

Appendix D – Part 1

Summary of submissions to the public exhibition of the draft Employment Lands Strategy

Summary of submissions on public exhibition of the Draft Employment Lands Strategy (2013) and the City's response

ABREVIATIONS:

B4 – B4 Mixed Uses zone	DCP – Development Control Plan
B5 – B5 Business Development zone	FSR – Floor Space Ratio
B6 – B6 Enterprise Corridor zone	LEP – Local Environmental Plan
B7 – B7 Business Park zone	RMS – Roads and Maritime Services
IN1 – General Industrial zone	Town Centre – Green Square Town Centre

Ref	Submitter	Summary of issues raised	Response
1	Landowner in the IN2 zone	Supports land use planning controls proposed for subject site.	Noted.
4	Various landowners in the B5 zone – located in the north of the southern employment lands near the Town Centre	<p>(1) The site is appropriate for B4 Mixed use zoning.</p> <p>(2) Concentration of commercial floor space in the new Town Centre LEPs will undermine the potential to achieve commercial floor space outside of the GSTC. There is insufficient demand for commercial space in this area.</p> <p>(3) Some of the proposed uses in the proposed zone, such as garden centres or warehousing, would be inappropriate on the subject site.</p> <p>(4) The highest and best uses under the proposed zone will likely be high traffic generators and contribute to the already constrained transport network.</p>	<p>(1) The draft Planning Proposal aims to ensure sufficient employment land is retained in the City of Sydney to:</p> <ul style="list-style-type: none"> • facilitate job creation and contribute to employment targets in the Metropolitan Plan 2036; • support key state infrastructure including the airport; • facilitate opportunities for new businesses and industries to develop; and • ensure uses that are crucial to the functioning of the city can continue to locate close to the city. <p>Given the markedly higher value of residential floor space in the area, relative to commercial uses, applying a B4 zone (that permits residential uses) would result in a high proportion of employment uses (current and potential) being displaced.</p> <p>While the proximity of the subject site to the Town Centre and train station is noted, these qualities make it an equally attractive location for higher density employment uses, commercial or otherwise, and on their own do not constitute sufficient justification for application of the B4 – Mixed use zone. The subject site currently accommodates, and will continue to be capable of accommodating, employment uses.</p> <p>(2) The proposed zoning (B7 Business Park zone) will permit a broad range of employment generating uses, from high employment density commercial uses, to retail, to relatively low density industrial and warehouse uses.</p> <p>The economic opportunities study identifies a demand for a range of business uses, many commercial-type uses that have to date been prevented from being accommodated in the southern employment lands owing to the current planning restrictions.</p>

5	City of Botany Bay	<p>While the current difficulties in attracting 'traditional' commercial development in the Town Centre are acknowledged, rather than undermine demand in the Town Centre, the proposed B7 zone will cater to demand for non-traditional office uses and flexible spaces - uses that are unlikely to be accommodated in the Town Centre. Moreover, facilitating these uses outside of the Town Centre will encourage a more intense use of the land for employment activities, which will contribute to greater day time activity in the Town Centre, which is predominantly residential development.</p> <p>(3) While such uses may not be suitable for the subject site, there are other sites within the proposed zone where they may be suitable. Any proposed redevelopment of the site will require a development application which will be subject to merit assessment of its appropriateness.</p> <p>(4) The location of the subject site and its proximity to the Green Square train station will maximise opportunities for workers to utilise public transport.</p>	<p>(1) The interface between the high density residential development to the south of Gardeners Road and the uses on the northern side are important. There is some concern that some uses proposed to be permitted along Gardeners Road, such as 'Entertainment facilities' will impact on residential amenity.</p> <p>(2) A regional approach to traffic and transport management is required.</p> <p>(3) The potential to establish Bourke Road and O'Riordan as the primary arterial roads through the strategy area should not be considered due to its potential impacts on the future Mascot Station Town Centre.</p> <p>(4) Supports actions in the draft Strategy to address and minimise flooding impacts.</p> <p>(5) Supports the use of the B4 zone in proposed locations.</p> <p>(6) Is concerned with the 'heavy' industrial uses that are being proposed in the industrial area because of their potential impacts on residential amenity and recommends that heavy industry not be permitted in the Strategy area.</p>
		<p>(1) It is agreed the interface between residential development and other uses is an important consideration in preparing new zoning and planning controls for the employment lands. The proposed zoning is intended to facilitate a broad range of employment generating uses, with the intention that over time the employment density of the area will increase.</p> <p>It is appropriate that as the number of jobs increases in the employment lands those workers have access to social amenities and services. Flexibility in the land use table to permit these uses is considered appropriate.</p> <p>Notwithstanding this, any proposed redevelopment will require a development application which will be subject to merit assessment. Where appropriate, conditions of consent can be applied to mitigate any impact on residential development.</p> <p>It is noted that the high density residential development to the south of Gardeners Road (between Botany Road and Kent Road) is located in a B4 Mixed Use zone, which permits 'Entertainment facilities'.</p> <p>(2) Noted and agreed. There remains varying levels of uncertainty about how considerable traffic and transport drivers might impact the area in the future, for example:</p> <ul style="list-style-type: none"> WestConnex, and the location of its entry and exit portals, will likely have a profound impact on the study area. While it is understood RMS are modelling the likely outcomes of various scenarios, no information is available to the City at this time; 	<p>(1) It is agreed the interface between residential development and other uses is an important consideration in preparing new zoning and planning controls for the employment lands. The proposed zoning is intended to facilitate a broad range of employment generating uses, with the intention that over time the employment density of the area will increase.</p> <p>It is appropriate that as the number of jobs increases in the employment lands those workers have access to social amenities and services. Flexibility in the land use table to permit these uses is considered appropriate.</p> <p>Notwithstanding this, any proposed redevelopment will require a development application which will be subject to merit assessment. Where appropriate, conditions of consent can be applied to mitigate any impact on residential development.</p> <p>It is noted that the high density residential development to the south of Gardeners Road (between Botany Road and Kent Road) is located in a B4 Mixed Use zone, which permits 'Entertainment facilities'.</p> <p>(2) Noted and agreed. There remains varying levels of uncertainty about how considerable traffic and transport drivers might impact the area in the future, for example:</p> <ul style="list-style-type: none"> WestConnex, and the location of its entry and exit portals, will likely have a profound impact on the study area. While it is understood RMS are modelling the likely outcomes of various scenarios, no information is available to the City at this time;

