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27 March 2008

Our Ref: 2071094

Sydney Region South
NSW Department of Planning
Locked Bag No. 8
REDFERN NSW 2016

Dear Sir/Madam,

**RE: SUBMISSION TO THE DRAFT SOUTH SUBREGIONAL STRATEGY REGARDING THE
FORMER SUNBEAM SITE, CLEMTON PARK**

Thank you for the opportunity to comment on the Draft South Subregional Strategy. This submission has been prepared by Planning Workshop Australia, on behalf of Parkview Sydney Developments, a significant landowner within the Canterbury employment lands.

The purpose of this submission is to:

1. Highlight inconsistencies within the Draft Sub-regional Strategy with regard to the existing and future employment trends within the area;
2. Identify a more suitable future role for the subject site (Sunbeam site) within the Employment lands identified pursuant to **Table 5** of the South Subregion; and
3. Identify a more relevant "centres" classification for Clemton Park within the subregion.

LOCATION

The David's Group owns 54,846m² of land known as the Sunbeam Site, No. 60 Charlotte Street, Clemton Park (see **Figure 1**). The site is located approximately 1.5km north of the M5 motorway and 250m south of Canterbury Road which runs east-west linking the Sydney CBD with the greater western suburbs. The site is bordered by Charlotte Street to the west of the site, and Troy Lane and Sunbeam Lane to the north. Harp Street curves around to border the south west of the site.

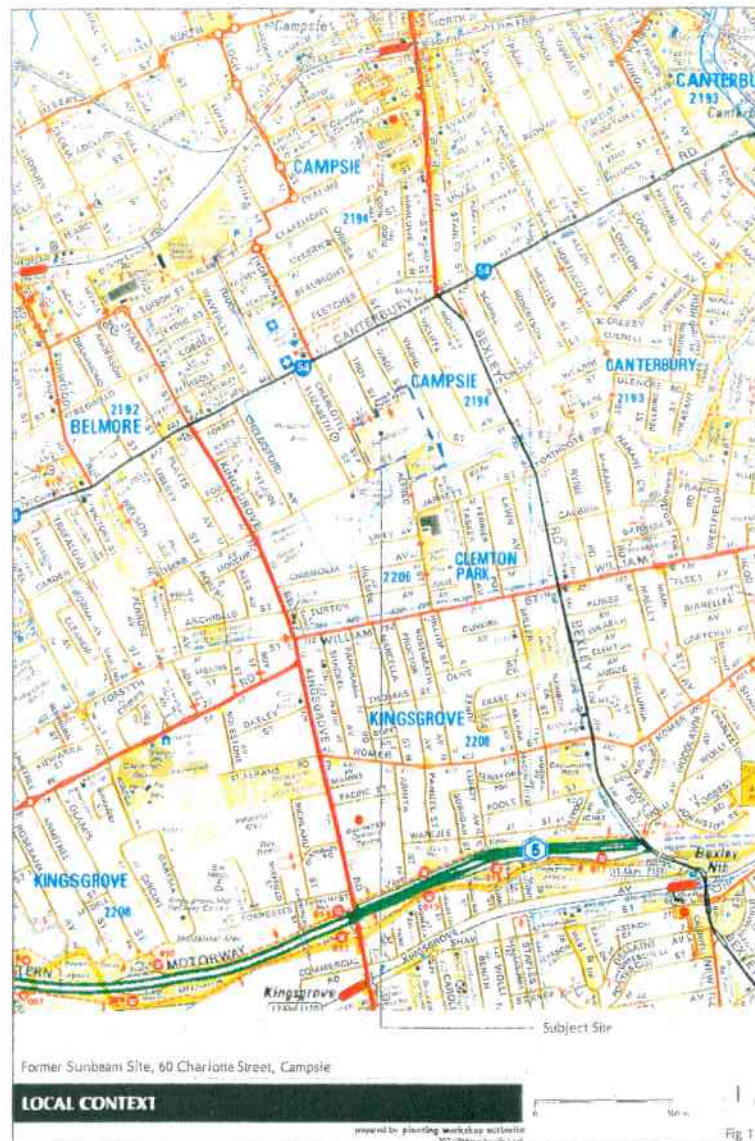
ZONING

The site is industrial in nature and so zoned Light Industrial 4(b) under the Canterbury Planning Scheme Ordinance (PSO) but is surrounded by residential development. Zone 2(a) residential "A" exists to the south, east and west; and zone 2(b) residential "B" sites are located to the north. A combination of 2(a) residential "A" and 2(b) residential "B" zoning exists east of the site. Notwithstanding the above, various industrial uses adjoin the land in the south west corner of the site, within the continuation of the 4(b) Light Industrial zoned land see **Figure 2**.

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The site is also located, within the Canterbury Road Enterprise Corridor and the M5 Economic Corridor as identified in **Figure B8** of the Sydney Metropolitan Strategy 2005. The Metropolitan Strategy identifies Canterbury Road as an important local employment focus. More specifically, the subject site is located within the Employment Lands pursuant to **Figure 3: South Subregional Structure Plan**.

Figure 1 – Local Context



The site was previously used the former Sunbeam Factory, which ceased operations on or about August 2002. The manufacturing operations of the Sunbeam Corporation (and its predecessors) took place on the site from 1954 until this date.

Figure 2 – Local Zoning



The site is currently vacant and has been for the last 6 years, save for the temporary lease of a small portion of the site by a recycling contractor. All attempts to find a permanent user for the site have been unsuccessful, resulting in an approx. 55,000m² of industrially zoned land remaining vacant, providing no permanent employment and no economic return for 6 years. Moreover, the empty and partially 'derelict' site presents as a visual detractor to development and growth in the immediate area.

DEVELOPMENT BACKGROUND

As indicated above, the owner of the subject site has been endeavouring to procure a use and user for the site since 2002.

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Having failed to so do, a request was forwarded to the Minister for Planning in October 2005 requesting that the site be developed wholly for residential development. This proposal was not pursued by the Department nor the owner.

In 2006, an application was prepared and submitted to Canterbury Council seeking to rezone the site to allow additional permissible uses within the existing light Industrial zone. The additional permissible uses sought were "bulky goods retail" and "office premises".

The application was reported to Council on 10 May 2007. (See report attached as **Appendix 1**) wherein it can be seen that the principle of the rezoning was acceptable to Council but there was some concern regarding the quantum of floorspace proposed. It was recommended that the rezoning be deferred for discussions regarding the floorspace quantum.

Notwithstanding the above, the rezoning request was withdrawn from Council by the owners and the matter progressed with a request to the Minister that the site be considered as a Concept and Project under Part 3A of the Act. (See request letter attached as **Appendix 2** dated 25 July 2007) Following discussions with the Minister and the Department, the owner received a letter accepting the development under Part 3A on 20 December 2007 (see attached as **Appendix 3**).

It is in the context of the sites physical location, its current and future zoning, its strategic location and the acceptance of a Concept and Project application under Part 3A, allowing a mix of residential and employment uses on the subject land, that this submission is made for your consideration.

1. INDUSTRIAL LAND AVAILABILITY

As a general position, the Draft Strategy does not anticipate any significant new zoning of Employment Lands within the sub-region, but rather seeks to maintain and intensify existing industrial and local service functions because, as stated by the Draft Subregional Strategy :-

"...there is little vacant land in industrial zones. An increasing population will require a relative increase in population based employment services. As residential or commercial zoned land is unlikely to be converted to industrial, intensification of existing employment zones will be necessary to accommodate this increase".

However, a property supply and demand analysis undertaken by Intelpro, on behalf of the owners of the subject site, which is attached hereto, (See **Appendix 4**) showed that at 9 November 2006, there was approximately 116,600m²GBA of vacant industrial space in the Canterbury LGA, including the former Sunbeam Site.

The South Subregion is identified to have approximately 782ha of employment zoned land, of which 173.8ha is located within the Canterbury LGA (refer to Table 6 of the Draft Sub-regional Strategy). Based on the Intelpro survey, 6.7% of the employment zoned land within the Canterbury LGA is vacant – that is 11.64ha.

In addition, the IntelPro Pty. Ltd. analysis of the industrial markets, describes Campsie (incl Clemton Park) as the suburb with the highest vacancy rate in the Canterbury Industrial precinct. The results of the survey suggest an over supply, particularly with large older style industrial buildings in the industrial market, with an estimated 15%-20% vacancy factor in the total market. The subject premises being categorised as 'Grade C', having a specific vacancy rate of 50%.

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Accordingly, the specific analysis undertaken in the LGA and subject area contradicts the stated position in the Sub-regional Strategy. Moreover, the studies undertaken by Leyhson Consulting (See **Appendix 5**) show that existing land uses within the Canterbury Road Enterprise Corridor and the M5 Economic Corridor vary significantly, with large tracts zoned industrial, commercial and residential.

Much of the existing commercial and industrial premises are dominated by automotive trades and building trades services. There are also a substantial number of vacant commercial premises and a limited number and range of retail activities.

This being the case, it would appear that the statement in the Sub-regional strategy that "...there is little vacant land in industrial zones" within area was not tested against the existing situation.

2. EMPLOYMENT USES

It is important to note that the subject site is currently vacant and has been so for approximately six (6) years, wherein there has been no (or negligible) employment from the site. Immediately prior, the site was used for manufacturing purposes by Sunbeam and employed approximately 1,000 persons. It is a generally agreed position between the Council, and the owner, that inserting another manufacturing operation into the site, having regard to its location amongst existing residential development, is extremely unlikely and undesirable.

In this respect, IntelPro Pty Limited also prepared a benchmarking study of employment levels per hectare for Industrial zoned Land in Sydney's old Central Industrial Areas (CIA) including Canterbury, South Sydney, Botany and Marrickville. A summary of the results are shown **Table 1** below:

Table 1: Employment levels

Local Government Area	Current And Potential Industrial Zoned Land	Total Likely Employment Within The Industrial Zone*	Estimated Employment Per Hectare
Marrickville	122.9	53,613	436.23
South Sydney	108.9	44,116	405.11
Canterbury	149.79	24,896	166.21
Botany	288.71	27,778	96.21

The results of this analysis, as shown above, indicate that the Canterbury LGA has a low level of employment generation per hectare of industrial zoned land, when compared to say, South Sydney and Marrickville.

In addition, Macroplan's report (see **Appendix 6**) states that *"Canterbury is characterised by very low levels of employment self sufficiency and self containment. Self sufficiency has fallen from 52.7% in 2001 to 47.8% in 2006, while self containment, as at 2001, was extremely low at 17.0% (subregional self containment 29.7%). Any new employment creation would contribute to improving these very low levels of job containment and sufficiency"*.

If therefore, the objective of the sub-regional strategy is to maintain and increase the number of jobs available to local residents, then alternate employment uses should be considered rather than those that might have traditionally been anticipated for industrial

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zones. It also needs to be considered whether there is a need to retain such zones (and uses) in an area which has demonstrably no market for them.

