



13 September 2024

Stephen Barry
Planning Director
Independent Planning Commission
c/- Kendall Clydsdale

Via email: [REDACTED]

Our Ref: 9/2019/PLP
Your Ref: PP-2023-2049

Dear Stephen

REVIEW OF GATEWAY DETERMINATION – 34-46 BROOKHOLLOW AVENUE, NORWEST (9/2019/PLP)

I refer to your recent correspondence dated 9 September 2024 regarding the Gateway Review Request for the planning proposal applying to land at 34-46 Brookhollow Avenue, Norwest. Your correspondence requests comments on the anticipated number of dwellings for the 'Investigation Sites' identified within the Norwest Precinct Plan.

The Norwest Precinct Plan identifies three 'Investigation Sites' in Norwest Central, including land at 1-9 Brookhollow Avenue, 2 Century Circuit and 2-12 Inglewood Place, Norwest, as outlined in green in Figure 1 and detailed in Table 1. The planning proposal subject site is identified with a '*'.

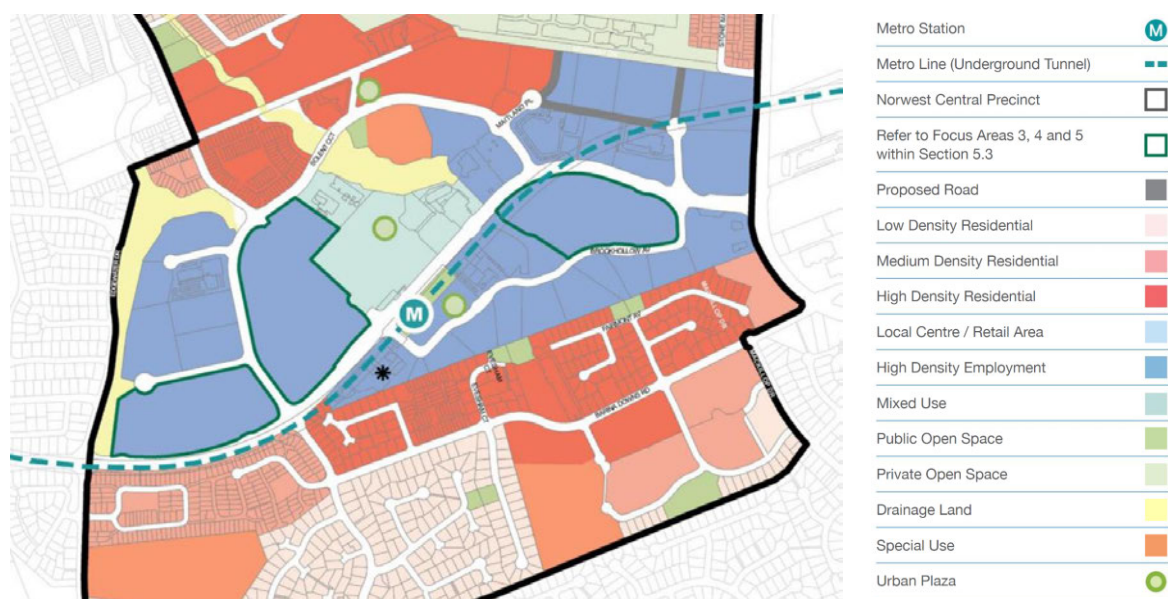


Figure 1: Norwest Central 'Investigation Sites'

Investigation Site	Site Area	Non-Residential FSR	Potential Number of Jobs	Maximum Residential FSR	Potential Number of Dwellings
1-9 Brookhollow Avenue	54,390	1.5:1	3,890	1:1	519
2 Century Circuit	81,190	1.5:1	6,089	1:1	812
2-12 Inglewood Place	51,870	1.5:1	4,079	1:1	544
Total			14,058		1,875

Table 1:
Summary of employment and residential yield
Investigation Sites and Planning Proposal site (100% uptake)

Importantly, the potential residential FSR and number of dwellings noted above are expressed as potential maximum outcomes, subject to first achieving the core employment outcomes and objectives for each site and further detailed investigations and consideration of the full range of strategic and site specific merit factors that would occur through a site-specific planning proposal in the future.