		<ul style="list-style-type: none"> • Town Centre, timing and staging; • The Mascot Town Centre, which is currently on hold until the WestConnex has been resolved; • a second airport in the Sydney basin, which will likely impact on the function and transport demands on Sydney Airport and by extension the study area; • the nature of growth at Sydney Airport; • a second rail crossing being provided on the Sydney Harbour Bridge, which is required to alleviate capacity pressures at Green Square and Mascot train stations; • take up of development opportunities in the employment lands as they are rezoned; • potential introduction of a one way pairing on Bourke Road and O'Riordan Street, as identified in the NSW Government's Long Term Transport Master Plan. <p>It is noted that the growth projected by this draft Planning Proposal will occur over a 16 year period with those areas with the lowest levels of accessibility unlikely to experience high levels of development in the short to medium term. Given the long development timeframes it is premature to undertake detailed modelling and assessment of cumulative transport impacts associated with subregional growth until at least most of the above factors have been more resolved.</p> <p>As growth in the southern employment lands accelerates, and more information about key transport drivers in the area becomes available, it will be important that the City work with Roads and Maritime Services (RMS), Transport for NSW (TFNSW) and Botany Bay Council to review transport management strategies for the southern employment lands in the context of the sub-region.</p> <p>(3) Noted. This draft Planning Proposal does not elevate the importance of O'Riordan Street or Bourke Road in the existing road hierarchy.</p> <p>(4) Noted.</p> <p>(5) This draft Planning Proposal does not include any B4 Mixed use zoning, although affordable housing may be developed in appropriate locations.</p> <p>(6) The draft Planning Proposal will retain the IN1 General Industrial zone on land located in the south western corner of the southern employment lands. 'Heavy industries' are not to be permitted in the IN1 zone. The rationale for concentrating the City's industrial activities in this area is:</p>
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			<ul style="list-style-type: none"> • it consolidates heavier uses where they already exist. The location is relatively isolated and is buffered from other, more sensitive, uses by the Alexandra Canal, Sydney Park and main roads; and • it provides good accessibility to airport and road networks, including the proposed exit of WestConnex along Qantas Drive, and therefore has potential to attract related freight and logistics uses.
6	Resident (Birmingham Street, Alexandria)	<p>(1) Supports improved traffic and transport management in the southern employment lands, particularly with regard to heavy vehicle movement on streets where residential development has occurred.</p> <p>(2) Encourages rezoning for more residential development in Alexandria to reduce the impact of industrial uses in the area on residential development.</p>	<p>(1) As the area transitions to a higher value employment area over time it is likely that the frequency of heavy truck traffic will decrease. It is important that non-residential uses continue to be able to function in mixed use areas within reasonable parameters.</p> <p>(2) While the draft Planning Proposal ensures employment lands are primarily being retained for employment uses, affordable housing may be developed in appropriate locations.</p>
7	Ausgrid	<p>Subject sites were purchased for a depot to provide and maintain electricity infrastructure, however 'depots' are proposed to be prohibited in the proposed B6 zone and Ausgrid cannot rely on the State Environmental Planning Policy (Infrastructure) 2007 for approval. It is therefore requested that permissibility be facilitated by identifying a "public utility undertaking" as a permissible use within the B6 zone.</p>	<p>The draft Planning Proposal identifies the subject site in the B7 Business Park zone. Generally, permitted land uses are to support existing light industrial activities and to facilitate a range of higher order employment generating uses, such as commercial offices to facilitate knowledge intensive industries. Depot uses would generally not be sympathetic with the future vision of the B7 zone which includes supporting higher value jobs and encouraging improved amenity.</p> <p>The Standard Instrument Land Use Table – Direction 5 establishes the types of development that may be included in a Land Use Table. 'Public utility undertaking' is not identified in this table and therefore cannot be identified as a permissible use. Notwithstanding this, depot uses are not compatible with the aspirations for the zone.</p> <p>The SEPP (Infrastructure) may provide an approval path for land uses associated with the provisions and/or maintenance of electricity infrastructure.</p>
8	NSW Ports Port Botany	<p>(1) Concerned that the draft Strategy does not retain sufficient industrial land to accommodate population projections to 2036.</p> <p>(2) Stresses the importance of protecting strategically important industrial lands located near State significant economic hubs and infrastructure, including Port Botany.</p> <p>(3) It is recommended that a new zone objective be included for non-industrial zoned lands requiring that uses do not impact on the economic viability of industrial lands or the expansion of these lands and their use.</p> <p>(4) The IN1 zone objective to 'minimise any adverse effect of industry on other</p>	<p>A full response to the submission made by NSW Ports is included following this table.</p> <p>It is considered that the reduction in land zoned for industrial purposes is adequately supported.</p> <p>It is agreed that the reduction of the industrial zone may increase the potential for development in adjoining zones to impact on the operational flexibility of the industrial zone. To address this, an additional objective is proposed in the adjoining B6 zone. The objective is to ensure uses in the B6 support the viability of the adjoining industrial zone for industrial uses.</p>

