise Corridor lands.
4	<p>Objection to Planning Proposal</p> <p>I would like to, on behalf of my family, and neighbours in the area, submit this absolute rejection of the planning proposal for the following reasons:</p> <ol style="list-style-type: none"> My family would be one of many families that will be highly disadvantaged – loss of sun during quite a considerable period of time during the day, especially during the winter, if this proposal goes ahead. Enjoying the sun is our right, and all these families rights, there is absolutely no reason why we should ever give up our rights, for a developer's benefit! No reason at all. So we will, in our absolute terms, reject the proposal. Putting a high rise residential building in an industrial zone, would be extremely unfair to the local residents in general. – Normally residents living close to an industrial area would experience high amounts of busy traffic and noise during the business day and especially business hours. However, once these times are over, residents could still have some relatively quieter period, and quieter days for the families. But putting a high rise building 	<p>Noted.</p> <p>The assessment report discusses concerns about residential uses in this location, including amenity, heavy traffic volumes on Silverwater Road, compatibility with industrial uses within the B6 Enterprise Corridor zone and IN1 General Industrial zone, which generate heavy vehicles movements, noise and dust emissions.</p> <p>The report also discusses that site is not located within or near any existing centres or mass transit nodes, and implications of this.</p> <ul style="list-style-type: none"> The impact of additional traffic resulting from proposed residential development on the regional road network has not been demonstrated and further modelling is required by the RMS. The proximity and vacancy rate of the nearby neighbourhood centre west of the subject site (79-87 Beaconsfield Road, Silverwater), to the subject land is discussed in the assessment report to Council. This report also notes that demand for services in a higher order B2 Local Centre in the proposed location has not been demonstrated. The future of the rest of the B6 Enterprise Corridor land for employment related activities may be compromised via the amount

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	<p>nearby, completely removes these only little quiet enjoyments of life left for the local residents in the area. Traffic and noise generated by families living in the high rise and their visitors would be very disruptive.</p> <p>3. It is also a huge loss of privacy, they couldn't even feel comfortable to keep windows and curtains opened, or have a family barbecue at the backyard, because all these people living on high rise could look straight through their windows, and their backyards. Having this little quiet peace of enjoyment is extremely crucial to all local families' lives, especially in an inner west neighbourhood.</p> <p>4. Rezoning B6 to B2 this parcel of land and putting a high rise residential there would definitely affect the use of the remaining B6 parcels of surrounding land, which would most likely lead to devaluation of lands of local residents' homes, which are currently in B6 zone.</p> <p>5. There have already been extremely jammed traffic conditions during the mornings and afternoons at the red light crossing at the corner of Silverwater Road and Carnarvon St, putting an extra 226 apartments would just create an even worst nightmare for the existing local residents and local businesses.</p> <p>Please let me quantify this nightmare: heavy traffic would come from the west side of Carnarvon Street into Silverwater Road in the morning, mainly from the local businesses. It takes close to 5 minutes each time the red light turns green, and that allows approximately 10-20 vehicles to go through. I counted one time, it let only 11 vehicles to go through.</p> <p>Putting a 226 apartments building there, say every apartment has at least one car and they all need to go out to M4 or Auburn direction to work in the morning, so they all have to go through the red light crossing between Carnarvon Street and Silverwater Road.</p>	<p>of high rise residential development as currently proposed. However the report to Council outlines feasibility analysis undertaken by consultants on behalf of Council, which identifies the amount of residential development (including a proposed overall FSR) that would be required to make a centre with 4,000 sqm of retail viable on the site.</p> <ul style="list-style-type: none"> The proposal is inconsistent with State Government planning policy as the cumulative impact on the regionally significant employment lands in this location has not been tested to ascertain what the future of the surrounding B6 Enterprise Corridor and adjoining IN1 General Industrial land would be.

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	<p>Then, it would take at an extra hour or two just for the residents from this building to get through.</p> <p>Would that mean that local businesses then have to start working one hour early, and finish work one hour late? What about the existing local residents?</p> <p>Such development would affect the existing business and living condition of existing residents very badly.</p> <p>6. There aren't that many parking lots available for the local residents and local businesses. Residents at 14 Grey Street, Silverwater told me that sometimes they have to even park their car on their lawn because the street is so full that no parking is available.</p> <p>Now, can you imagine if there are extra 226 apartments – families or groups of co-habitants there, when sometimes they might need to just quickly go into their apartments so they prefer to park to their cars on street, and/or when their visitors are coming, etc. That would create a huge parking problem for the existing local residents and businesses.</p> <p>7. It is definitely not an appropriate location for 5-10 floors apartment buildings, considering its proximity to the industrial area, to the jammed traffics and high level of noise, and it's very far distance to train station, shops and facilities. The area is lack of public transport facilities as well. (a local resident told me that buses stop operating there very early at nights, especially on the weekends).</p> <p>8. Even putting our interests aside, this PP-5/2013 is still a terrible proposal. What Auburn Council really needs to be aware is that, this proposal does not mention anything regarding the fact that, there are 7 industrial chimneys very closed-by to the site. These industrial chimneys were not designed for anyone living at an altitude of 20-30 meters nearby. There could be a huge health concern with this proposal.</p>	

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	<p>9. There aren't that many parcels of B6 land available, rezoning B6 to B2 is a huge waste to the Auburn community as a whole. A good parcel of B6 land like that should be reserved for (a) good business(es) coming into the area, which could create more permanent jobs; or at least the land should be used for retails, such as ALDI, Coles, or a simple shopping village or shopping complex with restaurants. That could provide convenience to the local residents, local businesses, and the commuters travelling through. The block of land could be an extremely convenient place for food, considering so many industrial companies and firms nearby, together with local residents.</p> <p>I would suggest that Council should emphasise bringing more businesses into the area, rather changing valuable business zoning to accommodate interests of developers. Only more businesses into the area, would promote long term prosperity for the local residents at large..</p> <p>Please find attached a petition of names and signatures of all families and business represented by this letter.</p>	
5	<p>Objecting to Planning Proposal</p> <p>We, the citizens of the suburb of Silverwater NSW 2128 all of which are council voters, petition auburn council to reject the planning proposal affecting land at 1-17 Grey Street and 32-48 Silverwater Road Silverwater.</p> <p>The increase of the maximum building height of the subject land from 14m to a maximum building height ranging from 16.9 meters to 32 meters and increase of the floor space ratio of the subject land from 1:1 to 1:3.75 would be overwhelming and degrading to the quiet suburban streets there is no shortage of apartments or commercial/retail in the area many surrounding developments still</p>	<p>Noted.</p> <p>Creation of a B2 Local Centre on the subject land is considered inappropriate for the following reasons:</p> <ul style="list-style-type: none"> • The proposed height (16.9m – 32m) and FSR (4:1) increases will result in a bulk and scale incompatible with Council's planning controls for the land (currently height 14m and FSR 1:1, 1.5:1 for bulky goods and 2:1 for office premises and hotel/motel accommodation). • Independent Feasibility advice provides an indicative only, minimum FSR of 2.7:1 with 178 units to enable a 4000m2 retail space to be viable.