In considering the development potential of the subject site, alternative possible uses have been considered, notwithstanding the current Industrial zone under the Canterbury PSO.

Table 2 below indicates the maximum likely GFA for the relevant uses and indicates their approximate employment generation.

Table 2: Possible site uses within existing industrial zone

Permissible Scheme Under 4(B) Light Industrial Zoning	GFA (Sqm)	Ratio Of Employment To Floorspace (Job:Sqm)	Total Employees
Residential	Prohibited	1:1,000	0 employees
Residential care - senior living	Prohibited	1:150	0 employees
Commercial	Prohibited	1:15	0 employees
Industrial unit (max GFA)	40,000	1:70	571 employees
Industrial warehouse (max GFA)	40,000	1:200	200 employees
Trade units (max GFA)	48,000	1:50	960 employees
Hardware	Prohibited	1:55	0 employees
Retail	Prohibited	1:24	0 employees
Bulky goods	Prohibited	1:43	0 employees
Other (childcare)	Prohibited	1:34	0 employees
Shops (convenience only)	1,500	1:24	63 employees

Given the subject site, with an area of 55,000sq m (5.5ha), the highest employment generator is that of Industrial and Trade Units at 570 and 960 jobs, respectively. However, these are a maximum and assume the development of the whole site for this purpose. Such is highly unlikely to be viable given the existing 20% vacancy of such uses in the Municipality, the availability of such units in the immediate vicinity and the fact that such a maximum GFA would add some 400 additional premises into the market. It is accepted that a mix of uses within Table 2 however, could be developed.

Notwithstanding all of the above, it is noted that the Draft Sub-regional Strategy sets an employment capacity target of only 500 additional jobs until 2031 for the Canterbury LGA. In this context, the redevelopment of the former Sunbeam site (with a range of employment uses based on the Part 3A Project accepted by the Minister) seeks to retain an excess of a **1000 jobs** (See Table 3) on the site, being consistent with the Metro Strategy, the Ministers and the Council's desires for MORE jobs.

Table 3: Preferred Mixed Use Employment Zones(to amend for updated GFA)

PREFFERD PROJECT OPTION	GFA	RATIO OF EMPLOYMENT TO FLOORSACE (JOB:SQM)	TOTAL EMPLOYEES
Zone A			
Residential	6,570 sqm	1:1,000	7 employees
Zone B			
Residential	5,907 sqm	1:1,000	6 employees
Child Care	661 sqm	1:34	19 employees

Zone C			
Residential	15,317 sqm	1:1,000	15 employees
Convenience Retail	3,751 sqm	1:24	156 employees
Medical	5,287 sqm		50-200 (EFT) employees*
Zone D			
Residential senior living	18,197 sqm	1:125	146 employees
Zone E			
Trade	5,693 sqm	1:55	104 employees
Bulky goods	13,973 sqm	1:43	325 employees
Convenience Retail/shops (permitted in industrial)	1,840 sqm	1:24	77 employees
Commercial	4,686 sqm	1:15	312 employees
Gym	1,639 sqm		5-25 (EFT) employees*
Total	83,521 sqm		1,222 employees

*Note PWA estimates

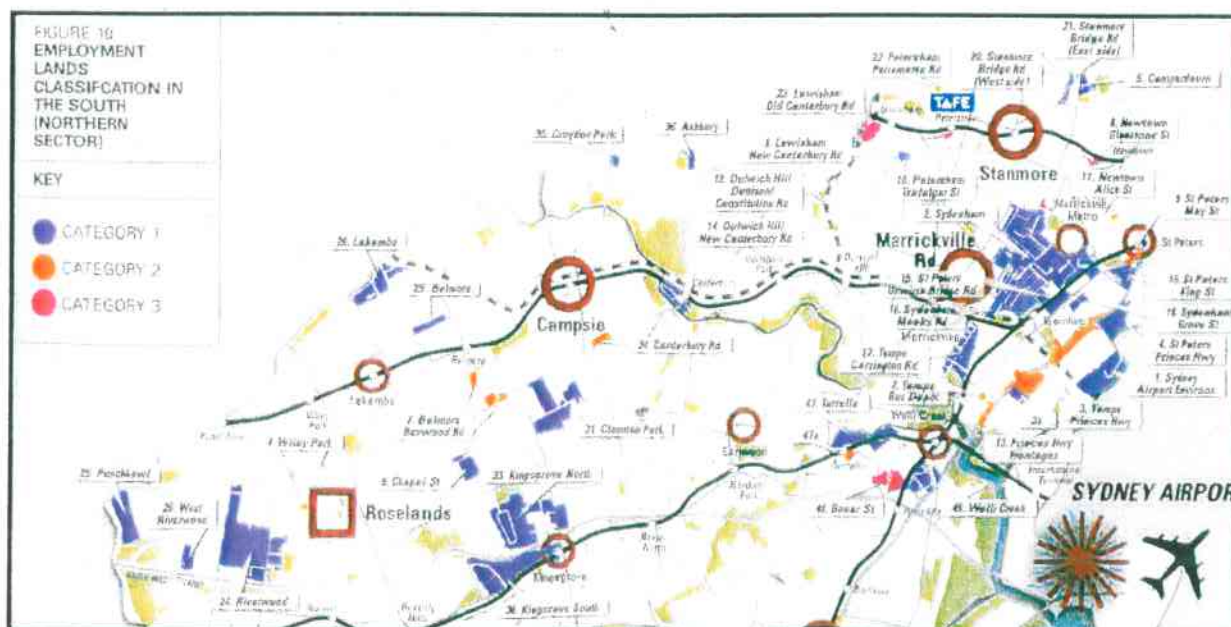
3. FUTURE ROLE OF THE SITE WITHIN THE EMPLOYMENT LANDS

Table 5 of the Draft Strategy shows a schedule of future roles for Employment Lands in the South Subregion. This schedule groups existing Employment Lands into:-

- 1) land to be retained for industrial purposes;
- 2) land with potential to allow for a wider range of employment uses; and
- 3) land that could be investigated for alternative uses".

More specifically, **Table 5** within the Draft South Subregional Strategy identifies Clenton Park (31) as 'Category 1' land "to be retained for industrial purposes due to anticipated continued strong demand for Employment Lands across the metropolitan region. The strategy suggests that the key functions of this land would be "utilities/ urban services, freight and logistics, and local industry." It specifically references the former Sunbeam site as one that should be retained as Category 1 Industrial land.

Figure 4: Employment lands Classification (Northern Sector)



The following is an extract from table 5 in the sub-regional strategy (our Table 4).

Table 4: Schedule of future role of employment lands in the South Subregion.

LGA	Employment Lands Precinct	Key Functions	HA
Category 1			
Canterbury	Clemton Park (31)	Utilities/Urban services, Freight and logistics, local industry	30
Category 2			
Marrickville	Tempe, Princes Highway	Freight and logistics, commercial, bulky goods	10
Canterbury	Wiley Park	Local industry and retail	1
	Canterbury Road	Utilities/Urban services, Local industry, retail	3
Category 3			
Rockdale	Turrella, FMR Streets Ice cream site (47a)	Former manufacturing	1.5
Marrickville	Lewisham, Old Canterbury road	Former manufacturing	5

Source: Table 5 Draft Subregional Strategy

The above table appears to be inconsistent in its approach in that it identifies specific sites, such as the FMR Ice Cream Site in Rockdale, with an area of 1.5ha as Category 3, whilst in other cases a whole precinct was categorised without having regard for particular sites within that precinct. Moreover, it is noted that the FMR Ice Cream site, and others, the former key function of which was large scale single manufacturing entities, are identified as Category 3 lands. There appears to be no basis for this allocation. If it is a function of land area and the ability to provide a contiguousness of function, it can be appreciated that the land in Clemton Park, excluding the subject site would still allow for 24.5ha of Category 1 land.

The area located to the south of Turrella Station consists of two small allotments. The western part is known as the former Ice Cream site (47a on map). The former Ice Cream site is isolated from the main Turrella industrial area, to the north, by way of the railway line and from the larger industrial area to the east by the low density residential uses. In this respect the site is bounded by residential uses to the east, south and west.

The Draft Sub-regional Strategy states that this land "... is located in a prime position to be used for a combination of employment and mixed uses and will be adequately served by existing public transport, consistent with the Chapter C, Centre and Corridors".

The Turrella Industrial (47 on map) land to the north of the railway line is identified as "Category 1 employment lands", as is the Sunbeam site. From the above it seems that the former Sunbeam site is comparable with the former Ice Cream site, being vacant and isolated from larger industrial areas by surrounding residential uses and it begs the question of why this site is categorised as Category 3 when the subject site is categorised as Category 1.

So, what would be the most appropriate categorisation of the subject land?

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In this respect it is necessary to consider the alternatives. Category 2 land is defined as:-

Category 2

"The second categorisation of Employment Lands is those which may have potential to accommodate a wider range of employment uses or more intensive scale of employment activity than currently permitted under the existing industrial zone."

Category 3 land is defined as:-

Category 3

"The third categorisation of Employment Lands is those which could be investigated for alternative uses including non-employment uses such as residential or new open or civic space."

Pursuant to **Table 7** (Centre Types and Metro Elements) of the Draft South Subregional Strategy, Employment lands are defined as:-

"Traditional industrial areas and business and technology parks for higher order employment. They are vital to supporting the economy and ability to service the city and incorporate light industries, heavy industry manufacturing, urban services, warehousing and logistics and high-tech based activities".

The size of the subject site, in single ownership, its relationship to adjoining uses, ie. lower and medium density residential and light industrial activities and its location close to strategic road corridors, as well as service facilities, like the Canterbury Hospital, render it desirable for redevelopment. However it is unlikely that the key functions identified within Category 1, such as freight and logistics or as defined pursuant to Table 7, heavy industry manufacturing, would occur on the site due to its contextual constraints.

These types of uses are associated with high frequency truck movements and associated noise intrusion which would have an adverse amenity impact on the surrounding residential areas. They are thus usually located closer to the orbital transport nodes for distribution access to their markets. Accordingly, Category 1 employment lands are sites which presently function as industrial areas and provide a regional/national economic role. The subject site no longer provides that function to the regional/national economy but rather offers a local employment area which could support a higher job density.

In addition, the categorisation of the subject site for Category 1 employment purposes does not take into account the current market demands nor the specific circumstances of the site (being vacant for some time), its location locally and its history and perhaps importantly, its future potential. The question arises whether the market is going to allow or justify the types of industrial uses specified under Category 1 employment lands within the Canterbury LGA. The studies undertaken (as mentioned above) as well as the studies by MacroPlan demonstrate the contrary (See **Appendix 6**). In this regard the MacroPlan report states that *"...industrial precincts in the inner ring suburbs will struggle to remain economically viable unless they are oriented towards higher yield activities"*.

Given the specific site circumstances and the reports attached it would seem more appropriate to identify the former Sunbeam site as **"Category 2"** or even **"Category 3"** (which is the most consistent category to the Project accepted under Part 3A by the Minister), in order to allow a more varied mix of employment uses to be incorporated within Campsie and Clemton Park, whilst assisting in the accommodation of changing employment trends.