		<p>land uses' will potentially undermine the economic viability of remaining industrial lands and their ability to expand operations.</p> <p>(5) Developments such as childcare centres, educational facilities and the like, located in close proximity to industrial lands must consider measures to address potential external noise sources from industrial operations.</p> <p>(6) The inclusion of 'Industries' as a prohibited development type for the B6 zone is not supported.</p>	
9	Landowner in the IN2 zone	<p>(1) Generally supports the recommendations of the draft Strategy and the proposed B4 Mixed Use zone for the subject site. The FSR and height controls require review so they are viable and facilitate development. The future planning controls for B4 areas should facilitate but not require live/work arrangements.</p> <p>(2) The provisions for car parking must facilitate sufficient on and off site parking to cater for the changing needs of the area.</p> <p>(3) Affordable housing requirements must be tested for financial viability.</p> <p>(4) The required contribution towards infrastructure should not limit the viability of new development.</p> <p>(5) Future controls should allow flexibility to respond to the changing market conditions and demands of development in the local area.</p>	<p>(1) While the draft Planning Proposal ensures employment lands are primarily being retained for employment uses, affordable housing may be developed in the proposed B7 zone in appropriate locations.</p> <p>(2) To assist in managing parking in the employment lands, the current approach in the Sydney LEP 2012 which establishes maximum parking rates is maintained by the draft Planning Proposal. In the main, the southern employment lands are currently identified as Category C on the Land Use Transport Integration Map (LUTI map), which guide parking rates for residential development, and Category F on the Public Transport Accessibility Level Map (PTAL map), which guides parking rates for non-residential development. While Category C and Category F, having the lowest accessibility ratings, and thereby allow for the highest parking rates available in Sydney LEP 2012, as public transport and access to services improves over time, LUTI and PTAL ratings in the southern employment lands may be reviewed.</p> <p>(3) The draft Planning Proposal includes a provision for development to contribute to affordable housing. The contribution rate is generally consistent with the Green Square Affordable Housing Scheme which has operated successfully since 1999. Feasibility testing indicates the contribution is unlikely to have an impact on the viability of development in the southern employment lands.</p> <p>(4) The current Section 94 plan will continue to apply in the employment lands. There is no evidence to suggest that the current rates affect development viability, however should the review of the Section 94 Plan, which is currently underway, consider new rates, the impact on development will be a critical consideration.</p> <p>(5) Noted. The draft Planning Proposal and supporting draft employment lands DCP seek to allow flexibility.</p>
10	Landowner in the IN1	<p>(1) Supports the proposed B6 zoning on the subject site together with the</p>	<p>(1) Noted.</p>

	zone (bulky goods corridor)	<p>retention of “bulky goods retailing” as an additional permissible land use.</p> <p>(2) Notes the site is located in the potential ‘local centre’ on Doody Street as identified in the draft Strategy and believes the site is most suitable for a full line supermarket and/or factory outlet centre which would complement existing uses and support the realisation of the strategy. The type of development can provide ‘out-of-centre’ goods that would not undermine the primacy of the Town Centre. Therefore, the removal of clause 7.23(3) of SLEP 2012, that currently restricts the size of shops or markets on the site to 1,000sqm, is recommended.</p>	<p>(2) The removal of clause 7.23(3) of SLEP 2012 that currently restricts the size of shops or markets on the site to 1,000sqm is not supported at this time.</p> <p>It is noted growth resulting from the Strategy may result in additional demand for large floor plate food retail and grocery shopping. The City is to review its current retail strategies to consider the implications of the increased number of residents and workers. Additional centres may be identified in the City’s retail hierarchy as a result of the review. The location of any new centre is yet to be determined and will be the subject of this work.</p>
11	Landowner in the IN1 zone	<p>(1) Supports the proposed B6 zoning on the subject site.</p> <p>(2) Services and amenities for workers and visitors should be encouraged around nodal points and connecting paths throughout the precinct.</p> <p>(3) The DCP should guide the location of appropriate development in the B6 zone, with less parking at nodal intersection and less employee intensive development back from these areas. Surface parking for visitors should be a requirement, with the requirement to provide on-site parking for employees more flexible depending on distance to nodes and public transport.</p> <p>(4) Specifying a minimum mix of tenancy sizes should not be considered.</p> <p>(5) It is recommended the eastern edge of the canal be zoned B6 which will encourage pedestrian movement from Bourke Road to the canal and promote the use of the proposed cycleways/walkways along the canal.</p>	<p>(1) Noted</p> <p>(2) The B6 zone permits a range of uses to locate in the zone. There are a number of emerging ‘nodes’ in the areas where services and amenities for workers and visitors are co-locating. While co-location of these uses is generally supported, it is important that it does not constrain the ability of other land uses in the area to operate efficiently.</p> <p>The City is to review its current retail strategies to consider the implications of the increased number of workers in the southern employment lands. Additional centres may be identified in the City’s retail hierarchy as a result of the review. This would require implementation by way of a planning proposal.</p> <p>(3) To assist in managing parking in the employment lands, the current approach in the Sydney LEP 2012 which establishes maximum parking rates is maintained by this draft Planning Proposal. In the main, the B6 zone are currently identified as Category C on the Land Use Transport Integration Map (LUTI map), which guide parking rates for residential development, and Category F on the Public Transport Accessibility Level Map (PTAL map), which guides parking rates for non-residential development. While Category C and Category F, having the lowest accessibility ratings, and thereby allow for the highest parking rates available in Sydney LEP 2012, as public transport and access to services improves over time, LUTI and PTAL ratings in the southern employment lands may be reviewed.</p> <p>The draft employment lands DCP amendment allows for parking at grade where appropriate. It also includes provisions to encourage the adaptive reuse of car parking in the long term.</p> <p>In addition, the draft Planning Proposal includes provisions to ensure new development locates where it is adequately serviced by sustainable transport</p>