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	<p>have apartments and commercial/retail for sale and rent.</p> <p>Importantly the proposed building height will negatively affect many homes natural sunlight essential for lighting, laundry and garden, furthermore reduced essential natural airflow will also negatively affect many homes.</p>	<ul style="list-style-type: none"> The proposed high rise buildings are likely to have some impact on solar access to residential dwellings in the surrounding area to the west contrary to Council's DCP objectives and planning controls for solar amenity. However this would be considered in detail at the DA stage, should the proposal proceed to this point.
6	<p>Objects to Planning Proposal Height & FSR</p> <p>Supports Rezoning from B6 to B2.</p> <p>I object the planning proposal PP-3/2015.</p> <p>Maximum height increase and FSR control have not been addressed from previous planning proposal documented in forwarding email shown below.</p> <p>I welcome the rezone proposal from B6 to B2, however oppose the maximum build height increase and FSR increase. The proposed height is with no consideration for neighbouring environment and residents. The proposed height is an invasion of privacy and will rob approximately 50% of Bligh street from solar access and dramatically reduce cooling summer breeze shown in previous shadow and wind diagrams. These facts will result in reduced solar panel effectivity increasing carbon footprint. Facts will also result with increased energy consumption and increased carbon footprint</p> <p>I ask council to refuse proposal for reasons stated and maintain 14 meter maximum height.</p>	<p>Noted.</p> <ul style="list-style-type: none"> The proposed high rise buildings are likely to have some impact on solar access to residential dwellings in the surrounding area to the west contrary to Council's DCP objectives and planning controls for solar amenity. However this would be considered in detail at the DA stage, should the proposal proceed to this point.
7	<p>Objection to Planning Proposal</p> <p>I am against this development.</p> <p>It is too tall for the area - all other buildings in Silverwater are a maximum of three stories high so such a development will not fit into the landscape. The area is already overcrowded with more and more</p>	<p>Noted.</p> <ul style="list-style-type: none"> The proposed high rise buildings are likely to have some impact on solar access to residential dwellings in the surrounding area to the west contrary to Council's DCP objectives and planning controls for solar amenity. However this would be considered in

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	<p>medium density housing being built. There are traffic and parking pressures in the streets and a new building of this size with many residents and businesses will make things much worse for the residents of Silverwater. Furthermore, such a tall structure will block morning sunlight from the houses on the west side of Grey Street, which impacts negatively on those residents' quality of life, as well as being detrimental to property values. We have sufficient business and shopping in the area with Newington being close by, and the new shopping centre at Lidcombe.</p> <p>I ask for consideration for the residents of Silverwater and that this development not be allowed to go ahead.</p>	<p>detail at the DA stage, should the proposal proceed to this point.</p> <ul style="list-style-type: none"> • The proposal will increase traffic generation and congestion in an existing heavily trafficked environment, particularly during peak periods. The impact of additional traffic resulting from proposed residential development on the regional road network has not been demonstrated and further modelling is required by the RMS. • The retail impact on the new centres at Lidcombe and Silverwater has not been addressed in the application.
	<p>I am against this development.</p> <p>It is too tall for the area- all other buildings in Silverwater are a maximum of three stories high so such a development will not fit into the landscape. The area is already overcrowded with more and more medium density housing being built. There are traffic and parking pressures in the streets and a new building of this size with many residents and businesses will make things much worse for the residents of Silverwater. Furthermore, such a tall structure will block morning sunlight from the houses on the west side of Grey Street, which impacts negatively on those residents' quality of life, as well as being detrimental to property values. We have sufficient business and shopping in the area with Newington being close by, and the new shopping centre at Lidcombe.</p> <p>I ask for consideration for the residents of Silverwater and that this development not be allowed to go ahead.</p>	<p>Noted.</p> <ul style="list-style-type: none"> • The proposed high rise buildings are likely to have some impact on solar access to residential dwellings in the surrounding area to the west contrary to Council's DCP objectives and planning controls for solar amenity. However this would be considered in detail at the DA stage, should the proposal proceed to this point. • The development standards as proposed are incompatible with the desired height and density characteristics sought for the remaining B6 lands. • The proposal will increase traffic generation and congestion in an existing heavily trafficked environment, particularly during peak periods. The impact of additional traffic resulting from proposed residential development on the regional road network has not been demonstrated and further modelling is required by the RMS.
9	<p>I am against this development.</p> <p>It is too tall for the area- all other buildings in Silverwater are a</p>	<p>Noted.</p> <ul style="list-style-type: none"> • The proposed high rise buildings are likely to have some impact

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	<p>maximum of three stories high, so such a development will not fit into the landscape.</p> <p>The area is already overcrowded with more and more medium density housing being built. There are already traffic and parking pressures in the streets, and a new building of this size with many residents and businesses will make things much worse for the residents of Silverwater.</p> <p>Furthermore, such a tall structure will block morning sunlight from the houses on the western side of Grey Street, which impacts negatively on those residents' quality of life, as well as being detrimental to property values.</p> <p>We have sufficient businesses and shopping outlets in the area, with Newington being close by, as well as the new shopping centre at Lidcombe.</p> <p>I ask for consideration for the residents of Silverwater, and that this development be REFUSED.</p>	<p>on solar access to residential dwellings in the surrounding area to the west contrary to Council's DCP objectives and planning controls for solar amenity. However this would be considered in detail at the DA stage, should the proposal proceed to this point. The proposed height and density is considered incompatible with the desired future character of the B6 lands.</p> <ul style="list-style-type: none"> • The proposal will increase traffic generation and congestion in an existing heavily trafficked environment, particularly during peak periods. The impact of additional traffic resulting from proposed residential development on the regional road network has not been demonstrated and further modelling is required by the RMS. • The proximity and vacancy rate of the nearby neighbourhood centre west of the subject site (79-87 Beaconsfield Road, Silverwater), to the subject land is discussed in the assessment report to Council. This report also notes that demand for services in a higher order B2 Local Centre in the proposed location has not been demonstrated.
10	<p>I am writing to you again to object to the building proposal 32-48 Silverwater Rd Silverwater.</p> <p>I refer to the letter I sent you on the 16-8-2013 for the planning proposal PP-5/2013, where I outlined my objections, the main objection was the lack of parking and the additional traffic this building would create, changing the zoning will not change the traffic.</p> <p>As a resident of the area, I can only see that the addition of 200 plus units and shops will only create more parking and traffic problems for the residents.</p>	<p>Noted.</p> <ul style="list-style-type: none"> • The proposal will increase traffic generation and congestion in an existing heavily trafficked environment, particularly during peak periods. The impact of additional traffic resulting from proposed residential development on the regional road network has not been demonstrated and further modelling is required by the RMS.
11	<p>I object to the proposal to rezone the above land from B6 Enterprise Corridor to B2 Local Centre.</p> <p>The proposal would be a massive overdevelopment of the land</p>	<p>Noted.</p> <ul style="list-style-type: none"> • The assessment report discusses concerns about residential uses in this location, including amenity, heavy traffic volumes on Silverwater