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The flexible range of employment uses available under either Category 2 or 3 will assist in the renewal of the area through:-

- increased economic activity;
- increased employment opportunities, providing development in a location with abundant public and private transport options;
- enhancement of the viability of a currently unused site through the provision of a diverse range of development; and
- provision of the catalyst for the creation of a new "centre" for working and living.

In summary, it is considered that the "Employment Lands" (Category 1) classification of the Sunbeam site will inhibit redevelopment of the site and will compromise the achievement of the orderly and economic use of the land and the community it serves.

The Draft Subregional Strategy aims to:

- *"ensure that an adequate supply of employment land is identified within centres and other specialised employment/industrial lands to accommodate the projected new jobs capacity set by the Metropolitan Strategy".*
- *"encourage growth of employment and housing close to centres and existing infrastructure"*

It is fair to say that in some cases old industrial precincts are no longer suitable for the type of industry they were designed to accommodate and cannot easily be converted to accommodate new industrial uses. They are more appropriately developed with mixed development, which may include a component of residential.

In this respect, it is noted that Canterbury LGA is required to provide 500 additional jobs out of 29,000 additional jobs for the sub-region. It is neither viable nor appropriate to retain land within Clemton Park, specifically the Sunbeam site, for industrial uses when clearly the vacancy rates are high, the site is surrounded by residential uses and would generate more jobs by allowing a mix of employment uses. It is not suggested that the area be utilised for non-employment uses but rather incorporating a mix of uses to allow higher employment generation which is compatible with and sympathetic to existing surrounding residential uses.

4 ISSUES WITH CATEGORISATION

The description of the Employment Lands within the hierarchy in the Subregional Strategy is quite specific and consequently not all sites/lands listed necessarily fit the description. There is also concern that these imprecise descriptions may be read too literally and used to place unreasonable or unnecessary and counterproductive limitation of development in future LEP's. Therefore, if the Category 2 or 3 classifications is not accepted, it is recommended that less prescription be used in the types and sizes of uses that are nominated for each category. Also, it is recommended that a clear statement be made in all Subregional strategy documents that the employment lands category descriptions are flexible and indicative only and that LEP provisions for each site should be based on a detailed assessment of the potential of each site.

5. 'VILLAGE' CENTRE CATEGORISATION

The Metropolitan Strategy states that subregional planning will identify sites or areas which can act as catalysts or magnet infrastructure to achieve desired development outcomes within centres. The Metropolitan Strategy strengthens the concept that areas should be identified as having the potential for a wider range of employment uses. The promulgation of this is the **potential** of sites to allow for new and more flexible uses to act as the magnet for employment generation as well as the support service to the employment centres.

Although the former Sunbeam Site may currently be described as "**Employment Lands**" in the strategy, a classification of Clemton Park as a "**Village**" rather than a '**small village**' is considered to be more appropriate given the potential opportunities to redevelop this large and single ownership site in such a manner as to support the existing and surrounding mixed industrial, commercial and residential uses, acting as a catalyst for growth and revitalisation which might not otherwise be available were the site to be relegated to "more of the same" light industrial/warehouse units.

A "**Village**" pursuant to the Draft Sub-Regional Strategy is defined as:-

"A strip of shops and surrounding residential area within a 5 to 10 minute walk contains a small supermarket, hairdresser, take-away food shops. Contain between 2,100 and 5,500 dwellings".

It is anticipated that the redevelopment of the former Sunbeam site in the manner of the Part 3A project would provide for some 250-300 dwelling units, which will add to the metro targets together with the creation of a "village centre" at Clemton Park consistent with the Metro Policy. It will provide approx 1,000 jobs, convenience retail and services within a 600m radius of where people are and will be living. In addition, the project will provide for aged care facilities (both high end and independent living units) as well as medical facilities within 1km of Canterbury Hospital – uses which are currently prohibited under the Light Industrial zone and would remain so as anticipated by the Sub Regional Strategy.

Convenience retail will be provided (consistent with the desires of the existing zoning) for the existing and future residents and workforce; such facilities and ancillary services which are currently not available in the area.

In conclusion, the redevelopment of the site would provide not only employment at a rate consistent with the previous use of the site but also strengthen the concept of Clemton Park as a new local "village centre" with some 250-300 new dwellings, approximately 200 aged care beds/units with convenience retail services to satisfy existing and future demands, as well as child care facilities and public open space over and above that which might be anticipated from the current zoning. It is thus consistent with the existing land use mix and the future desires of the Metropolitan Strategy.

6. SATISFYING THE STATE GOVERNMENTS OBJECTIVES

The relevant objectives in the Draft Subregional Strategy that will be realised by redevelopment of the former Sunbeam site, as described above, include:

- "**A1.2 Plan for sufficient zoned land and infrastructure to achieve employment capacity targets in employment lands**".

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- *"A1.4 Contain the rezoning of Employment Lands to residential rezonings across Sydney"*
- *A1.9 Facilitate the use of old industrial areas."*
- *"B2.1 Plan For Housing In Centre Consistent With Their Employment Role"*
- *"B3.1 Establish a stronger centre initiative"*
- *"B4.1 Concentrate retail activity in centres, business development zones and enterprise corridors"*
- *"B7 Recognise the role of enterprise corridors as locations for local employment".*

It is considered that classifying the former Sunbeam site as Category 2 or 3 employment lands within the subregion would be consistent with the relevant objectives of the Draft Subregional Strategy as follows:-

1. At present, the estimated employment per hectare in the area is 166.21 jobs per hectare (see Report attached as **Appendix 4**).

A mix of employment uses resulting in improved employment density above that of the former use of the site, as well as the current trends within the Canterbury Local Government Area, allows the opportunity to identify the site as ***"Land with potential to allow for wider range of employment uses"*** being consistent with the objective of Subregional strategy of ***"A1.2 Plan for sufficient zoned land and infrastructure to achieve employment capacity targets in employment lands"***.

In addition, the Industrial zone including the subject site, are well serviced by infrastructure as a long established industrial area. The public transport infrastructure links the site with a significant labour force, through bus routes along Canterbury Road and Bexley Road and access to the rail network via Campsie train station.

2. The explanation accompanying the actions A1.4 and A1.9 of the Draft Strategy indicate that the facilitation of the use of old industrial areas and their supporting infrastructure for employment uses, will include the identification of options for rezonings for high employment yielding uses. The policy includes reference to the need to carefully consider rezonings of industrial lands to residential purposes which could limit the potential development of employment uses.

The subject site will not result in a loss of employment land but rather will facilitate development of additional higher employment generating uses within otherwise under-utilised light industrial lands including the provision of possible residential land consistent with ***"A1.4 Contain the rezoning of Employment Lands to residential rezonings across Sydney and A1.9 Facilitate the use of old industrial areas."***

3. As demonstrated above, the mix of employment and residential uses strengthens the employment role of the former Sunbeam site. By allowing for residential uses on the site and more specifically, aged care and thus increasing residential densities within the walking radius of supermarket, hairdresser, restaurants etc. would make these places more vibrant and provide much needed housing choice for the ageing and changing population consistent with ***"B2.1 Plan For Housing In Centre Consistent With Their Employment Role"***
4. A "Village" categorisation for Clermont Park is more appropriate given the former Sunbeam site's potential to perform the support function to the existing surrounding uses. By the provision of a mix of uses which acts as magnet infrastructure/development or

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catalyst for growth, the "Village" would achieve desired development outcomes consistent with **"B3.1 Establish a stronger centre initiative"**

5. As stated previously the former Sunbeam site is located within the Canterbury Road Enterprise Corridor. Pursuant to objective **"B4.1 Concentrate retail activity in centres, business development zones and enterprise corridors"** of the Draft Sub-regional Strategy, enterprise corridors are considered a more appropriate location for bulky goods retail land uses and small retail outlets (1,000 m² or less). Accordingly a "Category 2 or 3" categorisation would seem more appropriate and internally consistent with the Strategy.
6. The site is located within the Canterbury Road Enterprise Corridor. The Subregional Strategy explains that an enterprise corridor accommodates *"a range of local and regional services, including start-up offices, light industrial, showrooms, building supplies and retail"*.

We would agree that the area and subject site can act as a local employment area providing local services etc but the categorisation as Category 1, with these types or functions would appear to be inappropriate not only for the site and surrounding area but internally inconsistent with other sites and locations in the sub-region.

Land with the potential to allow for a wider range of employment uses will preserve local employment within close proximity to Canterbury Road whilst providing uses consistent with future enterprise corridor zones. In addition, it will improve the employment targets and targets for provision of land suitable for the development of employment generating uses. Moreover, Category 2 or 3 employment lands will protect and strengthen the concept of the M5 Economic Corridor, as well as the Canterbury Road Enterprise Corridor.

7. SUMMARY

Identifying the former Sunbeam site as **"Category 2" or "Category 3"**, which is the most consistent category having regard to the Project accepted under Part 3A by the Minister, in order to allow a more varied mix of employment uses is consistent with the objectives and initiatives for Economy and Employment as well as Centres and Corridors within the Draft South Subregional Strategy.

The site, by virtue of its size, location, characteristics and potential for redevelopment will assist in the State government's attempts to manage the shifts in industry and resultant underutilized industrial areas, by facilitating development of additional higher employment generating uses within otherwise under-utilised light industrial lands.

Moreover, by allowing a range of employment uses, including residential uses, it will ensure consistency with the metro targets together with the creation of a "village centre" consistent with the desire to provide jobs and services within a 400m radius of where people are and **will** be living. Without the catalyst of the redevelopment of the subject site it is a fair assumption that the residential quality of the area will decline as will the likely employment potential of the land.

In summary, we consider that the former Sunbeam site has been mis-designated, not only having regard to its existing employment uses but also having regard to its future potential within the Canterbury Road Enterprise Corridor. In this respect we therefore request that:-

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1. The Draft Sub-regional Strategy should acknowledge the future role of the former Sunbeam site as **Category 3** (to be consistent with the Part 3A project) employment lands within Table 5; thus identified as "***Land with potential to allow for wider range of employment uses***".
2. The Draft Sub-regional Strategy should acknowledge the future role of the former Sunbeam Site acting as a catalyst for growth within the South Subregion to support Clemton Park as a "***Village***" and not a '***Small Village***".

Should you wish to discuss any of the above do not hesitate to contact the undersigned.