			<p>modes.</p> <p>(4) A minimum mix of tenancy sizes is not specified in the draft controls.</p> <p>(5) It is agreed this draft Planning Proposal and DCP amendment will provide opportunities to activate the eastern edge of the Alexandra Canal, however these opportunities must be considered in balance with the ongoing need to maintain industrial zoned land, particularly where industrial type uses are currently operating successfully or are in advanced stages of planning, such as the case with a number of depots locating along this side of the canal.</p> <p>It is important to note that retaining industrial uses and commercial and recreational opportunities are not necessarily antipathetic objectives. There are numerous local and international examples of successful and vibrant areas that accommodate a range of activities. The draft employment lands DCP amendment includes provisions that specifically address the delivery of the City's 'Liveable Green Network' along the canal. Provisions include requirement for setbacks, active frontages to the canal, landscaping and so on. In addition, the draft employment lands DCP amendment includes indicative future roads and links to improve access to the canal from the east and north through the proposed B6 zone.</p>
12	Resident (Birmingham Street, Alexandria)	<p>(1) Strongly supports the 'Mixed Economy' scenario in the Employment Lands Study.</p> <p>(2) The transition from the current low value manufacturing area to a place of 'new innovation' must be facilitated by more than simply rezoning. It must deal with outdated operating guidelines for industrial activity to reduce its impact on residential development.</p>	<p>(1) Noted. The draft Planning Proposal directly reflects the 'Mixed Economy' scenario recommended by the Employment Lands Study.</p> <p>(2) Noted. As the area transitions to a higher value employment area over time it is likely that the frequency of heavy truck traffic will decrease. It is important that non-residential uses continue to be able to function in mixed use areas within reasonable parameters. The draft employment lands DCP amendment includes, for example, provisions to deal with noise at the interface of uses.</p>
13	Landowner in the IN2 zone	<p>Recommends amendments to the draft vision statement of the B4 zone to include reference to market housing. Appropriate objectives in future planning controls should be included to reflect the amended zoning statement. It should be ensured the B4 zone:</p> <ul style="list-style-type: none"> • land use table does not change and increased height and FSR controls facilitate development yield to enable viable development; • should not mandate a certain minimum percentage of non-residential uses per development; • should provide clarity about heritage listings and conservation areas and how they may affect the subject site; • encourage minimal car parking for affordable housing but recognise that reasonable levels of parking will need to be provided for new residents; 	<p>The Employment Lands Strategy has been significantly amended since the exhibition of the draft Strategy in June 2013. While no longer including a B4 zone, affordable housing may be developed in the proposed B7 zone in appropriate locations. Where market housing may be supported in future, it will be required to align with a number of principles stated in the Strategy.</p> <p>A key principle established by the Employment Lands Strategy is that any development in 'investigation areas' incorporating market housing will be a mix of employment, private residential and affordable housing.</p> <p>To improve the understanding of the City's historic industrial and warehouse resources and ensure Sydney's historic industrial past is appropriately protected from increasing development pressure, the City is undertaking the</p>

		<ul style="list-style-type: none"> include planning controls which make clear to future residents that they should not expect the same level of quiet as in other predominantly residential areas of the City; and Infrastructure contributions should be reasonable and fairly apportioned. 	<p><i>City of Sydney Industrial and Warehouse Building Study</i> (heritage study). The heritage study will identify, assess and review the significance of the historic industrial and warehouses in the LGA.</p> <p>While this draft Planning Proposal does not propose any additions to Schedule 5 – Heritage of the Sydney LEP 2012, it is likely the heritage study will inform future amendments to the heritage provisions and listings of heritage items in the employment lands.</p> <p>It is noted that future controls should provide appropriate clarity about any heritage listings and conservation areas and how they may affect the subject site.</p> <p>To assist in managing parking in the employment lands, the current approach in the Sydney LEP 2012 which establishes maximum parking rates is maintained by this draft Planning Proposal. In the main, the employment lands are currently identified as Category C on the Land Use Transport Integration Map (LUTI map), which guide parking rates for residential development, and Category F on the Public Transport Accessibility Level Map (PTAL map), which guides parking rates for non-residential development.</p> <p>While Category C and Category F, having the lowest accessibility ratings, and thereby allow for the highest parking rates available in Sydney LEP 2012, as public transport and access to services improves over time, LUTI and PTAL ratings in the southern employment lands may be reviewed.</p> <p>Managing the potential land use conflict as residential uses move into predominantly employment areas is a critical consideration. Provisions have been provided in the draft employment lands DCP to assist in the management of land use conflict as the area transitions.</p> <p>The City is currently reviewing its <i>Section 94 Development Contributions Plan 2006</i>, with the aim of efficiently utilising developer contribution funding as part of the City's broader capital delivery program. The best and fairest approach to funding infrastructure in the southern employment lands will be explored in that review.</p>
14	Landowner in excluded lands	<ol style="list-style-type: none"> The site should be zoned B4. The proposed B6 zoning will have unacceptable impacts on the value and potential to redevelop the site for residential uses, which will be prohibited. A B6 zone on the site is contrary to the 117 Direction that requires an LEP is not to reduce the permissible residential density of land. 	<ol style="list-style-type: none"> The Employment Lands Study and Employment Lands Strategy identify these lands as being strategically important employment lands. A B4 zone is not appropriate to the site. While it is noted that the site, which is currently zoned 10(e) – Mixed Use under the South Sydney LEP 1998, may allow for some residential development, an objective of the 10 (e) zone is that it is for predominantly