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	<p>resulting in a reduction in the amenity of the adjacent residential area. The proposal comprises four high density mixed use (retail, commercial and residential) towers up to 32 metres high on a podium that would be a visual blight on the area with unacceptable adverse environmental impacts.</p> <p>The existing B6 Enterprise Corridor zoning for the land should be retained which allows development up to 14 metres height. However there are no existing dwellings or industrial buildings in the surrounding Silverwater area higher than three stories or approximately 9 metres high. Rezoning of the land to allow higher densities, an increased floor space ratio and increased height limits would set a precedence for further high rise mixed use and residential development in the existing low rise Silverwater area. The high rise proposal would not be compatible with the surrounding residential area.</p> <p>The proposal including 250 residential units (600 residents) and 4,000m² of retail/commercial floor space would generate further traffic adding to the high volumes of traffic along Silverwater Road and Carnarvon Street which are at capacity in peak hours. The planning proposal refers to the residential development in the form of "shop top" housing; in reality the proposal is for high rise residential towers.</p> <p>The contamination assessment dated 2012 concluded that the site is suitable for on-going commercial/industrial land use only. The contamination assessment did not consider the site suitable for residential use. The contamination assessment did not include 15 and 17 Grey Street and 48 Silverwater Road which are part of the proposal. These sites may also be contaminated and not suitable for residential development. A reassessment of the contamination status for all of the site is required proving that it is suitable for residential development.</p> <p>The proposal would be contrary to the <i>A Plan for Growing Sydney</i> (NSW Government, December 2014) which does not include the residential</p>	<p>Road, compatibility with industrial uses within the B6 Enterprise Corridor zone and IN1 General Industrial zone, which generate heavy vehicles movements, noise and dust emissions.</p> <ul style="list-style-type: none"> • The report also discusses that site is not located within or near any existing centres or mass transit nodes, and implications of this. • An Independent Feasibility advice on the planning proposal provides an indicative only, minimum FSR of 2.7:1 with 178 units to enable a 4000m² retail space, to be viable. • The proposal will increase traffic generation and congestion in an existing heavily trafficked environment, particularly during peak periods. The impact of additional traffic resulting from proposed residential development on the regional road network has not been demonstrated and further modelling would be required. • The proximity and vacancy rate of the nearby neighbourhood centre west of the subject site (79-87 Beaconsfield Road, Silverwater), to the subject land is discussed in the assessment report to Council. This report also notes that demand for services in a higher order B2 Local Centre in the proposed location has not been demonstrated. • The proposal is inconsistent with State Government planning policy. The cumulative impact of similar development on the regionally significant employment lands in this location has not been tested to ascertain what the future of the surrounding B6 Enterprise Corridor and adjoining IN1 General Industrial land would be. • A contamination assessment has not been undertaken to determine the status of the additional land at 15 and 17 Grey Street and 48 Silverwater Road now included in the planning proposal. This would need to be done prior to the land being rezoned. The Contamination Assessment for the land previously included in the initial proposal indicated that the land had high levels of lead and was suitable for permissible commercial and industrial uses. A Phase 1 contamination

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	<p>portion of Silverwater as a growth centre, urban renewal area or priority precinct. Hence the proposal is contrary to NSW government policy. The Silverwater residential area is also not part of the Greater Parramatta to the Olympic Peninsula priority growth area.</p> <p>Furthermore, the proposal is contrary to the aims of the Auburn LEP 2010. There is no justification or need to allow more intense development on the land other than provided for in the existing B6 Enterprise Corridor zoning for the land.</p> <p>There is no need or justification to rezone the land.</p>	<p>assessment of the site would be required in accordance with SEPP 55 - Remediation of Land to investigate whether the land can be made suitable for residential development.</p>
12	<p>Objection to Planning Proposal</p> <p>I am opposed to this develop and my reasons are as follows:</p> <ol style="list-style-type: none"> 1. Planning proposal does not address any potential cumulative impacts if this scale of development is repeated on other sites within the locality. Given that it would be reasonable to assume that this would occur. 2. Economic Report does not address any potential cumulative impacts if this scale of development is repeated on other sites within the locality. Given that it would be reasonable to assume that this would occur. 3. Traffic Report does not address any potential cumulative impacts if this scale of development is repeated on other sites within the locality. Given that it would be reasonable to assume that this would occur. 4. Traffic/ Transport Report is unsatisfactory as it does not address the strong likelihood that residents and patrons of the development site will utilise the Stubbs Street/ Parramatta Road intersection (and intervening local residential streets) to travel west or east to avoid the congested Silverwater Road/ Parramatta Road Intersection. Accordingly, the Traffic/ Transport report is flawed in 	<ul style="list-style-type: none"> • The proposal is inconsistent with State Government planning policy for strategic (regionally significant) employment lands. • The cumulative impact of similar development on the regionally significant employment lands in this location has not been tested to ascertain what the future of the surrounding B6 Enterprise Corridor and adjoining IN1 General Industrial land would be. • Both the Economic and the Traffic and Transport Reports need to demonstrate what the potential cumulative impacts of the planning proposal might be on the adjoining and surrounding land and how such impacts might be ameliorated. • An assessment of the Stubbs St/Parramatta Road intersection is essential to providing a comprehensive picture of likely traffic impacts arising from the proposal. Parramatta Road is a major road identified in the WestConnex EIS as carrying significantly more future traffic. An evaluation of additional traffic at this intersection would enable a determination of potential impacts on both Parramatta Road and Stubbs St. The impacts on the local road intersections of Carnarvon Street/Grey Street and Grey Street/Bligh Street and safety of the intersections would also require evaluation.

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	<p>that it does not directly assess the impact of the development proposal on the Stubbs and Parramatta Road Intersection.</p> <p>5. Planning proposal does not take into account a recently completed commercial and apartments between Beaconsfield St and Asquith St approximately 2 blocks away from this proposed development which has been built to provide shops etc. on the ground floor. The Silverwater area is not large enough to warrant any further commercial development of this nature when you consider what else is available close by.</p> <p>Overall the planning proposal is considered naive and inequitable. It does not address potential accumulative effects arising from this planning proposal being repeated on other sites in the locality and is inequitable in that it proposes to absorb the identified local service retail potential on this development site alone without considering what would be the best locations in the locality to provide this service floor space and how best to fairly distribute that service floor area amongst all other similar potential redevelopment sites within the locality.</p> <p>The Silverwater area is nice mixture of residential and commercial without really high rise buildings, this development if it goes ahead would be the first in the area - please do not proceed with this develop, keep the overall feeling of the area as is.</p>	<ul style="list-style-type: none"> The proximity and vacancy rate of the nearby neighbourhood centre west of the subject site (79-87 Beaconsfield Road, Silverwater), to the subject land is discussed in the assessment report to Council. This report also notes that demand for services in a higher order B2 Local Centre in the proposed location has not been demonstrated.

Appendix 12 – Applicant’s Response to submissions and Council staff response

No	Submission	Applicant’s Response to Submission	Council Planner’s Comment on Applicant’s Response
1	<i>Support application. Local resident enthusiastic about the possibility of local / walkable additional retail uses such as a supermarket and restaurants / cafes, and the increase in local population which would make the area more "vibrant".</i>	Noted.	Noted.
2	<i>This proposal to change the current zoning from enterprise zoning to B2 for high-rise is inappropriate for the site. It will cause conflicts in the future by placing residential living among a precinct with heavy vehicles, industry and the noise or dust generated. It will create worse traffic congestion in the area which is already gridlocked during the peak periods. The site has been designated enterprise as it was deemed to be a corridor for providing employment and industry rather than retail or residential areas. This proposal would cause an undesirable shift of mixing industrial land with residential building. It is not near a railway station where high-rise units are built. The area does not have other high-rise residential buildings nearby at all.</i>	Under Auburn LEP 2010, the land surrounding the site is zoned B6 Enterprise Corridor, R3 Medium Density and R4 High Density. Despite the rezoning of the precinct and site to B6 Enterprise Corridor, no properties within the immediate context of the site have been developed in accordance with the land use zone or controls. The current zoning and planning control framework for the area will enable further medium and high density infill residential development in the area. The objectives of the current B6 Enterprise Corridor do not relate to any form of residential development. Although the site currently comprises residential buildings, the zoning does not permit development such as residential accommodation, mixed use developments or shop top housing. Given that a large portion of the development in Silverwater is residential, it is considered that the proposed zoning will be more compatible with surrounding development.	The surrounding land use for the subject site is B6 Enterprise Corridor and for adjoining land it is IN1 General Industrial. The current zoning and planning control framework for the area allows B6 Enterprise Corridor land uses on the surrounding land and not residential land uses other than under existing use rights. While existing development is generally low density with a few commercial buildings, the underlying zoning for the precinct is B6 which does not permit medium or high density residential development. A B2 zoning comprising high rise residential towers of this scale is inconsistent with the recommendation of the <i>Auburn Employment Lands Strategy 2015 (Auburn ELS 2015)</i> . The <i>Auburn ELS 2015</i> also strongly recommends avoiding the creation of land use conflict by allowing residential uses to encroach on lands