Yours sincerely



SUE FRANCIS
Director
Planning Workshop Australia

APPENDIX 1

DEVELOPMENT COMMITTEE REPORT

5 60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION**FILE NO:** T-29-139**Attachment:** Correspondence from the Department of Planning**REPORT BY:** DIRECTOR CITY PLANNING**Ward:** EAST

Applicant:	Murlan Consulting Pty Ltd
Owner:	Parkview Sydney Development Pty Ltd

Summary:

- We have received a request to prepare a draft local environmental plan to facilitate redevelopment of the former Sunbeam site.
- The applicants propose to redevelop the site as an "Enterprise and Trade Centre".
- To facilitate this, the applicants are seeking to allow the retailing of bulky goods and office premises as permissible uses in the current Light Industrial zone.
- The concern is that this has the potential to turn this site into a destination retail centre of equivalent size to Roselands Shopping Centre.
- As the former Sunbeam site is very large, any redevelopment of it has the potential to impact on longer term planning for the local area.
- We need to be very careful in how we approach this so we do not lose sight of important opportunities for the future to create a skilled employment base for our area.
- It is recommended that the proposed rezoning not be supported and that further negotiations be held with a view to developing a redevelopment scheme for the site which does not rely on a retail base.

City Plan and Budget Implications:

This report has no implications for the City Plan and Budget.

Report:

We have received a proposal for the redevelopment of the former Sunbeam site in Charlotte Street, Campsie. The applicant describes the proposal as the redevelopment of the site as an "Enterprise and Trade Centre". The proposal has been submitted in the form of a rezoning application seeking to allow bulky goods retailing and office premises as permissible uses in the Light Industrial 4(b) zone.

The applicant describes the likely uses as warehousing, light industry, recreation facility, retailing of bulky goods and offices.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

The proposed uses of retailing of bulky goods and office premises are currently not permissible under the current Light Industrial 4(b) zone applying over the site. The applicants are therefore seeking preparation of an amending local environmental plan to:

- allow bulky goods retailing as a permissible use; and
 - allow office premises as a permissible use
- on the subject site.

The applicants also propose to introduce limits on the maximum floor space allowable for these additional land uses. These restrictions are proposed to be a maximum FSR of 0.85:1 for bulky goods retailing and 0.15:1 for office premises. Note that the overall maximum floor space ratio under the provisions of the Canterbury Planning Scheme is 1.5:1 for land zoned Light Industrial 4(b).

Supporting documentation

The rezoning application is accompanied by a number of supporting documents:

- A Planning Report prepared by Planning Workshop, a Town Planning Consulting firm, which sets out the proposal and summarises the additional specialist reports and information.
- Basic architectural concept drawings which illustrate the proposed building forms and layout.
- A Demolition Work Method Statement & Waste Management Plan.
- Floor space calculations for the existing buildings on the site.
- An Economic Need Assessment prepared by Leyshon Consulting.
- A Property Supply and Demand Analysis prepared by IntelPro Pty Ltd.
- A Traffic Impact Assessment prepared by Traffix (Traffic and Transport Planners).
- A Hydraulic and Stormwater Report, prepared by SRIV Engineering Pty Ltd.

This report examines only that information relevant to the question of the rezoning application, being the planning report, architectural concept drawings, economic need assessment, property supply and demand analysis and the traffic impact assessment.

The Site

The former Sunbeam site has its principal frontages to Charlotte and Harp Streets. The site has an area of some 55,000 square metres. There is a fall of up to 9 metres across the site from north to south. This equates to a slope of approximately 1 in 32 or 3%.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)



Bulk and Scale

The applicants are proposing a centre which will contain some 70,000 square metres of floor space. It should be noted that the maximum permissible floor space under current floor space ratio controls for the site is approximately 85,000 m².

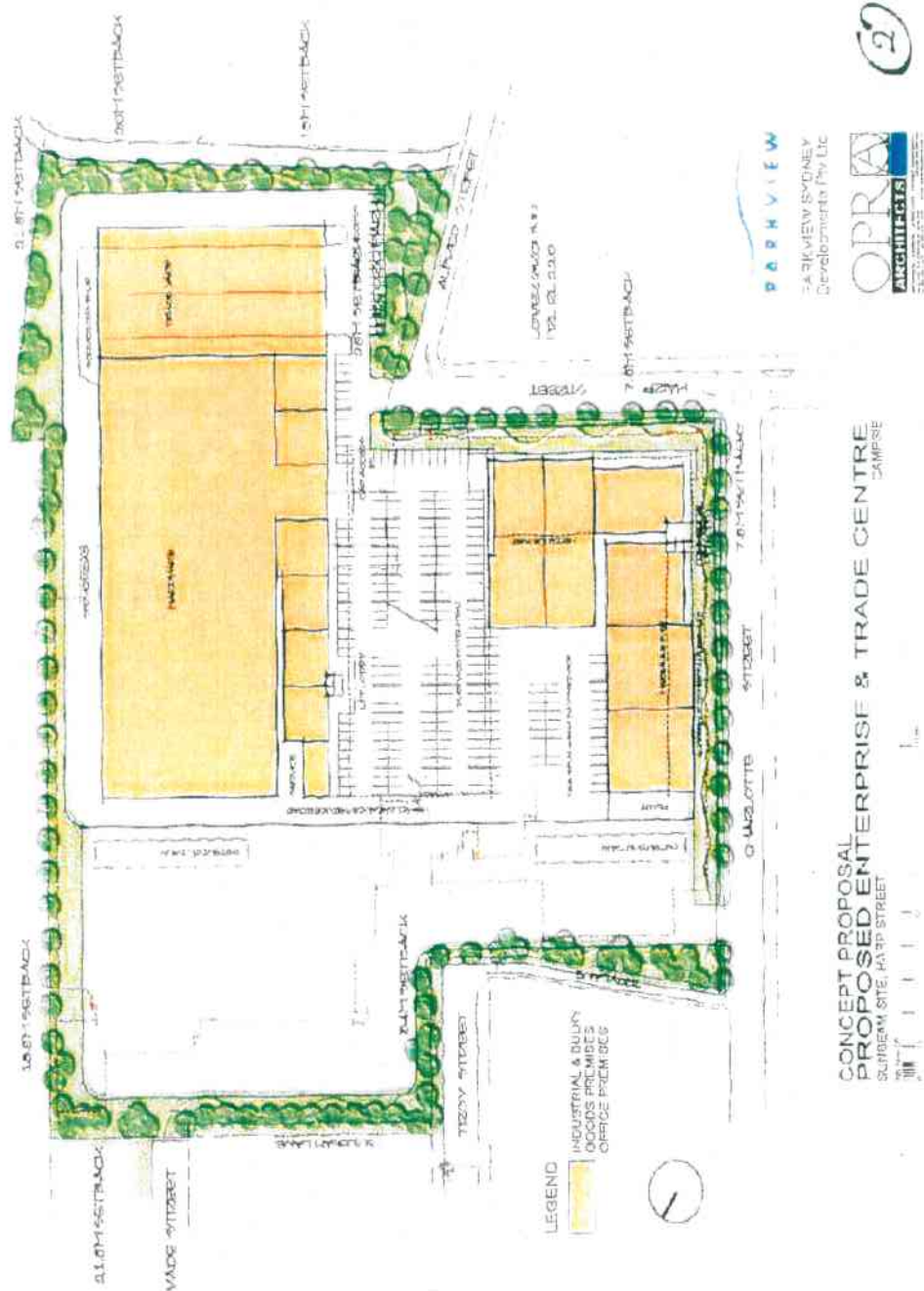
The proposed development is to be accommodated in what is essentially two buildings. Heights will vary across the site, up to six levels. The two buildings are separated by an internal parking station of four and five levels.

Should the Committee wish to pursue support for the current proposal or a variant of it, there are considerable amenity based issues which would need to be addressed in detail. As this report does not support the principle of the currently submitted proposal, this detailed analysis has not been carried out. These issues relate, but are not necessarily limited, to:

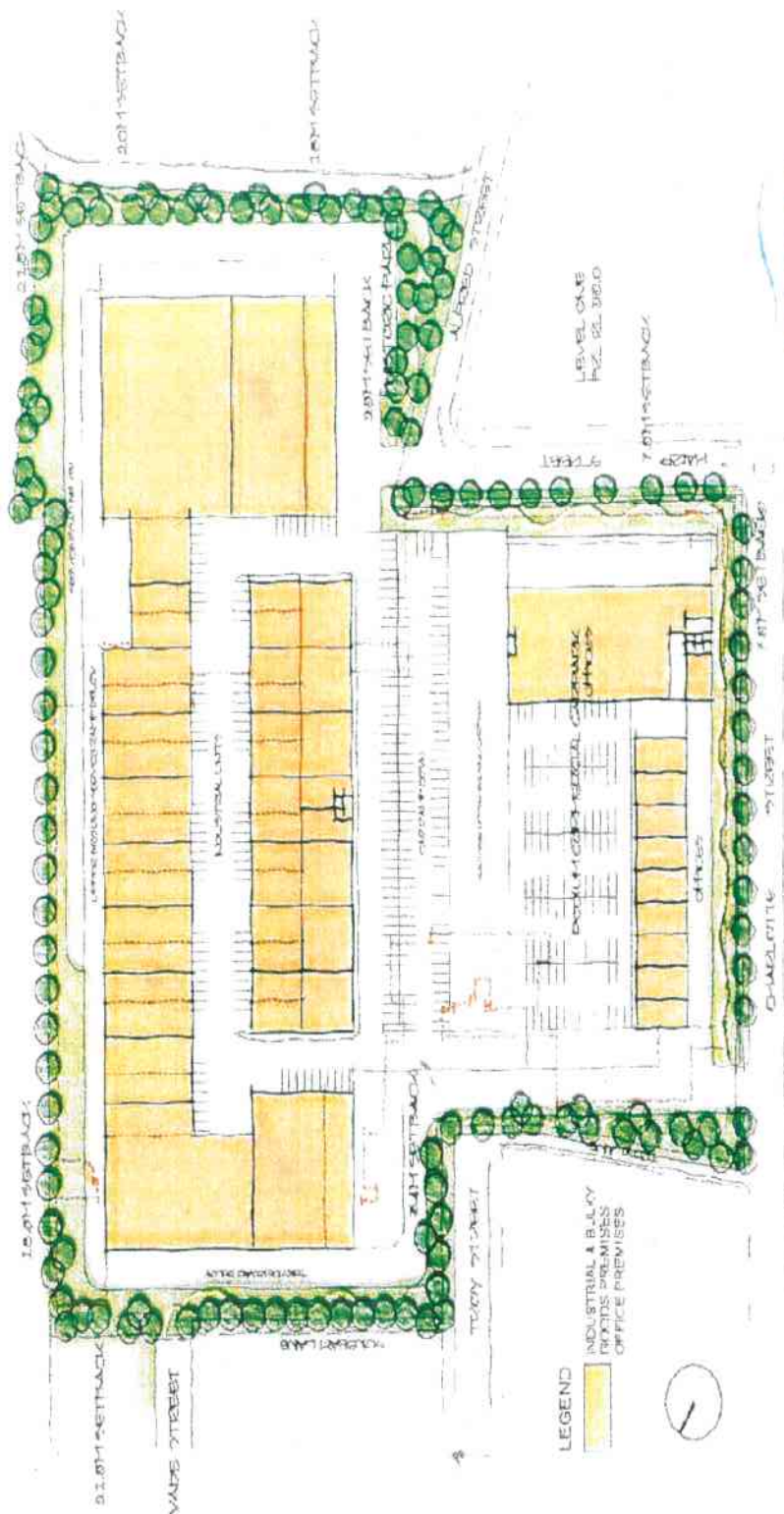
- Building heights.
- Setbacks from residential property boundaries.
- Overshadowing.
- Building bulk and large expanses of building walls directly facing residential properties.
- Access to the site and internal vehicle circulation. In particular proposed internal roads for deliveries, service and product pick-up which in part run adjacent to adjoining residential properties.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

At this time, we only have sketch illustrations of what is being proposed for the site. Some of these are included below so that the Committee can get an idea of the scale and intensity of development proposed. We requested the applicant to provide more detailed plans of their intentions for the site so that we would have a much clearer picture of the extent of proposals for this site. The applicant has been reluctant to provide any further detail.