	<p>(3) If a B4 zone is not applied to the site in future controls, there will be no choice but to accelerate plans to redevelop the site under the current controls.</p>	<p>employment uses. Clause 10 of the South Sydney LEP 1998 requires that development satisfy the zone objectives. To date, no residential development has been approved on this site.</p> <p>A draft LEP may be inconsistent with a 117 Direction where the Director General can be satisfied that it is in accordance with the relevant Regional Strategy or Sub-Regional Strategy and gives consideration the Direction's objectives.</p> <p>The Employment Lands Study concludes that protecting the City's employment lands is critical to:</p> <ul style="list-style-type: none"> • accommodate employment growth and achieve NSW Government employment targets; • ensure sufficient land is protected to support the needs of state significant infrastructure; and • ensure sufficient industrial and business zoned land to support the substantial population growth projected in the sub-region. <p>In the context of the City of Sydney LGA, permitting residential uses in locations where the objective is to facilitate employment growth is economically incompatible. The economic study shows that, independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to feasibility and developer demand. It finds that in the context of the LGA, where residential uses are permitted within employment zones, the viability of non-residential uses, where they are not mandated, is limited. This holds with other mixed use zones in the LGA that have developed primarily into residential zones with only nominal amounts of non-residential uses achieved, for example Victoria Park or the Lachlan Precinct in the Green Square Urban Renewal Area.</p> <p>The Employment Lands Study and the economic study have directly informed the Employment Lands Strategy, which is prepared with reference to the 117 Directions and the <i>Metropolitan Strategy for Sydney 2036</i>, draft <i>Metropolitan Plan for Sydney to 2031</i> and <i>Sydney City Draft Sub-regional Strategy</i>, all of which identify the importance of these lands for employment uses.</p> <p>Given the Employment Lands Study and Employment Lands Strategy identify these lands as being strategically important employment lands, and that the evidence indicates residential uses are likely to displace employment uses, it is justified that the land zoned 10(e) and 10(d) Mixed Use be rezoned for solely employment generating purposes.</p>
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15	Landowner in excluded lands	<p>(1) The site should be zoned B4. The proposed B6 zoning will have unacceptable impacts on the value and potential to redevelop the site for residential uses, which will be prohibited.</p> <p>(2) A B6 zone on this site is contrary to the 117 Direction that requires an LEP is not to reduce the permissible residential density of land.</p> <p>(3) If a B4 zone is not applied to the site in future controls, there will be no choice but to accelerate plans to redevelop the site under the current controls.</p>	<p>(3) It is noted that some residential development is achievable under the current planning controls.</p>
		<p>(1) The Employment Lands Study and Employment Lands Strategy identify these lands as being strategically important employment lands. A B4 zone is not appropriate to the site.</p> <p>(2) While it is noted that the site, which is currently zoned 10(e) – Mixed Use under the South Sydney LEP 1998, may allow for some residential development, an objective of the 10 (e) zone is that it is for predominantly employment uses. Clause 10 of the South Sydney LEP 1998 requires that development satisfy the zone objectives. To date, no residential development has been approved on this site.</p> <p>A draft LEP may be inconsistent with a 117 Direction where the Director General can be satisfied that it is in accordance with the relevant Regional Strategy or Sub-Regional Strategy and gives consideration the Direction’s objectives.</p> <p>The Employment Lands Study concludes that protecting the City’s employment lands is critical to:</p> <ul style="list-style-type: none"> • accommodate employment growth and achieve NSW Government employment targets; • ensure sufficient land is protected to support the needs of state significant infrastructure; and • ensure sufficient industrial and business zoned land to support the substantial population growth projected in the sub-region. <p>In the context of the City of Sydney LGA, permitting residential uses in locations where the objective is to facilitate employment growth is economically incompatible. The economic study shows that, independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to feasibility and developer demand. It finds that in the context of the LGA, where residential uses are permitted within employment zones, the viability of non-residential uses, where they are not mandated, is limited. This holds with other mixed use zones in the LGA that have developed primarily into residential zones with only nominal amounts of non-residential uses achieved, for example Victoria Park or the Lachlan Precinct in the Green Square Urban Renewal Area.</p> <p>The Employment Lands Study and the economic study have directly informed the Employment Lands Strategy, which is prepared with reference to the 117</p>	<p>(1) The Employment Lands Study and Employment Lands Strategy identify these lands as being strategically important employment lands. A B4 zone is not appropriate to the site.</p> <p>(2) While it is noted that the site, which is currently zoned 10(e) – Mixed Use under the South Sydney LEP 1998, may allow for some residential development, an objective of the 10 (e) zone is that it is for predominantly employment uses. Clause 10 of the South Sydney LEP 1998 requires that development satisfy the zone objectives. To date, no residential development has been approved on this site.</p> <p>A draft LEP may be inconsistent with a 117 Direction where the Director General can be satisfied that it is in accordance with the relevant Regional Strategy or Sub-Regional Strategy and gives consideration the Direction’s objectives.</p> <p>The Employment Lands Study concludes that protecting the City’s employment lands is critical to:</p> <ul style="list-style-type: none"> • accommodate employment growth and achieve NSW Government employment targets; • ensure sufficient land is protected to support the needs of state significant infrastructure; and • ensure sufficient industrial and business zoned land to support the substantial population growth projected in the sub-region. <p>In the context of the City of Sydney LGA, permitting residential uses in locations where the objective is to facilitate employment growth is economically incompatible. The economic study shows that, independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to feasibility and developer demand. It finds that in the context of the LGA, where residential uses are permitted within employment zones, the viability of non-residential uses, where they are not mandated, is limited. This holds with other mixed use zones in the LGA that have developed primarily into residential zones with only nominal amounts of non-residential uses achieved, for example Victoria Park or the Lachlan Precinct in the Green Square Urban Renewal Area.</p> <p>The Employment Lands Study and the economic study have directly informed the Employment Lands Strategy, which is prepared with reference to the 117</p>