		<p>The Silverwater Road Industrial Area, located to the north of the site, on the opposite side of Carnarvon Street, is characterised by warehouses and distribution centres and light and heavy industrial developments. Heavier/traditional forms of industrial development are located further north. As such, these developments would not pose any adverse environmental impacts upon the site in a way that would compromise its capability to accommodate residential development.</p> <p>The site itself is not currently used for industrial purposes, nor has it accommodated an industrial use in the past. Adjacent industrial areas are comprised of warehouse and office spaces. As such, these developments would not pose any adverse environmental impacts upon the site. Similarly, any high density residential development on the site would not impact on the kinds of industrial development that are permitted within the IN1 General Industrial zone.</p> <p>Therefore the resultant mix of industrial land with residential buildings would not be out of keeping with the locality as surrounding development is historically residential with industrial, warehouse and commercial uses located to the north and east.</p> <p>The transport report prepared by Colston Budd Hunt and Kafes Pty Ltd has assessed the projected impact of the concept plan on the existing road network through a review of NSW Government policies and NSW Roads and Maritime Services</p>	<p>adjoining industrial development. These lands are set aside for industrial uses and allow for change over time.</p> <p>The RMS is not satisfied that the SIDRA modelling has been undertaken correctly in terms of assessing the impact of additional traffic on the regional road network and has requested additional modelling especially for the Carnarvon/Silverwater intersection. Other impacts on the local road network and the Stubbs Street/Parramatta Road intersection would also be required to confirm the impact of the proposed development.</p> <p>Council's traffic engineers indicate that the traffic signals at the Carnarvon Street/Silverwater Road will need careful consideration because Carnarvon Street experiences excessive queue lengths during peak hours. The peak hour traffic entering the intersection from the western approach of Carnarvon Street will increase by around 50%. This is not considered to be a modest increase. The queue length on Carnarvon Street (exit to Silverwater Road) will also interfere with the Grey St/Carnarvon St intersection operation which may direct the traffic locally, impacting on the</p>
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	<p>(RMS) travel access guides.</p> <p>The concept proposal would result in a total of 160 to 190 vehicles per hour (two way) during morning peak period and 510 to 540 vehicles per hour (two way) during the afternoon peak period. Silverwater Road, Carnarvon Street, Bligh Street and Grey Street would be some 20 to 125 vehicles per hour (two way) during morning peak periods and some 50 to 375 vehicles per hour (two way) during afternoon peak periods. There would also be modest impacts to the operation of intersections. The three key intersections adjacent to the site (i.e.</p> <p>Silverwater Road with Carnarvon and Bligh Streets and Grey Street with Carnarvon Street) will have a satisfactory level of service as a result of an increase in vehicle trips generated from potential redevelopment of the site. The site has access to existing bus, cycle and pedestrian linkages. Overall, the report concludes that the road network will be able to cater for the additional traffic from the proposed development and that there would be no resultant adverse impacts. The type of development and land uses envisaged for the site would not result in significant noise impacts on surrounding development. Any future development would be required to comply with the relevant Australian Standards and BCA as they relate to internal and external acoustic impacts.</p>	<p>neighbourhood.</p> <p>A percentage of traffic is likely to also avoid right turn entry into Carnarvon Street from Grey Street and exit via Carnarvon Street/Stubbs Street to Parramatta Road. This would potentially impact on the Parramatta Road/Stubbs Street Traffic lights.</p> <p>A percentage of traffic may use Bligh Street and reach Stubbs Street thus impacting on the residential areas in this vicinity. An evaluation of the impacts on the local road intersections of Carnarvon Street/Grey Street and Grey Street/Bligh Street and safety of the intersections would be required.</p> <p>The Camellia St development in Parramatta LGA proposes two river crossings over the Duck River one of which will have significant impact on the Carnarvon St and Derby St Intersection.</p> <p>Consideration of likely traffic implications arising from a combination of traffic generated by the proposed development and traffic generated by the Asquith St B1 Centre when the retail is fully operational would provide additional insight as to the local traffic situation.</p> <p>The site is 1.9 km walk from the closest</p>
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		<p>In terms of public transport, the site within an 800m catchment of a number of regular bus services connecting the site to Parramatta, Auburn Station, Macquarie Centre Bankstown and other western Sydney regional centres. There is a frequent bus service available from Carnarvon Street that connects the Auburn and Macquarie centres. The site is a 25 minute walk from Auburn Town Centre and train station.</p> <p>It is considered that public transport options are likely to improve in the future under the Department of Planning and Environment's 'A Plan for Growing Sydney'. The site forms part of Parramatta Road corridor and Investigation for Transport and Urban Renewal area. The emphasis on improving access to and within the Corridor (Public transport, vehicular, pedestrian and cycle) will encourage further public transport patronage, which will help to reduce car dependency and provide an impetus to boost development densities.</p>	<p>railway station, which entails crossing both the M4 Motorway and Parramatta Road.</p> <p>The subject site does not constitute part of the Parramatta Urban Renewal Road Corridor.</p>
3	3 <i>I feel that a much better plan for the rezoning of the Grey St block to B2</i>	Noted. However is should be considered that other areas in the precinct are currently fragmented and in multiple ownership. It is therefore not	The proposal fails to adopt a strategic planning perspective for the surrounding B6 land and erroneously nominates the site as an

	<p><i>zoning would be to rezone all the current B6 zone west of The Silverwater Rd, encompassing Beaconsfield St, Bligh St and all of Grey St.</i></p> <p><i>I own a house on Bligh St and feel it would be unfair to the rest of us to have this development right across the road without the opportunity to be involved and reap the same benefits.</i></p> <p><i>The likelihood of being able to sell under the current zoning is minimal and I will be disadvantaged and have to put up with a huge disruption as it is being built and ongoing with a much increased population and the resulting traffic and parking problems that will come with it.</i></p>	<p>reasonable to consider that they will be consolidated in a timely fashion and so are currently not appropriate for rezoning, unless the owners also collaborate to address the opportunity as a group in future.</p> <p>Concerns regarding traffic have been addressed in Section 2. The appropriate provision of off-street car parking spaces for any redevelopment proposal will be provided commensurate to the scale and density of the future redevelopment, in accordance with car parking rates specified in Auburn Development Control Plan (DCP) 2010. Any redevelopment will be assessed in future, subject to detailed design and a subsequent development application.</p> <p>The concept plans that accompany the planning proposal demonstrate the capability of the site to accommodate infill development. Further detailed design of future development of the site will be included as part of a separate DA and subject to detailed assessment by Council.</p>	<p>infill site. At a minimum it would be necessary to demonstrate how the longer term land use within the B6 land would be undertaken thereby addressing potential adverse impacts of the proposal on the surrounding B6 land.</p>
4	<p><i>I would like to, on behalf of my family, and neighbours in the area, submit this absolute rejection of the planning proposal. For the following reasons:</i></p> <p><i>(a) My family would be one of many families that will be highly disadvantaged – loss of sun during quite a considerable period of time during the day, especially during the winter, if this proposal goes ahead. Enjoying the sun is our right, and all these families rights, there is</i></p>	<p>(a) The planning proposal currently provides concept design only, to provide a representation of the type of development which may be able to be accommodated on site. The concept may be altered in accordance with any recommendation provided by Council. It should be noted that the final design of any development on the site will be in accordance with SEPP 65 Residential Flat Design Code and Auburn DCP 2010, which includes</p>	<p>The proposed development will result in significant impacts on adjoining land uses given the proposal for high rise residential towers up to 32m in height. The proposed FSR and building heights form the basis for the planning proposal and for the feasibility assessment. The proposal seeks 32m height controls. This compares to the current planning proposal for B2 in Berala which proposes 21m. This would be the highest</p>