60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)



60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.) Council) and the community can have a clear picture of what is being proposed for a particular site. Should the Committee ultimately be of the view that the current proposal is worthy of pursuing further, then it is strongly recommended that Council require more detailed plans before any formal resolution to prepare a draft LEP is made. This will allow us the opportunity to provide a more rigorous appraisal of the actual proposal and its potential impacts, particularly those on the adjoining residential properties.

Land Uses

It is still somewhat unclear as to exactly what types of land uses are proposed for this new centre particularly the bulky goods component. The applicant's supporting documentation gives varying indications of the likely breakdown of floor space components. The following breakdown appears to be the most likely:

- Offices 6,500 m²
- Light industrial 18,500 m²
- Bulky goods (retail & trade) 45,000 m²

Generally "trade" bulky goods would be seen as such things as plumbing/electrical supplies, glass, tiles etc for tradespeople and are generally relatively low traffic generating mainly during the week.

Then there is the bulky goods retailing/homemaking type operation, usually comprising, furniture (Freedom Furniture, Fantastic Furniture), electrical (Bing Lee, Harvey Norman, Retravision and The Good Guys), electronics (Dick Smith), bedding (Sleep City and Forty Winks) and carpet and flooring, leisure (BBQ's Galore), not to mention retail hardware stores such as Bunnings and Mitre 10, for the general public which generates high volume weekend traffic with a more shopping atmosphere and feel.

Both of these types of uses have a purpose and serve the community but have different impacts in terms of traffic and amenity, the latter being more in the category of a retail shopping use the former a supplier to the industry.

If it is considered important that this distinction be drawn then in deciding how these can be controlled in real and practical terms is an issue which needs to be addressed. In this case the applicant has put forward a concept but mixed the two uses. It is likely that if both these uses are made permissible that the bulky goods retail shopping type use will take over as the highest value use. The applicant's figure for demand relates mainly to the "Bulky Goods Retail Uses" not the strictly trade suppliers.

Under the applicant's submission it is very difficult to distinguish what the actual difference between "trade" and "retail" bulky goods is. The supporting documentation provided, including sub-consultant reports, only reinforces this difficulty as some documentation refers to an under provision of retail bulky goods in the area while others refer to the centre being "trade" based and not the same as a traditional retail based centre. We can really then only rely on the fact that the applicants are proposing to allow retailing of bulky goods up to a maximum of 45,000 m² and we need to be prepared that this is potentially what we can expect to occur if the proposed rezoning proceeds.

The applicants have given some indication of their intention regarding likely future tenants. These include a hardware store/trade yard, at least one "major" tenant, at least two "mini major" tenants and a number of "trade/bulky goods/showroom units". These

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)
units appear to be in an enclosed mall type arrangement, as in a retail "Supacentre". An additional level contains a number of "industrial units".

Despite what is continually referred to in the supporting documentation as trade orientated bulky goods retail, it is clear from the specialist sub-consultants reports that continual references along the lines of "the surrounding region is significantly under-provisioned as far as bulky goods retail floor space is concerned" can only lead to the conclusion that what is being proposed for this site is in reality a destination retail facility.

Economic Issues

The Economic Need Assessment submitted by the applicant indicates that there is a latent demand for bulky goods retailing in the local area. The report suggests that within the local catchment area there is an estimated available expenditure of approx \$813 million for bulky goods. As there is no bulky goods type retail facility in this local catchment area, then the assumption is that this expenditure is leaking out of the local area. This available spending has been equated to a demand for some 200,000 square metres of floor space. The argument continues that the proposed 45,000 square metres of bulky goods floor space equates to only 22% of the potential latent demand for bulky goods retail floor space. It is accepted that this is a normal marketing analysis methodology/tool.

We have not tested these assumptions. This amount of new floor space will have an impact but the extent of the significance of that impact is difficult to ascertain. This is compounded by the fact that the future of our Canterbury Road Masterplan remains unresolved at this stage. Also, our proposed Economic Development and Employment Strategy (discussed in more detail later in this report) will have an influence and must be factored into these considerations.

As both of these currently remain unresolved it is not possible to comment on the potential impact a centre of the type and size proposed will have.

There is also an argument that the proposed development in itself will be an employment generator. While this will be true up to a point, the employment directly generated will largely be at lower skill levels. If we can facilitate redevelopment of this site as a real business innovator and take advantage of emerging employment and business trends, we can turn this employment generation into jobs with higher skill sets and broaden the range of our employment base for our community. We should not lose sight of this objective or the growing opportunities that are likely to be available as our redundant industrial uses are going through this change period.

Traffic/Transport Implications

The Traffic Impact assessment highlights the difficulties with the distinction between "retail" and "trade" bulky goods. This report states that the proposed centre is to operate substantially as a trade centre for the building industry and not as a "normal" public bulky goods use, which has different characteristics in terms of its traffic generation. This report refers to 35,000 m² (of the potentially available 45,000 m²) of floor space being exclusively for trade purposes. How this can be ensured has not been made sufficiently clear by the applicant.

The Traffic Impact Assessment suggests that the local street system is capable of absorbing the likely forecast increases in traffic that would result from the proposed development. However, the figures quoted indicate increases in traffic ranging from 30%

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

to 56%, which are significant increases over current levels. Should the Committee be supportive of the current proposals for this site it is likely that traffic will be a significant factor affecting the views of the community. The other worrying aspect of this is that the traffic impact assessment appears to be based on a trade centre for the building industry, not a "normal" public bulky goods retailing use which the rezoning would allow. As the traffic consultants have indicated that these two types of centres have different characteristics in terms of traffic generation, this worry increases as their figures and conclusions appear to be based on the lesser (in terms of traffic generation potential) of the two.

The potential traffic implications of a retail based centre need to be carefully considered, in particular the impacts of weekend trading and the amounts of traffic that will potentially be using the local road network to access and leave the site.

Ongoing Management and Control

Despite all that might be said about this being a trade based centre, the fact remains that once planning controls have been amended to permit retail based activities, then we need to be prepared to receive development applications for such activities. Before we consider permitting retail based activities on this site we need to be satisfied that satisfactory arrangements are in place to control these uses. At this point in time we are not satisfied that suitable safeguards are either in place or proposed to be put in place. It is being suggested that limits be placed on the amount of floor space in each of the broad lands use categories proposed. These are:

- Bulky goods retail 0.85:1
- Office premises 0.15:1

The remaining floor space capacity would then theoretically be taken up by uses currently permissible in the Light Industrial 4(b) zone.

This alone is not considered to be a satisfactory mechanism to safeguard the ongoing management and control of land use on this site. Firstly, the amount of floor space available for bulky goods retail is in my view excessive and reinforces my concerns about this site developing as a car based destination retail facility. Secondly, the use of a development standard such as this could lead to future pressure for it to be relaxed by an objection lodged under SEPP 1.

It also does not provide us with a mechanism to distinguish between "trade" and "retail" bulky goods. If trade based bulky goods proves not to be a viable proposition then we are likely to be receiving applications for general retail based bulky goods (electrical discounters, furniture stores, etc) and be faced with this centre becoming a car based destination retail facility.

As indicated, it is very difficult to distinguish between "trade" and "retail" based bulky goods and we would find it very difficult to develop and rely on planning provisions to control this from a defensible position.

Site Inspection to Similar Types of Centres

The applicants have identified other enterprise and trade type centres as examples of the type of facility they are promoting for this site. We have taken the opportunity to visit two of these centres (at Artarmon and at Chatswood) and generally speaking, these centres

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)
 were found to be generally acceptable and suitable for the former Sunbeam site.
 Photographs of these facilities have been included below for the Committee's information.



60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

Both of these centres are obviously geared to trade/enterprise activities and these types of operation, with the exception of the Good Guys discount electrical retailer, are more than suitable for the former Sunbeam site. The majority of these types of land uses would also be permissible under the current zoning of the former Sunbeam site. The major reservation remains the question of retail based activities. As one of the photos above shows, one of these centres contains a Good Guys discount retail store. The potential for up to 45,000m² of floor space of this type of retail land use is not what we would consider as being suitable for the former Sunbeam site.

Department of Planning Views

On a number of occasions we have discussed the future of this site with senior representatives from the Department of Planning regarding their views on the site and how the variously proposed schemes relate to the Department's responsibilities from a regional planning perspective. These discussions go back as far as when the applicants were initially suggesting residential redevelopment schemes for this site.

The Department's view has consistently been one of a desire to maintain the employment/industrial base of land use for this site and not to turn it into a free standing retail centre. This position is consistent with Government policy. We have correspondence from the Department which raises concerns with proposals for this site and states, in part,

".....the Department..... is particularly concerned about the cumulative impact of rezoning industrial lands within Sydney.....These concerns relate to the potential impact on the ongoing viability of industrial areas and the loss of opportunities for new industrial development."

and

".....the Department is concerned about the impact of the proposed development on existing centres and the Canterbury Road corridor, which is identified as a potential enterprise corridor in the Metropolitan Strategy, and the potential for the development to become a retail destination rather than providing employment land for more industrial type uses."

Copies of this correspondence are included in the [Attachments](#).

At the end of the day, any support for this particular proposal, or any other for that matter, which translates into a draft LEP will need to go before the Department's LEP panel with a sufficiently rigorous argument supporting and justifying preparation of the LEP. A draft LEP cannot be publicly exhibited without the express approval of the Department. The correspondence from the Department gives us an early indication of their views.

Ultimately, the Department's LEP template will also have an impact on this site as well as on industrial lands generally. In this regard, the template's Business Park zone would appear at this stage to offer a satisfactory replacement zone.

This type of zone is one we will be needing to consider as work progresses on our comprehensive City wide LEP not only for this site but for other industrial areas where the current building stock have reached the end of its economic life and is likely to redevelop in the not too distant future. The Harp Street area is an example of this.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

Canterbury Industrial Lands Study

Our Industrial Lands study, completed in 2004, makes the following recommendations as far as the former Sunbeam site is concerned.