16	Urban Taskforce	<p>(1) The current vacancy rate and the slow redevelopment of the area is a reflection of the severe constraints in the strategy area. To address this, innovative planning and development controls are needed to encourage renewal. Controls should deliver a supply of land zoned for a wide range of uses, including residential. While a Green Paper/White Paper Enterprise zone or similar is encouraged across the entirety of the strategy area, as a minimum, the B4 zone should at least be extended across the areas identified as mixed business.</p> <p>(2) There is need to separate heavy industry from other uses, however lighter industry is compatible with other land uses and should be able to co-locate. Even if Council considers there is a justification for retaining some IN1 zoned land, there must be more flexibility as to the range of uses.</p> <p>(3) It is noted the Victorian Government recently announced that the retailing of bulky goods will be allowed in that state's industrial zones.</p>	<p>Directions and the <i>Metropolitan Strategy for Sydney 2036</i>, draft <i>Metropolitan Plan for Sydney to 2031</i> and <i>Sydney City Draft Sub-regional Strategy</i>, all of which identify the importance of these lands for employment uses.</p> <p>Given the Employment Lands Study and Employment Lands Strategy identify these lands as being strategically important employment lands, and that the evidence indicates residential uses are likely to displace employment uses, it is justified that the land zoned 10(e) and 10(d) Mixed Use be rezoned for solely employment generating purposes.</p> <p>(3) It is noted that some residential development is achievable under the current planning controls.</p>
			<p>(1) The Employment Lands Study concludes that protecting the City's employment lands is critical to:</p> <ul style="list-style-type: none"> • accommodate employment growth and achieve NSW Government employment targets; • ensure sufficient land is protected to support the needs of state significant infrastructure; and • ensure sufficient industrial and business zoned land to support the substantial population growth projected in the sub-region. <p>In the context of the City of Sydney LGA, permitting residential uses in locations where the objective is to facilitate employment growth is economically incompatible. The economic study shows that, independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to feasibility and developer demand. It finds that in the context of the LGA, where residential uses are permitted within employment zones, the viability of non-residential uses, where they are not mandated, is limited. This holds with other mixed use zones in the LGA that have developed primarily into residential zones with only nominal amounts of non-residential uses achieved, for example Victoria Park or the Lachlan Precinct in the Green Square Urban Renewal Area.</p> <p>In addition to the displacement of employment uses that may result from permitting residential uses in zones that have been identified for employment generating purposes, residential development is also likely to impact on the operational efficiency of an employment zone. While over time the proposed B6 zone will transition from primarily industrial uses to higher value uses, it will continue to support lighter industrial activities, warehousing uses, transport and logistic uses and so on into the foreseeable future. Despite a general shift towards industrial uses that are cleaner and quieter and more able to co-locate with other uses, permitting residential uses in the zone</p>