<p><i>absolutely no reason why we should ever give up our rights, for a developer's benefit! No reason at all. So we will, in our absolute terms, reject the proposal.</i></p> <p><i>(b) Putting a high rise residential building in an industrial zone, would be extremely unfair to the local residents in general. – Normally residents living close to an industrial area would experience high amounts of busy traffic and noise during the business day and especially business hours. However, once these times are over, residents could still have some relatively quieter period, and quieter days for the families. But putting a high rise building nearby, completely removes these only little quiet enjoyments of life left for the local residents in the area. Traffic and noise generated by families living in the high rise and their visitors would be very disruptive.</i></p> <p><i>(c) It is also a huge loss of privacy, they couldn't even feel comfortable to keep windows and curtains opened, or have a family barbecue at the backyard, because all these people living on high rise could look straight through their windows, and their backyards. Having this little quiet peace of enjoyment is extremely crucial to all local families' lives, especially in an inner west neighbourhood.</i></p> <p><i>(d) Rezoning B6 to B2 this parcel of land and</i></p>	<p>relevant considerations for solar access, privacy and amenity.</p> <p>(b) This has been addressed in Section 2. Given that the zoning controls under Auburn LEP 2010 currently permit types of residential development with direct interface to industrial land, the proximity of the site to Silverdale's industrial area is not considered to be of concern. Amenity issues including layout and orientation will be addressed through detailed design. Traffic generation has also been addressed in Section 2.</p> <p>(c) The final design of any development on the site will be in accordance with the development controls for privacy contained within SEPP 65 and also Auburn DCP 2010, such as:</p> <ul style="list-style-type: none"> ▣ Buildings shall be designed to form large external courtyards with a minimum distance of 10 to 12m between opposite windows of habitable rooms ▣ Windows to living rooms and main bedrooms shall be orientated to the street and to the rear, or to the side when buildings form an 'L' or 'T' shape. Where it is impracticable to locate windows other than facing an adjoining building, the windows should be off-set to avoid a direct view of windows in adjacent buildings ▣ Site layout and building design shall ensure that windows do not provide direct and close views into windows, balconies or private open spaces of adjoining dwellings. ▣ Views onto adjoining private open space shall be obscured by: <ul style="list-style-type: none"> o Screening that has a maximum area of 25% 	<p>permitted in a B2 Zone under Auburn LEP 2010.</p> <p>This response, which presumes that similar proposals would be options for the surrounding B6 land, demonstrates the potential for cumulative impact on regionally and locally significant employment lands. Council's Auburn ELS 2015 recommends the land be retained as B6 Enterprise Corridor contrary to the suggestion that the land be used for residential development.</p> <p>In recent years, Council has approved significant developments on B6 land within the LGA (see details in the assessment report). Pressure on employment land will continue to be experienced from proposals for residential development. Reliance on Council's policies and studies including the Employment Lands Strategy which recommends B6 as the preferred use for the Silverwater precinct, and State planning policy which identifies the precinct as part of regionally significant employment land, will be important for the protection of these strategic employment lands in Auburn LGA.</p> <p>The location of the site is not considered appropriate for the towers in terms of the location of the site and its underlying strategic employments lands zoning supported by council's Employment Lands Strategy. Some</p>
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<p><i>putting a high rise residential there would definitely affect the use of the remaining B6 parcels of surrounding land, which would most likely lead to devaluation of lands of local residents' businesses. Residents at 14 Grey Street, Silverwater told me that sometimes they have to even park their car on their lawn because the street is so full that no parking is available.</i></p> <p><i>Now, can you imagine if there are extra 226 apartments – families or groups of co-habitants there, when sometimes they might need to just quickly go into their apartments so they prefer to park to their cars on street, and/or when their visitors are coming, etc. That would create a huge parking problem for the existing local residents and businesses. (g) It is definitely not an appropriate location for 5-10 floors apartment buildings, considering its proximity to the industrial area, to the jammed traffics and high level of noise, and it's very far distance to train station, shops and facilities. The area is lack of public transport facilities as well. (a local resident told me that buses stop operating there very early at nights, especially on the weekends).</i></p> <p><i>(h) Even putting our interests aside, this PP-5/2013 is still a terrible proposal. What Auburn Council really needs to be aware is that, this proposal does not mention anything</i></p>	<p>openings, shall be permanently fixed and made of durable materials; or</p> <p>o Existing dense vegetation or new planting.</p> <p>(d) As discussed in item 3 above, other areas in the precinct are currently fragmented and in multiple ownership and have not been rezoned. However, due to continued growth and urban transformation, this would be an option for the future. The potential for rezoning of other sites in the area would not result in devaluation of individual land parcels, in fact, this mixed use development will achieve a greater proportion of residential floorspace and the AEC Group's Feasibility Study commissioned by Council (dated 23 September) indicates that as such the development will be <i>generally more valuable and achieve higher sale prices on a rate per unit/site or rate per GFA</i>. In effect, this will uplift property values in the locality.</p> <p>(e) Concerns regarding increased traffic volumes have been addressed in Section 2.</p> <p>f) As discussed in Section 2, the proposed development would provide parking in accordance with the provisions of Auburn DCP 2010 and relevant RMS guidelines. In addition it should be noted that the provision of retail space including a supermarket within the proposed development, would potentially contribute to a reduction in the number of vehicle trips for</p>	<p>amount of residential development commensurate with a Neighbourhood Centre may be appropriate in the location to support a level of retail, including a supermarket. The site is however out of centre, on a busy regional road, within strategically important employment precinct that is not well served by public transport and likely to generate significant levels of traffic. A B2 Local Centre is not considered appropriate for the location.</p> <p>Council's <i>Auburn ELS 2015</i> confirms use of the land for B6 purposes with a supermarket and some additional retail. It is not identified for residential uses nor is it required under council's <i>Residential Development Strategy 2015</i> for Auburn to achieve its housing targets.</p>
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<p><i>regarding the fact that, there are 7 industrial chimneys very closed-by to the site. These industrial chimneys were not designed for anyone living at an altitude of 20-30 meters nearby. There could be a huge health concern with this proposal.</i></p> <p><i>(i) There aren't that many parcels of B6 land available, rezoning B6 to B2 is a huge waste to the Auburn community as a whole. A good parcel of B6 land homes, which are currently in B6 zone.</i></p> <p><i>(e) There have already been extremely jammed traffic conditions during the mornings and afternoons at the red light crossing at the corner of Silverwater Road and Carnarvon St, putting an extra 226 apartments there would just create an even worst nightmare for the existing local residents and local businesses.</i></p> <p><i>Please let me quantify this nightmare: heavy traffic would come from the west side of Carnarvon Street into Silverwater Road in the morning, mainly from the local businesses. It takes close to 5 minutes each time the red light turns green, and that allows approximately 10-20 vehicles to go through. I counted one time, it let only 11 vehicles to go through.</i></p> <p><i>Putting a 226 apartments building there, say every apartment has at least one car and they</i></p>	<p>customers within the primary catchment and a reduction in travel distance/time for others. This would result in a reduced need for additional car parking spaces. The retail component would also provide a significant number of off street parking. It should also be noted that the provision of residential parking permits and compliance with street parking would be the responsibility of Council and the developer would provide ample parking for residents, patrons and visitors.</p> <p>(g) These concerns have been addressed in Section 2.</p> <p>(h) Noted. However, as Silverdale is an existing residential area, it is not considered that the industrial chimneys result in any detrimental health impacts.</p> <p>(i) There is limited demand for the types of land uses envisaged under the B6 Enterprise Corridor in the Silverwater locality. By contrast, there appears to be a strong ongoing demand for multi-unit housing in Auburn LGA and the subject site (if rezoned to B2 Local Centre) will be able to make a positive contribution to both meeting the overall housing targets for Auburn LGA and increasing the supply of affordable dwellings in the short to medium term.</p> <p>The economic report prepared by Hill PDA Pty Ltd, submitted with the Planning Proposal has identified that the quantum of B6 Enterprise</p>	
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<p><i>all need to go out to M4 or Auburn direction to work in the morning, so they all have to go through the red light crossing between Carnarvon Street and Silverwater Road. Then, it would take at an extra hour or two just for the residents from this building to get through.</i></p> <p><i>Would that mean that local businesses then have to start working one hour early, and finish work one hour late? What about the existing local residents?</i></p> <p><i>Such development would affect the existing business and living condition of existing residents very badly.</i></p> <p><i>(f) There aren't that many parking lots available for the local residents and local businesses. Residents at 14 Grey Street, Silverwater [REDACTED] told me that sometimes they have to even park their car on their lawn because the street is so full that no parking is available.</i></p> <p><i>Now, can you imagine if there are extra 226 apartments – families or groups of co-habitants there, when sometimes they might need to just quickly go into their apartments so they prefer to park to their cars on street, and/or when their visitors are coming, etc. That would create a huge parking problem for the existing local residents and businesses.</i></p> <p><i>(g) It is definitely not an appropriate location for 5-10 floors apartment buildings, considering its proximity to the industrial</i></p>	<p>Corridor land, as provided for under Auburn LEP 2010, is not required. It is considered that the most appropriate land use and built form for the size of the site is a mixed use development, which would, as required, provide services to meet the daily needs of workers and residents, including retail and commercial space which would include the provision of a supermarket.</p> <p>The redevelopment opportunities will on site facilitated by this planning proposal will revitalise the immediate area, increasing the population in the Silverdale catchment and supporting investment.</p>	
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	<p>area, to the jammed traffics and high level of noise, and it's very far distance to train station, shops and facilities. The area is lack of public transport facilities as well. (a local resident told me that buses stop operating there very early at nights, especially on the weekends).</p> <p>(h) Even putting our interests aside, this PP-5/2013 is still a terrible proposal. What Auburn Council really needs to be aware is that, this proposal does not mention anything regarding the fact that, there are 7 industrial chimneys very closed-by to the site. These industrial chimneys were not designed for anyone living at an altitude of 20-30 meters nearby. There could be a huge health concern with this proposal.</p> <p>(i) There aren't that many parcels of B6 land available, rezoning B6 to B2 is a huge waste to the Auburn community as a whole. A good parcel of B6 land</p>		
5	<p>We, the citizens of the suburb of Silverwater NSW 2128 all of which are council voters, petition auburn council to reject the planning proposal affecting land at 1-17 Grey Street and 32-48 Silverwater Road Silverwater. The increase of the maximum building height of the subject land from 14m to a maximum building height ranging from 16.9 meters to</p>	<p>The West Central Subregional Strategy sets a housing capacity target for 95,000 new dwellings from 2004 to 2031. Of these additional dwellings, Auburn LGA would accommodate 17,000 additional dwellings with at least 50% of those dwellings to be located within 30 minutes by public transport to a Strategic Centre (i.e. Auburn). The remaining 50% of additional dwellings can be</p>	<p>Auburn is identified as a Town Centre under the Draft West Central Subregional Strategy and not a Strategic Centre. Council's RDS 2015 does not identify the subject site as being required in order for the housing targets to be achieved.</p> <p>Sydney Olympic Park and Newington are</p>