"The former Sunbeam site should be retained for light industrial activities consistent with its current zoning.....Notwithstanding the site's potential significance.....it is a strategically valuable light industrial site and redevelopment for light industrial uses should be encouraged and facilitated."

This recommendation has previously been endorsed by Council. While this recommendation is based on maintaining a more traditional industrial land use zone, the principle of retaining this site (and precinct) as an employment/business generator remains.

Proposed Economic Development and Employment Strategy

Under our Economic Development program we are about to engage consultants to prepare an Economic Development and Employment Strategy. Funding from the Department of Planning has been received for both this project and a regional study involving Hurstville and Sutherland Councils.

This Strategy will form a foundation for the future of economic development and employment within our City. A report on this matter was presented to the Council meeting on 26 April 2007 and extracts from it are reproduced below for the Committee's information.

A liveable city seeks to improve the quality of the local economy and access to local jobs for residents, encouraging sustainable development which takes advantage of Canterbury's strategic location within Sydney. There has been a nationwide trend to convert employment lands to alternative uses such as residential housing, due to the high demand for housing and the strong financial returns from residential development. The loss of strategic employment lands can be detrimental by reducing the competitiveness of an area and removing future opportunities for businesses to locate close to major transport routes, infrastructure and labour sources. In addition, the loss of employment lands increases costs for local residents as they travel longer distances to find work.

The preservation of existing employment lands, as well as the creation of new employment levels, is a metropolitan wide issue the Metropolitan Strategy seeks to address. In the broadest sense "employment lands" refers to those places where people work. Generally this has referred to traditional industrial lands which may host light industry, manufacturing, wholesaling, transport or storage industries as well as business parks.

Canterbury City is highly constrained with relatively little undeveloped land and therefore conversion of some land previously used for industrial uses such as manufacturing to other employment uses such as business/office parks is vital.

We have recently undertaken an Industrial Lands Study, a major study of Canterbury Road, created a Masterplan for Canterbury Town Centre and are currently undertaking the Canterbury Town Centres Study. It is anticipated that all of this work will contribute to this Employment and Economic Development Strategy.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

The Strategy will explore and recommend future economic development and employment generation strategies in order to create sustainable local employment for the residents of the City of Canterbury.

The strategy will:

- evaluate current employment lands within the City and recommend strategies to preserve them, paying particular attention to key sites;
- develop planning controls to quarantine existing land for employment as required;
- investigate opportunities and recommend strategies to increase or enhance employment lands;
- project future demand within the City based on population growth and trends;
- develop a comprehensive plan to attract new businesses to our area and to encourage expansion in existing businesses;
- investigate specific industries most suitable to Canterbury and recommend a range of strategies to attract these industries to Canterbury.

We can see that the nature of industrial zones and their role is changing. Traditionally industrial zones were used for just that, industry. Industry was a significant employer of people. This is not the case so much these days. Industry has been going through significant change.

This is reflected partially through references to industrial lands changing to references to employment lands. So therefore the use of the land, or its terminology, changes but its role does not. It remains focussed on employment. We need to respond to this and move forward with these changes. The Economic Development and Employment Strategy will lay the foundation for this.

Conclusion

There are concerns with both the size of the proposed facility and the land uses envisaged for it. As far we can see, what is being proposed here is a Supacentre type retail facility. It will be equivalent in size to Roselands Shopping Centre.

While we are only considering whether or not to prepare a LEP for the proposed rezoning, we need to be careful of the implications of any decision to support the planning changes proposed. Once the planning controls have been amended, we lose the level of control we currently have. Despite possibly the best of intentions of the applicant that may be stated about future land use mix, time and circumstances can see, in practical "on the ground" terms, those intentions eroded. There are no longer term management strategies proposed to continue land use control and the relatively broad nature of land use permissibility requested means that we could be on the receiving end of development applications for 45,000m² of bulky goods retail floorspace. Those applications would have rights of appeal against any Council decisions.

It is difficult to be precise when trying to identify exactly what breakdowns of floor space are proposed. At best the difference between "trade" and "retail" bulky goods is clouded and given a maximum floor space ratio of 0.85:1 for bulky goods is proposed, we must be prepared for the scenario that this potential capacity could be taken up by retail bulky goods type land uses whether now or at any time in the future.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

We should be looking for what will be the best solution for this site and the context in which it sits within our City and it is not considered that a retail centre is such a solution.

Bulky goods retailing is a problematic issue. There is an obvious demand for it across the metropolitan area and it serves a useful function. However these types of centres are becoming increasingly larger and with that comes increased traffic, amenity and impact issues. The middle of a low density residential area is not what we consider an optimum location for such a centre.

As stated earlier, despite what is continually referred to in the supporting documentation as trade orientated bulky goods retail, it is clear from the specialist sub-consultants reports that continual references along the lines of "the surrounding region is significantly under-provisioned as far as bulky goods retail floor space is concerned" can only lead to the conclusion that what is being proposed for this site is in reality a destination retail facility. Relatively minor components of industrial and commercial floor space, amounting to only 35% of the total floor space proposed (30% of the total capacity of the site) do not alter this conclusion.

A car based destination retail facility on this site is not the best solution for this site. Traffic, noise, building bulk and scale are likely to be an issue with surrounding residents. Extensive retail land uses are likely to impact on existing retail zones and could jeopardise current programs involving Canterbury Road.

Ideally it is preferred not to be considering a site specific rezoning proposal for this site at this point in time. Council will be making some important strategic land use decisions in the short to medium term with the upcoming Economic Development Strategy (about to commence) and how these results will feed into our comprehensive LEP and the standard LEP template.

However the owner/applicant has held the site for a number of years and there is a need to progress the matter. We do have a proposal before us and it is therefore important that we take a proactive stance and provide a positive direction for this site and for the applicants.

This is an important strategic site. As our industrial areas transform from the more traditional manufacturing base and encompass business parks, clean industry and technology based employment generators, with the subsequent rise in the skill sets of those directly and indirectly employed, we need to be at the forefront of that change process and not just playing catch up. By doing this we can help to actually facilitate the change process. The proposed Economic Development and Employment Strategy will be a key factor in initiating this and our comprehensive LEP for the City (due to be completed by 2011) will establish the planning framework. We need to be sure that the short term answer for this particular site does not compromise or conflict with the opportunities being presented.

It is therefore considered amenable to pursue with the applicant alternate strategies for this site which, while maintaining an emphasis on providing employment and business opportunities, does not involve turning this site into a car based retail centre. Because of the significance of this site, we, together with the Department of Planning should be actively working with the applicant to pursue the achievement of our common objective of obtaining a positive outcome on this site.

60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE): REZONING APPLICATION (CONT.)

RECOMMENDATION:

THAT:

1. The request for rezoning to permit bulky goods retailing on the former Sunbeam site be **REFUSED**.
2. The applicant be advised that Council is looking for innovative solutions to questions of industrial and employment change and would encourage a scheme which seeks to promote and facilitate an alternate redevelopment scheme for the site that:
 - focuses on retaining light industrial, employment and business park type activities,
 - promotes employment which raises the skill levels of our employment base,
 - takes advantage of the locational characteristics of the site such as the proximity of the M5;
 - has minimal reliance on retail based land uses as the dominant component.
3. The applicant be further advised that Council would like to actively work with the Department of Planning and them to achieve an outcome on this site in line with the principles set out in recommendation 2 above.

43. If you are not satisfied with this determination, you may:
- 43.1. Apply for a review of a determination under Section 82A of the Environmental Planning and Assessment Act 1979. A request for review must be made within 12 months of the date of this Notice of Determination and be accompanied by the relevant fee; or
 - 43.2. Appeal to the Land and Environment Court within 12 months after the date on which you receive this Notice of Determination, under Section 97 of the Environmental Planning and Assessment Act 1979.
(Section 97 of the Environmental Planning and Assessment Act 1979 does not apply to the determination of a development application for State significant development or local designated development that has been the subject of a Commission of Inquiry.)

If you need more information, please contact Paula Bizimis in City Planning on 9789-9351 between 9.00 a.m. and 11.00 a.m., Monday to Friday.

5 **60 CHARLOTTE STREET, CAMPSIE (FORMER SUNBEAM SITE):
REZONING APPLICATION**
FILE NO: T-29-139

Min. No. 125 RESOLVED (Councillors Robson/Furolo)

THAT the rezoning application be deferred as requested by the applicant, to allow further discussions to occur.

6 **REPORT OF THE INDEPENDENT HEARING AND ASSESSMENT PANEL**
FILE NO: D-6-9 PT5

Min. No. 126 RESOLVED (Councillors Robson/Furolo)

THAT the report be noted.

7 **88 SPROULE STREET, LAKEMBA: DEMOLITION OF STRUCTURES,
CONSTRUCTION OF TWO STOREY BOARDING HOUSE WITH
BASEMENT AREA AND ASSOCIATED PARKING**
FILE NO: 822/88D PTS 1 & 2

Min. No. 127 RESOLVED (Councillors Furolo/Robson)

THAT Development Application DA-919/2005 be **APPROVED** subject to the following conditions:

PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE

1. The following must be submitted to either Council or an Accredited Certifier prior to the issuing of a Construction Certificate:
 - 1.1. Details of:
 - Protection from Termites
 - Structural Engineering Plan
 - Building Specifications
 - Fire Safety Schedule (listing all measures to be included in the building)

APPENDIX 2

**PART 3A REQUEST LETTER
DATED 25 JULY 2007**

Chairman: Professor Sonja Lyneham BA MTCP FPIA Adjunct Prof FBE (UNSW)
Directors: Charles Hill MBA Dip TCP FPIA; Garry Fielding BA Dip URP Dip LCM FPIA;
David Ryan BTP (Hons) Dip Law Grad Dip Leg Prac MPIA; Sue Francis Dip Env Plng (UK) PDP Env Plng (UK) MPIA MRTPI;
Senior Associate: Rob Power Dip Law MPIA

25 July 2007

Reference: 2071094

Mr. Frank Sartor, MP
Minister for Planning
Department of Planning
23-33 Bridge Street
Sydney 2001

Dear Sir,

**RE: MAJOR RESIDENTIAL, COMMERCIAL AND RETAIL PROJECT AT
CHARLOTTE STREET, CAMPSIE**

I refer to the recent discussions held between yourself and Parkview regarding the above mentioned site. Subsequently Planning Workshop Australia, on behalf of Parkview has been requested to prepare a preliminary project outline in relation to land (the subject site) at Charlotte Street, Campsie (see **Figure 1**).

In this respect:

- a) The proponents request that the Minister consider the site to be a **Group 5 Residential, commercial or retail project** under Clause 13 of Schedule 1 of the *State Environmental Planning Policy (Major Projects) 2005*.
- b) The proponents request that the Minister authorise the preparation of a 'Concept Plan' for the 'project'.
- c) Contingent upon a & b, a proposal will be lodged as a **Part 3A** Concept Plan Application (**the Application**) and a Project Application which would comprise the following:
 - i. the 'subdivision', 'use' and 'development' of land;
 - ii. associated roadworks, ancillary infrastructure and environmental measures;
 - iii. Project application Stage 1 (employment zone); and
 - iv. Project application Stage 2 (residential component).
- d) A 'Statement of Commitments' will be prepared to accompany the Application and will form the basis of a Draft Planning Agreement (**the Agreement**).
- e) The Minister, in granting the approval under **S75O**, may determine under **S75P(1)(a)**, that further applications, assessments and approvals are required in relation to each stage and aspect of the concept plan except for stages 1 & 2 (i.e. the employment zone and the first residential component).