			<p>would erode the long term operational viability of the zone to accommodate land use activities that require long operation hours, early/late truck movements and so on, that may impact on residential uses.</p> <p>(2) Agreed. The proposed IN1 zone will generally accommodate 'heavier' industrial activity while the proposed B6 and B7 zones will accommodate a range of employment generating activities. Residential uses are generally not supported in these zones because of the reasons mentioned above.</p> <p>(3) Noted. It is agreed that bulky goods may be appropriate in some industrial areas however, in the context of the inner city, where there are significant land value pressures on the limited industrial land, bulky goods are likely to displace industrial uses.</p> <p>Moreover, bulky goods are not considered a compatible use in industrial zones with constrained transport accessibility as it undermines the efficient functioning of the zone. In industrial zones where this is not a particular concern, for example many industrial parks in the western suburbs of Sydney, councils may include 'bulky goods' as a permitted use in the IN1 land use table. However it is not appropriate in the employment lands in the City of Sydney.</p>
17	Landowner – various sites	<p>(1) Wholly supportive of the intent of the Employment Land Study and draft Strategy and concurs with many of its findings and recommendations. An independent study to examine key issues of relevance was undertaken. The study generally supported the findings of the Employment Land Study, further validating its recommendations.</p> <p>(2) The draft Strategy, once adopted must be a consideration for development applications and for planning proposals for rezonings.</p> <p>(3) Regular review of development controls and updates of supply and demand at a regional scale are required to continuously reassess the validity of the planning regime. The introduction of a specific state planning instrument to guide the development of the 'Trade Gateway areas', which include strategic industrial areas in the region including those lands proposed to be in the industrial zone in the draft Strategy, is strategically and economically necessary. It should adopt a contemporary approach to land use planning and include: increased flexibility in the type and mix of uses; looser operational restrictions; and allow for development typologies that accommodate new industry.</p> <p>(4) It is recommended that the vision statement for the proposed mixed uses zone not be limited to affordable or key worker housing, but that a mix of</p>	<p>(1) Noted.</p> <p>(2) The draft Planning Proposal, once on public exhibition, will be a matter for consideration in assessing development applications, in accordance with the <i>Environmental Planning and Assessment Act 1979</i>.</p> <p>The Employment Lands Strategy does not exclude the prospect of site specific planning proposals in 'investigation areas' where they are consistent with the objectives of the Strategy, State Government objectives and Council policy directions and/or targets and are in the net public benefit.</p> <p>(3) While the City has not explored the suggestion of a 'Trade Gateway' SEPP in detail, in-principle it is agreed that a regional approach to protecting and managing strategically significant employment lands, and ensuring their long term viability, is needed.</p> <p>(4) The Employment Lands Strategy has been significantly amended since the exhibition of the draft Strategy in June 2013. While no longer including a B4 zone, it includes principles to guide any future site specific planning proposals on the identified 'investigation areas' where mixed uses, affordable housing and market housing may be justified.</p>