For comparison, these same metrics are provided below with respect to the subject planning proposal for land at 34-46 Brookhollow Avenue. It is noted that the site area, context and identified outcomes for the above 3 investigation sites is different to the subject site.

Investigation Site	Site Area	Non-Residential FSR	Potential Number of Jobs	Maximum Residential FSR	Potential Number of Dwellings
34-46 Brookhollow Ave	15,615	2.4:1	1,915	0.6:1	76

Table 2:
Summary of employment and residential yield
Planning Proposal site (100% uptake)

The employment potential on each of the identified Investigation Sites will be sufficient to support the strategically identified job targets for Norwest, even with the possible residential outcomes also identified for that land in the Norwest Precinct Plan.

Subject to further investigation, each Investigation Site is considered to have the potential to accommodate a limited amount of residential development to stimulate shorter term employment development opportunities in a manner that still protects employment designated land and the long-term job capacity of Norwest. The suitability of each site has been determined on merit, based on satisfying the below criteria:

- a) Located in close proximity to the Norwest Metro Station;
- b) Comprising a larger consolidated size (greater than 4 hectares) to facilitate proper master planning, optimal urban design and built form outcomes;
- c) Achieving minimum expectations around employment yield;
- d) Clear separation between land use outcomes within the broader site to minimise land use conflict and reduced desirability for commercial investment;
- e) Facilitating an appropriate interface with surrounding development and where overshadowing, amenity and privacy impacts can be minimised.

The planning proposal site does not satisfy the above criteria and was not identified as an 'Investigation Site' in the Precinct Plan. However, as detailed in the planning proposal material, the subject site does have a number of unique site characteristics which led to Council's conclusion that a limited amount of residential development (76 dwellings) can be reasonably accommodated. The planning proposal would deliver the minimum amount of employment floor space anticipated under the strategic planning framework and the inclusion of a small amount of residential would assist in overcoming site-specific built form and amenity constraints which are unique to this single site.

Both the Investigation Sites criteria and unique site characteristics of the subject site are such that the inclusion of a small amount of subservient residential land uses was considered appropriate,

however only on these 4 specific sites within the designated employment area (albeit for different reasons). These same circumstances would not be able to be replicated on any other designated employment site in Norwest. As shown within Figure 1, the size of consolidated ownership of the 3 Investigation Sites is both substantial and distinct in comparison to any other landholdings within the designated employment area. Under the Norwest Precinct Plan, residential development is not anticipated for any other designated employment site, nor was there considered to be capacity to facilitate residential development on other sites without undermining the minimum employment floor space requirements and employment objectives, resulting in inappropriate built form and land use conflicts and/or increasing the demand on regional and local infrastructure beyond their capacity.

Having regard to the above, it is critical to note that the total residential yield for the Precinct identified under the Precinct Plan does contemplate 1,875 additional dwellings on Investigation Sites as well as 76 dwellings on the subject site. The Plan sets out how this amount of residential growth, as well as other planned residential growth on other landholdings within the Norwest Precinct, can be serviced. Any further residential development within the Precinct, beyond what has been identified in the Norwest Precinct Plan, is unlikely to be able to be serviced by the necessary local and regional infrastructure including active open space and new school infrastructure (which is already an outstanding and unresolved matter). As such, the Precinct Plan (including the Investigation Sites and subject site) identifies what is considered to be the maximum amount of residential growth that could be accommodated within Norwest. Council and the State Government are highly unlikely to be able to service more than the planned residential growth for the Strategic Centre as identified under the Precinct Plan.

I trust the above satisfactorily responds to your query. Should you have any further queries or wish to discuss this matter further, please contact Gideon Tam, Senior Town Planner on [REDACTED]

Yours faithfully

[REDACTED]
Nicholas Carlton
MANAGER – FORWARD PLANNING