	<p><i>32 meters and increase the floor space ratio of the subject land from 1:1 to 1:3.75 would be overwhelming and degrading to the quiet suburban streets there is no shortage of apartments or commercial/retail in the area many surrounding developments still have apartments and commercial/retail for sale and rent.</i></p> <p><i>Importantly the proposed building height will negatively affect many homes natural sunlight essential for lighting, laundry and garden, furthermore reduced essential natural airflow will also negatively affect many homes.</i></p>	<p>accommodated through infill development. The concept proposal will assist in reaching these housing targets.</p> <p>Silverwater currently comprises an eclectic mix of residential properties of varying height, age, construction and design. There is no consistent theme or character to the local area. The future character of the site and surrounding area, under the current B6 Enterprise Corridor zoning (if development ever eventuated) would comprise a mix of commercial and modern industrial development with heights of up to 14m (equivalent to 4-5 residential storeys).</p> <p>In terms of surrounding development, there currently exists a 7 storey commercial building, multiple 4-5 storey residential flat buildings and within Sydney Olympic Park, located 1.5km from the site, buildings varying between 4-30 storeys. Within the B6 zoned land to the south of the M4 Motorway and within the 'Parramatta Road Precinct', Auburn LEP 2010 permits office, hotel and motel developments of up to 27m in height (9 storeys).</p> <p>It is considered that increasing the maximum permitted height on the site is required to facilitate the establishment of a landmark development. It is intended that the site will comprise predominantly up to 32m high buildings within the sites with Bligh Street frontage with lower buildings or set down edges to the other streets of 5-6 storeys.</p>	<p>beyond the scope of the proposal's immediate context and do not provide an appropriate comparison. Land within Silverwater is largely 2 -3 storey developments. A recent development approved just beyond the precinct on the eastern side of Silverwater Road was for a 6 storey building with an FSR of 1.96:1, ground level car parking and a number of apartments on the site. This is significantly less than the proposed residential high rise towers. The AEC feasibility analysis report (undertaken on behalf of Council) indicates that ground floor parking greatly reduces the cost of building which would attenuate the need for such high rise residential towers and be more consistent in form and scale with a B1 Neighbourhood Centre on the subject site, as recommended by Council's <i>Auburn Employment Lands Strategy 2015</i>.</p>
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		<p>The proposed increase in building height is considered appropriate in that:</p> <ul style="list-style-type: none"> ☐ It is located along a buffer strip between industrial, business and residential land along a distinctive 'gateway' route. ☐ The potential height of buildings on the site is of a scale that is compatible with the desired future character of surrounding development to the south of the site (60m), and on the opposite side of the M4 motorway which permits buildings up to 27m in height. ☐ It will provide visual interest and opportunities to enhance the existing skyline from street level. ☐ The proposed height enables the provision of generous floor to ceiling heights which will promote high levels of internal amenity. <p>The proposal will not result in any material or significant adverse environmental impacts to adjoining properties or the public domain.</p> <p>☐ The potential building forms are consistent with a number of buildings approved, built or currently under construction within the broader area including Newington and Sydney Olympic Park. Given the future vision for development in the Silverwater area the proposed increase development standard for height and FSR is considered appropriate.</p> <p>There is clearly a strong demand for multi-unit housing within Auburn LGA. The Metropolitan Development Program 2012 prepared by the Department of Planning and Infrastructure identified that in 2012, 97% of net dwelling</p>	
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		<p>completions in Auburn were in the form of multi-unit housing, particularly in buildings of four storeys or more.</p> <p>Concerns regarding transport and solar access have been addressed in section 2.</p>	
6	<p><i>I object the planning proposal PP-3/2015. Maximum height increase and FSR control have not been addressed from previous planning proposal documented in forwarding email shown below.</i></p> <p><i>I welcome the rezone proposal from B6 to B2, however oppose the maximum build height increase and FSR increase. The proposed height is with no consideration for neighbouring environment and residents. The proposed height is an invasion of privacy and will rob approximately 50% of Bligh street from solar access and dramatically reduce cooling summer breeze shown in previous shadow and wind diagrams. These facts will result in reduced solar panel effectivity increasing carbon footprint. Facts will also result with increased energy consumption and increased carbon footprint I ask council to refuse proposal for reasons stated and maintain 14 meter maximum height.</i></p>	<p>These concerns have been addressed in Section 5. The proposed development would need to be of a size that provides housing to meet population growth and at a viable rate that would underwrite the costs of developing commercial and retail premises. This is further supported by the Feasibility Study prepared on behalf of Council by AEC Group, dated 23 September 2015.</p>	<p>The provision of a supermarket and small scale additional retail commensurate with a B1 zone has been identified in the AEC report as appropriate to the west of Silverwater Road within Silverwater precinct. Being out of centre, these services are not critical. A new B1 centre has been developed within two blocks of the subject site and 27 of the retail premises remain empty. This demonstrates that supply of retail premises is currently more than adequate. Both Newington and the newly refurbished Lidcombe Power Centre on Parramatta Road, as well as the large format Costco, provide supermarket services in close proximity to the subject site. The Power Centre also includes some majors to anchor the development. The AEC feasibility analysis report (on behalf of Council) states that the proposal well exceeds what is required to enable 4000m² of retail. Further, the proposed LEP controls in the current planning proposal application allow for a development with only 2500m² of retail, so the supporting</p>