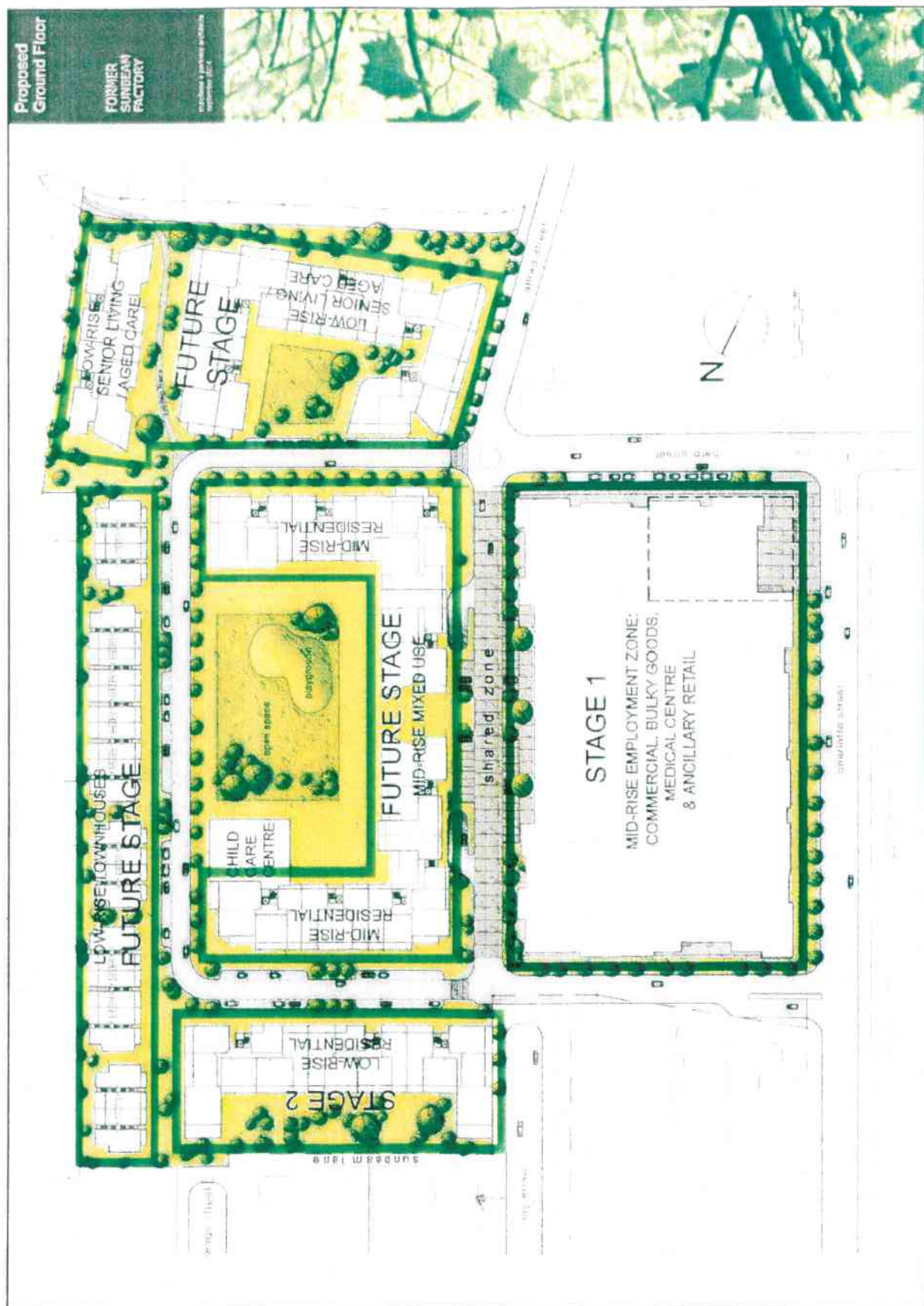


Figure 1: Project Outline Plan

Investigations are proposed to be undertaken in relation to the subject site and adjoining lands. These investigations will address the heads of consideration required to be considered by the Minister and Department of Planning including **Part 3A S75F Environmental Assessment Requirements for Approval** (Director General Requirements) prior to:

- a) the gazettal of the lands for Residential, Commercial or Retail project purposes under Clause 13 of Schedule 1 of *SEPP (Major Projects) 2005*; and
- b) the determination of the Application by the Minister.
- c) In this regard, **items a.** (declaration and gazettal) and **b.** (assessment and determination) could occur concurrently or sequentially as may be determined by the Minister.

1. LOCATION OF SITE

The site encompasses two lots legally described as Lot 1 DP 721721 and Lot A DP 431356. Lot 1 has an area of 43,051m and Lot A has an area of 11,795m² with a total area of 54,846m². The site is located approximately 1.5km north of the M5 motorway and 250m south of Canterbury Road which runs east-west linking the Sydney CBD with the greater western suburbs. The site is bordered by Charlotte Street to the West of the site, and Troy Lane and Sunbeam Lane to the North. Harp Street curves around to border the south west of the site. (see **Figure 2**)

The site appears to be located within, or within close proximity to, the Canterbury Road Enterprise Corridor and the M5 Economic Corridor as identified in Figure B8 of the Sydney Metropolitan Strategy 2005.

2. CURRENT ZONING AND USE

The site is zoned **4(b) light industrial** pursuant to Canterbury Planning Scheme Ordinance and is generally surrounded by residential developments. Zone 2(a) residential "A" exists to the south, east and west; and zone 2(b) residential "B" sites are located north. A combination of 2(a) residential "A" and 2(b) residential "B" zoning exists east of the site (See **Figure 3**).

Notwithstanding the above, various industrial uses adjoin the land in the south west corner of the site, within the continuation of the 4(b) Light Industrial zoned land.

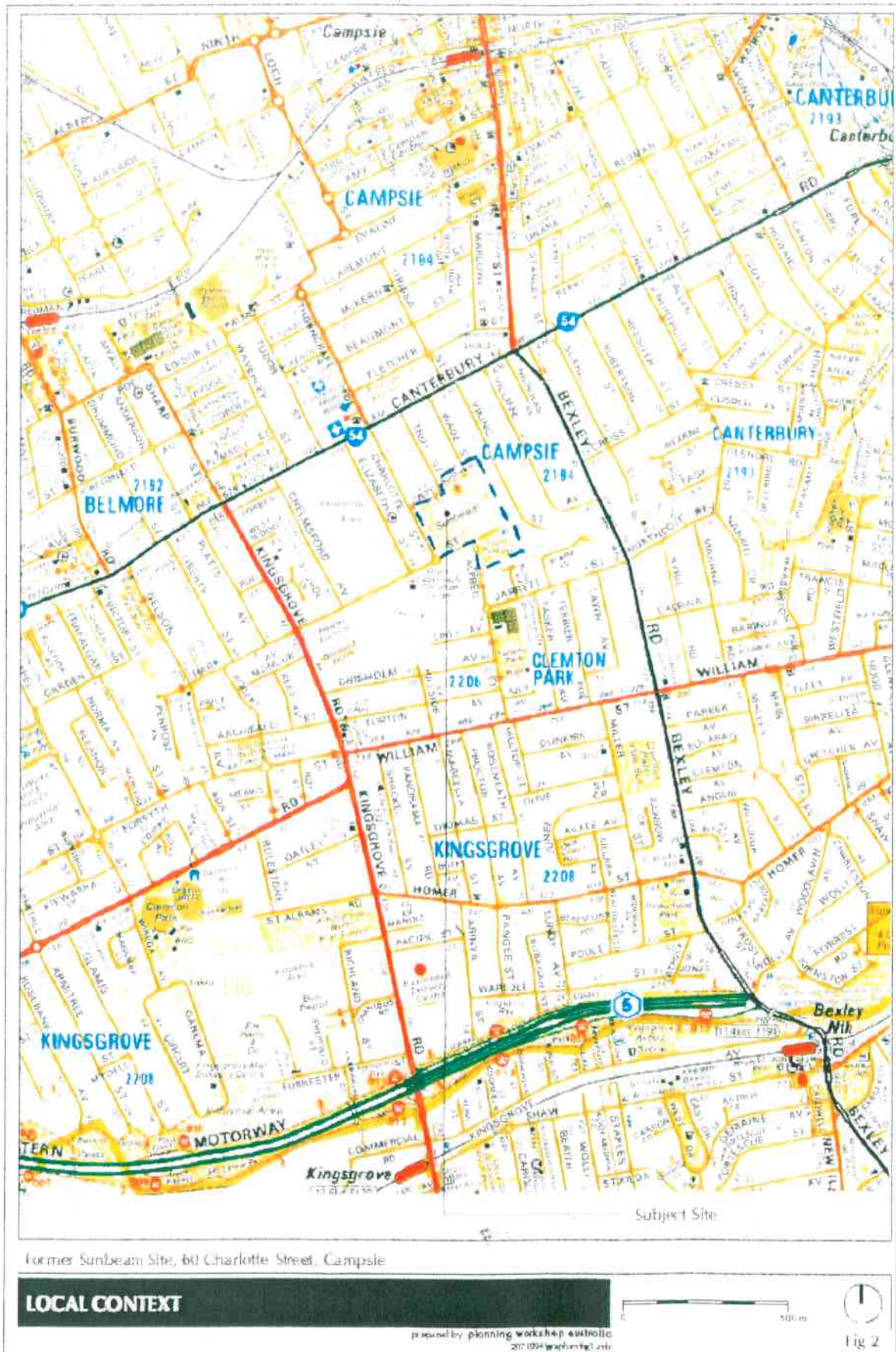


Figure 2: Locality Plan



Figure 3: Zoning

The site comprises a factory and ancillary buildings which were vacated in August 2002 by the former Sunbeam Factory. The manufacturing operations of the Sunbeam Corporation (and its predecessors) took place on the site from 1954 until this date. Part of the site is currently occupied on a temporary lease basis by individual industrial operators. Existing land uses within the Canterbury Road Enterprise Corridor and the M5 Economic Corridor vary significantly with large tracts zoned industrial, commercial and residential. The existing commercial and industrial premises are dominated by automotive trades and building trades services. There are also a substantial number of vacant commercial premises and a limited number and range of retail activities.

The proposed light industrial uses are permissible under the Canterbury Planning Scheme Ordinance while the residential, commercial and retail and bulky goods retail uses are prohibited.

