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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.

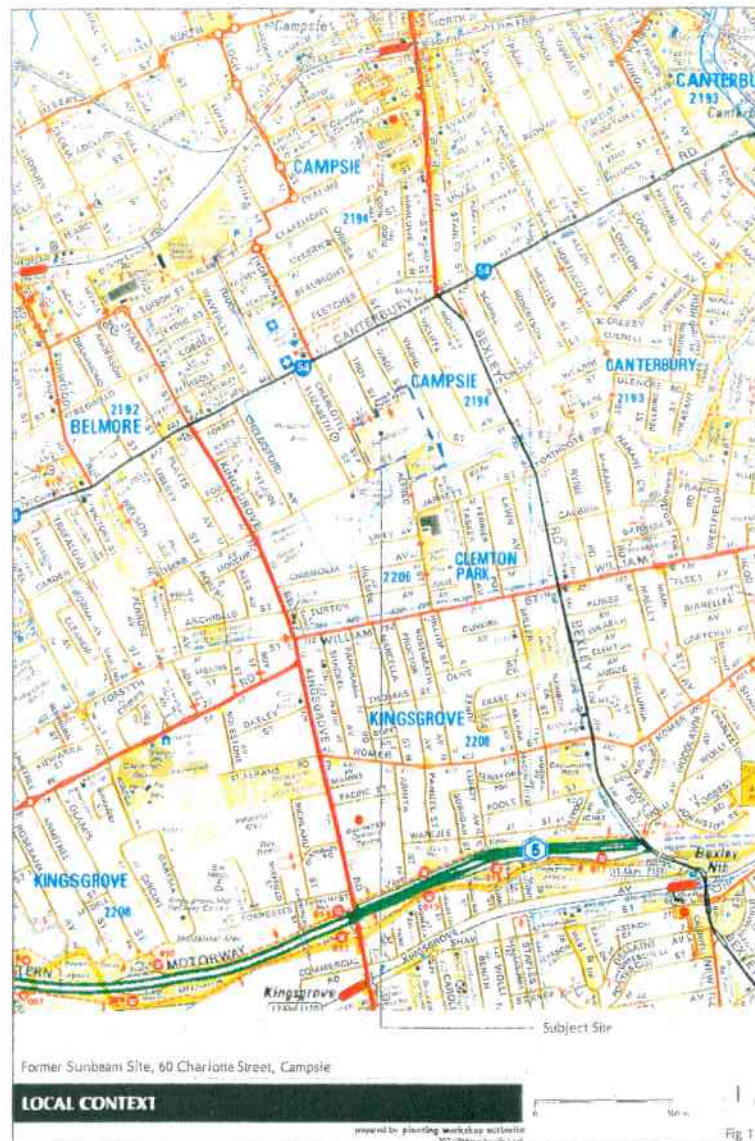
ZONING

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

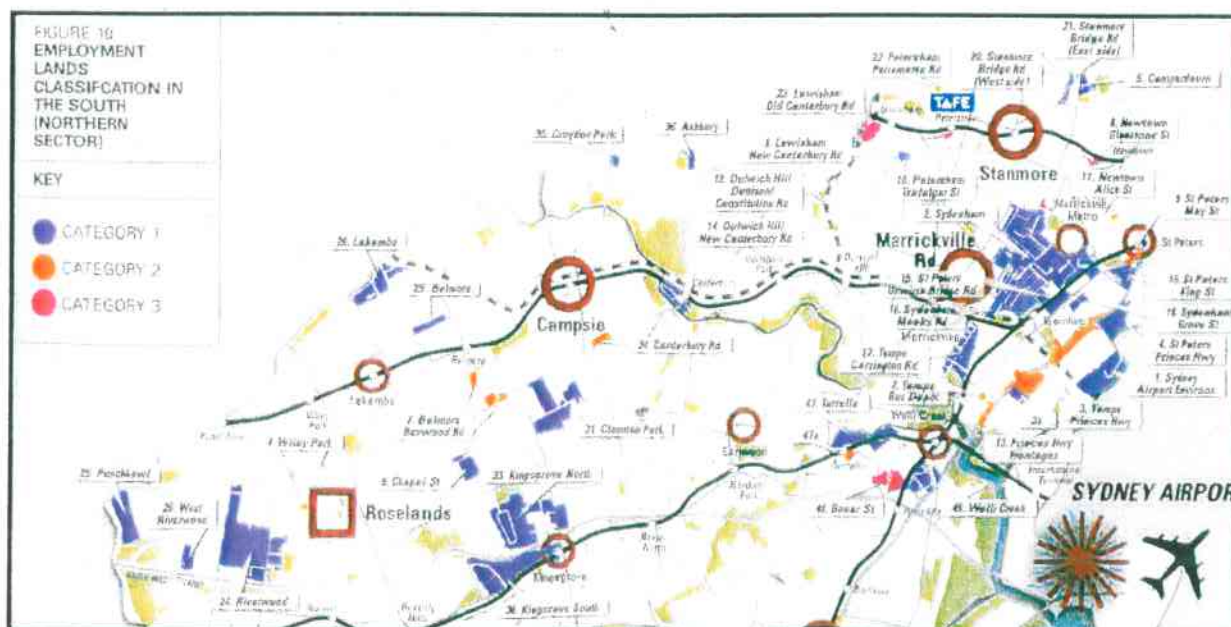
3. FUTURE ROLE OF THE SITE WITHIN THE EMPLOYMENT LANDS

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 Clemton 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