			residential could potentially be further reduced.
7	<p><i>I am against this development.</i></p> <p><i>It is too tall for the area - all other buildings in Silverwater are a maximum of three stories high so such a development will not fit into the landscape. The area is already overcrowded with more and more medium density housing being built. There are traffic and parking pressures in the streets and a new building of this size with many residents and businesses will make things much worse for the residents of Silverwater. Furthermore, such a tall structure will block morning sunlight from the houses on the west side of Grey Street, which impacts negatively on those residents' quality of life, as well as being detrimental to property values. We have sufficient business and shopping in the area with Newington being close by, and the new shopping centre at Lidcombe.</i></p> <p><i>I ask for consideration for the</i></p> <p><i>residents of Silverwater and that this development not be allowed to go ahead.</i></p>	<p>Whilst part of the site is currently occupied by detached dwellings, the site and its immediate area is now zoned to allow redevelopment for a mixture of commercial, industrial and higher density residential development. The future character of the site and surrounding area, under the current B6 Enterprise Corridor zoning will comprise a mix of commercial and modern industrial development with heights up to a maximum of 14m (equivalent of 4-5 residential storeys) with limited opportunities for any retailing and multiple dwellings and residential flat buildings of between 3 and 5 storeys on residential zoned land. The proposed zoning and envisaged built form on the site is consistent with the desired future character of the area.</p> <p>It should be noted that the proposed height of the development will not necessarily result in unacceptable solar access. In order to ensure the provision of adequate solar access to neighbouring developments, any future development will be required to respond to the design principles of SEPP 65 and the development controls contained within Auburn DCP 2010, as follows:</p> <p>D1. Solar collectors proposed as part of the new development shall have unimpeded solar access between 9:00am to 3:00pm on June 21</p> <p>Solar collectors existing on the adjoining properties shall not have their solar access impeded between</p>	<p>This response is inaccurate. The surrounding B6 zone, IN1 zone and beyond that, the R3 zone do not permit high density residential development. The future character of the area is Enterprise Corridor and employment uses (commercial and industrial type developments). It is not residential high rise development.</p> <p>No shadow diagrams have been submitted for the proposed B2 zoning and associated high rise residential towers. Previous diagrams for the same building form indicated inconsistencies with both SEPP 65 and Council's DCP in terms of solar access. Shadow diagrams would be required to facilitate adequate assessment. However, this would be undertaken at DA stage, should the proposal progress to this point.</p>

		<p>9:00am to 3:00pm on June 21</p> <p>Where adjoining properties do not have any solar collectors, a minimum of 3m² of north facing roof space of the adjoining dwelling shall retain unimpeded solar access between 9:00am to 3:00pm on 21 June.</p> <p>Note: Where the proposed development is located on an adjacent northern boundary this may not be possible.</p> <p>D2. Buildings shall be designed to ensure sunlight to at least 50% of the principal area of ground level private open space of adjoining properties for at least 3 hours between 9:00am and 3:00pm on June 21</p> <p>D3. If the principal area of ground level private open space of adjoining properties does not currently receive at least this amount of sunlight, then the new building shall not further reduce solar access</p> <p>D4. New buildings and additions shall be designed to maximise direct sunlight to north-facing living areas and all private open space areas.</p> <p>D5. North-facing windows to living areas of neighbouring dwellings shall not have sunlight reduced to less than 3 hours between 9:00am and 3:00pm on June 21 over a portion of their surface.</p> <p>D6. Where the proposed residential flat building is on an adjacent northern boundary or located within an area undergoing transition, compliance with D1, D2, D3 and D4 development controls may not be achievable.</p> <p>D7. Internal living areas and external recreation areas shall have a north orientation for the</p>	
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		majority of units in the development, where possible. D8. The western walls of the residential flat building shall be appropriately shaded.	
8	<p><i>I am against this development. It is too tall for the area- all other buildings in Silverwater are a maximum of three stories high so such a development will not fit into the landscape. The area is already overcrowded with more and more medium density housing being built. There are traffic and parking pressures in the streets and a new building of this size with many residents and businesses will make things much worse for the residents of Silverwater. Furthermore, such a tall structure will block morning sunlight from the houses on the west side of Grey Street, which impacts negatively on those residents' quality of life, as well as being detrimental to property values. We have sufficient business and shopping in the area with Newington being close by, and the new shopping centre at Lidcombe.</i></p> <p><i>I ask for consideration for the residents of Silverwater and that this development not be allowed to go ahead.</i></p>	These concerns have been addressed in Section 2.	See staff comments on section 2.

9	<p><i>I am against this development.</i></p> <p><i>It is too tall for the area- all other buildings in Silverwater are a maximum of three stories high, so such a development will not fit into the landscape.</i></p> <p><i>The area is already overcrowded with more and more medium density housing being built.</i></p> <p><i>There are already traffic and parking pressures in the streets, and a new building of this size with many residents and businesses will make things much worse for the residents of Silverwater.</i></p> <p><i>Furthermore, such a tall structure will block morning sunlight from the houses on the western side of Grey Street, which impacts negatively on those residents' quality of life, as well as being detrimental to property values.</i></p> <p><i>We have sufficient businesses and shopping outlets in the area, with Newington being close by, as well as the new shopping centre at Lidcombe.</i></p> <p><i>I ask for consideration for the residents of Silverwater, and that this development be REFUSED.</i></p>	These concerns have been addressed in Sections 2 and 5.	See staff comments on sections 2 and 5.
10	<p><i>I am writing to you again to object to the building proposal 32-48 Silverwater Rd Silverwater.</i></p> <p><i>I refer to the letter I sent you on the 16-8-2013 for the planning proposal PP-5/2013, where I</i></p>	These concerns have been addressed in Section 2. However, it should be noted that the current B6 zoning already permits traffic generating development. For example, current permitted uses would be likely to generate heavy vehicles	The planning proposal should not proceed without a review of the SIDRA modelling by the RMS to ensure acceptable levels of service especially at all relevant intersections and on