3. THE PROPOSAL

The proposal is for a mid-rise employment zone consisting of commercial, bulky goods, medical centre, child care centre and ancillary retail services, as well as low to mid rise residential and mixed use zones including seniors living on a large underutilised site. (see Figure 1)

Future development work will be in accordance with the Gross Floor Area for each superlot/stage defined within the Concept Plan. The consent issued by the Minister is expressly for envelopes and requires new applications to be lodged.

The design of the buildings (except those related to Project Application Stage 1 and Stage 2) will be subject to detailed drawings prepared consistent with the Project Application that would show building materials, building heights, internal layout and connection to services and be in accordance with a community management plan.

Moreover, the subject site provides the opportunity to provide design excellence on a significant scale and in a form not yet seen within the Council area. As such the site will be a catalyst for improved architectural excellence and urban design considerations for the Council area as a whole. The site offers significant scope to combine both employment activities within what will become a new 'centre' of high calibre urban design.

4. CAPITAL INVESTMENT VALUE

The capital investment value is estimated to be in excess of **\$250,000,000.00**.

5. JUSTIFICATION AS TO WHY THE SITE ACHIEVES STATE OR REGIONAL PLANNING OBJECTIVES:

For the purposes of Clause 13 of Schedule 1 of *SEPP (Major Projects) 2005*, residential, commercial or retail construction projects are likely to contribute significantly and tangibly to achieving State or regional planning objectives in the following manner:

a. Local impediments to urban renewal

The site is located within the Canterbury Road Enterprise Corridor and the M5 Economic Corridor pursuant to the Metropolitan Strategy. In particular, Strategy A Economy & Employment and Strategy B Centres & Corridors are of relevance to the opportunities presented by the proposal. The impediments to urban renewal in this area is the current

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zoning and piecemeal land ownership. In this regard, the subject site offers a unique opportunity not otherwise available in the area.

b. Facilitate housing or job growth

The proposal is located within the M5 Economic Corridor pursuant to the Metropolitan Strategy, is consistent with the objectives and initiatives for Economy and Employment, and will assist in the State government attempts to manage the shifts in industry and resultant underutilized industrial areas, by facilitating development of additional higher employment generating uses within otherwise under-utilised light industrial lands.

The proposal would allow a more varied mix of employment uses to be incorporated in the Campsie and Clemton Park region to assist in the accommodation of changing employment trends. The proposal will assist in the renewal of the area through increased economic activity and employment opportunities, providing development in a location with abundant public and private transport options; and enhancing the viability of a currently unused site through the provision of a diverse range of development; in effect creating a new "centre" for working and living.

c. Transport accessibility

The site is located in close proximity to three major distributor roads, namely Canterbury Road, Kingsgrove Road and Bexley Road. Canterbury Road is the main access road to the greater west and the Sydney CBD, and is directly accessible from the site through Charlotte Street. Bexley Rd (east) and Kingsgrove Rd (west) connect with Canterbury Rd approximately 250m from the site and run south to connect to the M5 South West Motorway (M5), the key route between the Sydney CBD and the South Western suburbs. Kingsgrove Road is also accessible through the industrial area via Harp Street.

The public transport infrastructure links the site with a significant labour force, through bus routes along Canterbury Road and Bexley Road as well as access to the rail network via Campsie train station.

d. Improved infrastructure

The Industrial Zone and the subject site are well serviced by infrastructure as a long established industrial area.

A 'Statement of Commitments' and the terms of a Draft Planning Agreement will be prepared as part of the Application identifying the infrastructure (local roads and other services) to be provided as part of the project.

e. Environmental Sensitivity

The site comprises a factory and ancillary buildings which were vacated in August 2002 by the former Sunbeam Factory. Part of the site is currently occupied on a temporary lease basis by individual industrial operators. The subject site does not have significant conservation value nor is the project located in or adjacent to coastal locations, important wetlands, critical habitat, World Heritage areas, or areas of high cultural heritage or landscape significance.

One inherent characteristic of the site is that previous investigations have identified contamination of the site through the previous operation of the former Sunbeam factory. Remediation of the site has been undertaken in line with the requirements of the NSW

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EPA, and included identification and remediation of contaminants that had migrated off site to the north of Troy Lane, and remediation of soil and groundwater elsewhere on the site.

f. Local Council issues

The proponent had an audience with Mr. Sartor and Canterbury Council on 14 June 2007 wherein the details of proposal were discussed. At this preliminary meeting it was indicated that, in principle, the proposal was supported. Subsequent consultations with Council were undertaken on 12 July 2007 and 16 July 2007.

Key Council personnel included:

Mr. Robert Furolo - Mayor

Mr. Jim Montague - General Manager

Mr. Robert Davidson - Director of Planning

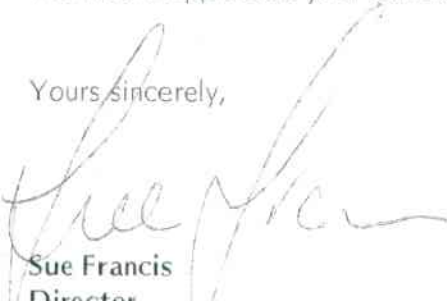
Whilst Council supports the proposal in principle, it can not determine the application under Part 4 of the Act due to the prohibited nature of some of the proposed uses – due to the old nature of the existing planning instrument – It has been acknowledged that rezoning is possible but the Council, being cognisant of the timing required to pursue such a rezoning, and the economic impediment that that timeframe would put on the landowner, has agreed that the matter could be addressed under Part 3A of the Act. Council indicated, nevertheless, that they would welcome involvement at future stages.

Accordingly, the proponent requests that the Minister be the consent authority for the Concept Application as well as for the Project Application including Stages 1 (employment zone) and 2 (residential component). Thereafter, the Minister, pursuant to **Section 23** of the Act, can delegate his functions to determine subsequent project/staging applications to Canterbury Council.

In this instance, it is considered that the site meets the criteria for determining if the provisions of *SEPP Major Projects* apply. It is therefore respectfully requested that the Minister consider the proposal under *State Environmental Planning Policy (Major Projects) 2005*. The proponents also request that the Minister authorise the preparation of a 'Concept Plan' for the 'project'.

We would appreciate your consideration and opinion on this matter.

Yours sincerely,



Sue Francis
Director
Planning Workshop Australia

cc: Mr. Sam Haddad
Director General NSW Department of Planning

Mr. Jason Perica
Executive Director Strategic Sites and Urban Renewal

APPENDIX 3

LETTER FROM DoP ACCEPTING THE DEVELOPMENT UNDER PART3A ON 11 JANUARY 2008



NSW GOVERNMENT
Department of Planning

17 JAN 2008

Contact: Anthony Witherdin
Phone: (02) 9228 6173
Fax: (02) 9228 6540
E-mail: anthony.witherdin@planning.nsw.gov.au

Ms Sue Francis
Director
Planning Work Shop Australia
GPO BOX 3275
SYDNEY NSW 2001

Our ref: MP 07_01065
Your ref:
File: S07/01183

Dear Ms Francis,

**Subject: Proposed Mixed Use Development at 60 Charlotte Street Campsie
(former Sunbeam Site)**

I refer to your recent letter regarding the above proposal in which you requested confirmation that your proposal is a Major Project to which Part 3A of the *Environmental Planning and Assessment Act, 1979* (the Act) applies, and sought authorisation for the submission of a Concept Plan.

I am writing to advise you that the Minister formed the opinion on 20 December 2007 that your proposal is a Project to which Part 3A of the Act applies, and authorised the submission of a concept plan pursuant to Section 75M of the Act.

In forming the opinion the Minister noted the Department's concerns regarding the loss of employment land from this site, particularly as the site is identified within the recently released South Subregional Strategy as land to be retained for industrial purposes. Whilst the Department supports redevelopment on the site and is willing to consider some non employment uses despite the Subregional Strategy, the residential component of the proposal should be reduced in favour of greater industrial/employment uses.

You may now apply for the approval of the Minister to carry out the Concept Plan and a concurrent Project Application if desired. In seeking the Minister's approval, Section 75E of the Act requires you to lodge an application with the Director General. The application you will lodge with the Director General must include a completed Application form, a Preliminary Assessment based on the information contained in this Schedule, and the correct fee. I have enclosed an Application Form with this letter, along with a schedule that identifies what information should be addressed in the Preliminary Assessment and the fees to be paid.

If you have any questions concerning any of the above matters or information required for the Preliminary Assessment, you should contact Anthony Witherdin on the phone number 9228 6173 or via e-mail to anthony.witherdin@planning.nsw.gov.au.

Yours sincerely

Jason Perica
Executive Director
Strategic Sites and Urban Renewal

Schedule – Information required at lodgement

Application form	You must complete in full the Application for a Major Project form enclosed.
Preliminary Assessment – Purpose	The purpose of the Preliminary Assessment is to assist the preparation of the Director General's Environmental Assessment Requirements. The purpose of the Preliminary Assessment is to culminate in a summary of the "Key Issues". Key Issues are those matters that if not addressed satisfactorily may lead to refusal of the project.
Preliminary Assessment – Identifying Key Issues	"Key Issues" will emerge from: (a) the proponent's consultation with all relevant agencies and groups, and (b) from the proponent's assessment of the proposed project against applicable environmental planning instruments, policies, guidelines and other relevant planning documents. "Key issues" could include, but may not be limited to: (a) non-compliances with known relevant planning controls; (b) known community concerns about the development proposed; (c) potential environmental impacts associated with construction, operation, or occupation of a project; (d) likely environmental risks; (e) constraints arising from the peculiarities of a project site. "Key Issues" should not include those aspects of a proposed project that comply with known planning controls; where there are no community concerns or where there are no other contentious matters.
Preliminary Assessment – Information to be addressed	The Preliminary Assessment should include: (a) a written and graphical description of the project and any ancillary components, including relevant preliminary plans; (b) the location(s) and a map identifying the site(s)/alignment/corridor; (c) the planning provisions applying to the site and whether the project is permitted under the prevailing EPs, DCPs, policies, etc, and if the project is inconsistent with such instruments/plans/policies; (d) the views of the other agencies, local council and/or the community if known; (e) an identification of any study or investigations undertaken for the preparation of the Metro Strategy or other regional or local strategies that may affect the Project; (f) a quantity surveyor's cost estimate report to verify the capital investment value of the project.
Application Fee	\$1000.00, based on the set fee for lodgement of a MP application. Outstanding fee's (to be determined) are to be paid at the lodgement of the Environmental Assessment.
Copies of Documentation	10 copies of all documentation lodged (including plans)
Electronic Version of Documents	1 CD in Rich Text Format of all documentation lodged, and 1 CD in PDF format of all documentation lodged, and All plans should be in PDF format. Note: In the event that the documentation exceeds 5

	Megabytes, you should contact the liaison officer prior to lodgement. Please be aware that you may be required to prepare a website for your Project.
Acceptance of Application	The Director General will not accept your application until such time as you complete all the information required by this schedule, the accompanying fee, and a completed application form