	<p><i>outlined my objections, the main objection was the lack of parking and the additional traffic this building would create, changing the zoning will not change the traffic.</i></p> <p><i>As a resident of the area, I can only see that the addition of 200 plus units and shops will only create more parking and traffic problems for the residents.</i></p>	<p>associated with the transport of bulky goods.</p>	<p>the regional and local road network. In zoning the land B6 Enterprise Corridor, under the Auburn LEP 2010, Council relied on an underpinning, robust traffic report that took into consideration the likely traffic generation associated with use of the land for uses permitted under the Enterprise Corridor Zone. This included bulky goods uses. The RMS also supported use of the land for the B6 zoning. A change to residential uses of the scale envisaged by the planning proposal would require a strategic examination of potential implications of generated traffic arising from the proposed use and future uses on surrounding and adjoining land as the land develops and as recommended by both the Gateway Determination and the RMS.</p>
11	<p><i>I object to the proposal to rezone the above land from B6 Enterprise Corridor to B2 Local Centre.</i></p> <p><i>The proposal would be a massive overdevelopment of the land resulting in a reduction in the amenity of the adjacent residential area. The proposal comprises four high density mixed use (retail, commercial and residential) towers up to 32 metres high on a podium that would be a visual blight on the area with unacceptable adverse environmental impacts.</i></p> <p><i>The existing B6 Enterprise Corridor zoning for</i></p>	<p>The planning proposal responds to the site context to provide integrated employment and housing opportunities within an existing urban context, accessible to public transport, pedestrian and cycle routes and road networks. It is not considered that the planning proposal would result in an overdevelopment of the site.</p> <p>As stated above, the Economic Report prepared by Hill PDA Pty Ltd has identified that the quantum of B6 Enterprise Corridor land as provided for under Auburn LEP 2010 was overestimated and is not required. It is considered that the most appropriate land use and built form for the size of</p>	<p>The current median unit price for Auburn ranges between \$470,000 and \$540,000. Current median rental for 1 bedroom units is \$460 per week. Most workers in retail, industrial and warehouse developments fall into the low income bracket and these prices would be out of reach for either purchase or rental when assessed against Sydney's cost of living. Under an investment property scenario, the most likely occupants of the proposed units would be people who work out of the area and therefore drive out of the area. This has implications for sustainability</p>

<p><i>the land should be retained which allows development up to 14 metres height. However there are no existing dwellings or industrial buildings in the surrounding Silverwater area higher than three stories or approximately 9 metres high. Rezoning of the land to allow higher densities, an increased floor space ratio and increased height limits would set a precedence for further high rise mixed use and residential development in the existing low rise Silverwater area. The high rise proposal would not be compatible with the surrounding residential area.</i></p> <p><i>The proposal including 250 residential units (600 residents) and 4,000m2 of retail/commercial floor space would generate further traffic adding to the high volumes of traffic along Silverwater Road and Carnarvon Street which are at capacity in peak hours. The planning proposal refers to the residential development in the form of "shop top" housing; in reality the proposal is for high rise residential towers.</i></p> <p><i>The contamination assessment dated 2012 concluded that the site is suitable for on-going commercial/industrial land use only. The contamination assessment did not consider the site suitable for residential use. The contamination assessment did not include 15 and 17 Grey Street and 48 Silverwater Road which are part of the proposal. These sites may also be contaminated and not suitable for residential development. A reassessment</i></p>	<p>the site is a mixed use development.</p> <p>It should also be noted that a number of 4-5 storey residential flat buildings have already been constructed within the Silverdale area, therefore a precedent for more intensive residential development has already been set, prior to the development of this planning proposal. Concerns regarding traffic generation have been addressed in Section 2.</p> <p>The aim of the contamination report was to determine the sites suitability for ongoing commercial land use. The report concluded that the use of the site for continued commercial use is acceptable.</p> <p>It is not considered that the planning proposal would be contrary to 'A Plan for Growing Sydney', which sets a broad target of 664,000 new homes in the Sydney region by 2031. The redevelopment of the site for predominantly high density residential has the potential to contribute to housing affordability and will also provide housing near jobs, supporting future business investment. In relation to employment, the site is not currently used for commercial/retail/industrial purposes, nor has it accommodated an industrial use in the past and does not contribute to job numbers in the subregion. Providing additional housing as part of the development of the site and up to 4000m2 of retail space will introduce an employment function of the site. Therefore it is considered that the proposed development is in accordance with the aims and objectives of 'A Plan for Growing Sydney'.</p> <p>The Planning Proposal and all relevant studies</p>	<p>criteria being met as well.</p> <p>The proposal is inconsistent with the underlying zoning and represents a significant focus on residential development rather than on employment generating uses. None of the studies recommend the form and amount of residential development proposed on the site.</p> <p>Council's <i>Auburn ELS 2015</i> and <i>RDS 2015</i> do not support the proposed increase in residential development on a site located within a B6 zone.</p> <p>The planning proposal may undermine the protection and retention of employment land uses in this locality, and may introduce pressure to rezone the rest of the surrounding and adjoining land within the Silverwater Precinct for residential purposes. The subject site is not required to meet Auburn's dwelling targets. The proposal is not considered consistent with the Plan for Growing Sydney as discussed in the main body of the report.</p>
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	<p><i>of the contamination status for all of the site is required proving that it is suitable for residential development.</i></p> <p><i>The proposal would be contrary to the A Plan for Growing Sydney (NSW Government, December 2014) which does not include the residential portion of Silverwater as a growth centre, urban renewal area or priority precinct. Hence the proposal is contrary to NSW government policy. The Silverwater residential area is also not part of the Greater Parramatta to the Olympic Peninsula priority growth area. Furthermore, the proposal is contrary to the aims of the Auburn LEP 2010. There is no justification or need to allow more intense development on the land other than provided for in the existing B6 Enterprise Corridor zoning for the land.</i></p> <p><i>There is no need nor justification to rezone the land.</i></p>	<p>prepared provide clear justification for the rezoning of this land.</p>	
12	<p><i>Roads and Maritime has reviewed the documentation submitted with the planning proposal and advises that additional information is sought from the applicant to facilitate a comprehensive assessment of the traffic impact of the proposal on the regional road network.</i></p> <p><i>In this regard, it is noted that the intersection of Silverwater Road and Carnarvon Street was</i></p>	<p>Noted. The transport report and SIDRA modelling will be updated in accordance with RMS' recommendations.</p>	<p>The final comments from the RMS recommend that a master plan be prepared for the precinct. The planning proposal should not proceed without a review of the SIDRA modelling by the RMS to ensure acceptable levels of service especially at all relevant intersections and on the regional and local road network. Council concerns about potential impacts on local roads and how traffic generated by the development would</p>

<p><i>modelled as an isolated intersection with optimum cycle time and signal phase input settings. Roads and Maritime advises that this intersection forms part of a co-ordinated and linked signal corridor along Silverwater Road with the cycle time and phasing fixed. As a result of the above, to ensure that the modelling is fit for purpose in identifying the traffic impact of the planning proposal on the existing signalised intersection of Silverwater Road and Carnarvon Street, it is recommended that the SIDRA modelling be updated and include the following inputs:</i></p> <ul style="list-style-type: none"> <i>☐ Cycle length is fixed at 130 seconds</i> <i>☐ Signal Phasing sequence should be set at A, D, E, F</i> <i>☐ Phase A has a 5 second late start and minimum green time for any phase is 8</i> <p><i>Seconds</i></p> <ul style="list-style-type: none"> <i>☐ Check priorities</i> <i>☐ Approaches on the South and East approaches should be revised. Approaches should not extend beyond the next signalised intersection.</i> <p><i>It is also recommended that site observations be undertaken to determine blockages (particularly the departures) in the peak periods and whether this needs to be accounted for in the revised modelling. It would be appreciated if the revised SIDRA modelling can be submitted in Version 6 to</i></p>		<p>fit into the regional and strategic planning including in adjoining LGAs would need to be provided to allow for detailed assessment.</p>
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	<i>ensure consistency in the output data results when reviewed by RMS.</i>		
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Appendix 13 - Preliminary submission from Roads and Maritime Services (RMS)

Trim - T098963/2015

Appendix 14 – Final Submission from RMS

Trim: 099924/2015