	<p>housing typologies be encouraged.</p> <p>(5) The preparation of a strategic traffic study is supported so long as it does not seek to stifle growth in the area. Rather it should consider ways in which future growth can be accommodated. Additional public transport into the area, in particular light rail, is strongly supported. Additional investment in cycleways should be carefully weighed as it may cause conflict with heavy vehicle movement.</p> <p>(6) Future planning controls should consider incentive provisions for development which can provide public domain improvements and identified public benefits to improve certainty and avoid impacts upon development feasibility.</p> <p>(7) Council should consider extending the B4 zone further south to Maddox Street or Huntley Street to maximise activation within the precinct and act as a link between residential precincts at Ashmore and Rosebery, complementing and supporting the growth of the Town Centre. If Council is not supportive of the expansion of the B4 zone, it is recommended that some shop-top housing be permitted within the B6 zone.</p> <p>(8) The B4 zone should not be restricted in terms of the amount of residential development it allows.</p> <p>(9) The proposed location for the local centre at the top of the Alexandra Canal is not the best location. The best location would be further north, either the north corner of Bourke Road and Huntley Street or the corner of Bourke Road and Maddox Street, so that the local centre could take advantage of the commercial exposure on Bourke Street.</p> <p>(10) It is recommended that the need for employment generating uses to be 'ancillary' to industrial development within the IN1 zone. Many trade-related operations require associated supporting and complementary land use typologies which do not necessarily fit neatly within the definition of 'ancillary' but which are associated with the core business of an industrial or trade-related operation. This might include commercial premises or showrooms. It is considered unnecessary to preclude these associated uses from co-locating with other uses in the IN1 zone.</p> <p>(11) The mixed business zone should extend along the full extent of Huntley Street to encourage a consistent approach along this road corridor.</p> <p>(12) The bulky goods corridor should be extended to recognise existing uses such as Bunnings on the corner of Gardners Road and Bourke Road and an</p>	<p>(5) From a strategic perspective, long term transport accessibility represents the biggest ongoing constraint to growth in the southern employment lands. Large portions of the employment lands are poorly serviced by sustainable transport modes and it is important that as new development occurs that it encourage sustainable transport modes and where possible improve the permeability of the employment lands.</p> <p>To achieve these ends, the draft planning proposal includes provisions to facilitate the delivery of a finer grain road network and to promote sustainable transport usage where new development intensifies the use of the site. This is supported by more detailed DCP controls.</p> <p>As growth in the southern employment lands accelerates, and more information about key transport drivers in the area becomes available, it will be important that the City work with RMS, Transport for NSW, Botany council and landowners to review transport management strategies for the southern employment lands in the context of the sub-region.</p> <p>Irrespective of the timing for this later review, the City will continue to strongly advocate improved public transport to the southern employment lands.</p> <p>(6) Noted. The draft Planning Proposal will facilitate additional height or FSR where development dedicates land for the purpose of a public road.</p> <p>(7) The City does not support a B4 zone around Maddox Street or Huntley Street. The Employment Lands Study identifies these lands as being strategically important employment lands and notes their protection is critical to:</p> <ul style="list-style-type: none"> • accommodate employment growth and achieve NSW Government employment targets; • ensure sufficient land is protected to support the needs of state significant infrastructure; and • ensure sufficient industrial and business zoned land to support the substantial population growth projected in the sub-region. <p>In the context of the City of Sydney LGA, permitting residential uses in locations where the objective is to facilitate employment growth is economically incompatible. The economic study shows that, independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to feasibility and developer demand. It finds that in the context of the LGA, where residential uses are permitted within employment zones, the viability of non-residential uses, where they are not mandated, is limited. This holds with other mixed</p>
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	<p>existing approval at 506-518 Gardners Road.</p> <p>(13) Building heights of up to 26 metres and 2:1 FSR should be permitted in the IN1 zone to encourage a range of activities.</p>	<p>use zones in the LGA that have developed primarily into residential zones with only nominal amounts of non-residential uses achieved, for example Victoria Park or the Lachlan Precinct in the Green Square Urban Renewal Area.</p> <p>The Employment Lands Study and the economic study have directly informed the Employment Lands Strategy, which is prepared with reference to the 117 Directions and the <i>Metropolitan Strategy for Sydney 2036</i>, draft <i>Metropolitan Plan for Sydney to 2031</i> and <i>Sydney City Draft Sub-regional Strategy</i>, all of which identify the importance of these lands for employment uses.</p> <p>In addition to the displacement of employment uses that may result from permitting residential uses in zones that have been identified for employment generating purposes, residential development is also likely to impact on the operational efficiency of an employment zone. While over time the proposed B6 zone will transition from primarily industrial uses to higher value uses, it will continue to support lighter industrial activities, warehousing uses, transport and logistic uses and so on into the foreseeable future. Despite a general shift towards industrial uses that are cleaner and quieter and more able to co-locate with other uses, permitting residential uses in the zone would erode the long term operational viability of the zone to accommodate land use activities that require long operation hours, early/late truck movements and so on that may impact on residential uses.</p> <p>(8) The draft Planning Proposal does not include zones where private residential uses are permitted, however some affordable housing will be permitted in the proposed B7 zone.</p> <p>(9) The draft Planning Proposal does not propose additional centres in the City's retail hierarchy. The City will undertake a review of current retail strategies to consider the implications of the increased number of workers in the southern employment lands. The review will also seek to identify the appropriate location of any recommended centres.</p> <p>(10) The majority of land currently zoned IN1 is proposed to be rezoned to B6 and B7 by the draft Planning Proposal, substantially reducing the quantum of land in the LGA zoned IN1.</p> <p>The Employment Lands Strategy describes the long term aspiration for the remaining IN1 zone for a pure industrial zone with only minimal ancillary uses to support the industrial activities and workers. This is considered critical to maintaining a relatively low land value to accommodate essential industrial activity. It will also ensure the industrial zone remains operationally efficient.</p>
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18	NSW Roads & Maritime Services (RMS)	<p>Raises no objection to the proposed rezoning in the draft strategy, however requires a Traffic Management and Accessibility Plan (TMAP) be prepared for the employment lands. It is expected the TMAP will be finalised and adopted prior to the exhibition of any new draft planning controls. The TMAP will investigate a series of key issues such as the cumulative impacts as a result of the Sydney Airport Master plan.</p>	<p>In further consultations with RMS about the strategy, RMS has noted the significant progress made by the transport study in establishing an interim framework to guide sustainable growth in the southern employment lands.</p> <p>Growth in this area must be considered in the context of the broader land use and transport drivers in the sub-region. However, given the long development timeframes for the southern employment lands, and the extent of uncertainty about key drivers such as the WestConnex motorway, it is not feasible or practical for the City to undertake detailed modelling and assessment of cumulative transport impacts associated with subregional growth at this time.</p> <p>It is noted that RMS have already developed a mesoscopic model which covers the entire southern employment lands as well as surrounding areas. Council officers continue to liaise with RMS regarding the potential to utilise this model to test scenarios within the employment lands area.</p> <p>As the draft Planning Proposal progresses, RMS have requested some additional work be undertaken to complement the transport study, including further consultation with RMS and Transport for NSW to ascertain any approved road infrastructure upgrades in the area, any improved public transport services, improvements in accessibility to public transport modes, and rail and bus capacity.</p>

19	NSW Government Properties	<p>(1) The site affected by the draft Strategy is occupied by a Fire and Rescue NSW Training Centre. The Fire Station ownership of the site falls under the portfolio of the Minister for Emergency services. Objection is raised to the proposed B6 zone (on sites currently zoned B5) on the grounds that the inability to achieve residential development on the site will have implications on the property value of this significant public asset. It is recommended the subject sites be zoned B4.</p> <p>(2) Under South Sydney LEP 1998, the subject site was located in Zone 5 Special Uses which permitted residential development by virtue of the zone permitting uses that were permissible on adjacent sites. Concerns were raised during the exhibition of the Draft Sydney LEP 2010 about the impact of the change to the B5 zone would have on land values and the submission was not given due weight. Council has failed to meet the 117 Direction in relation to reducing residential development on a site.</p> <p>(3) The Employment Lands Study shows there is no shortage of floorspace for employment generating uses to 2036. And the 19% vacancy rate shows an oversupply of employment generating land.</p> <p>(4) Should Council apply a B6 zone to the site, Government Properties NSW is entitled to lodge a site-specific planning proposal to request application of the B4 zone. If it is not supported, the matter will be pursued with the Minister for Planning. As such, it is requested the B4 zone be applied to the site in the public interest.</p>	<p>Additionally, RMS have recommended the City further the RMS mesoscopic model to establish long term growth and mode share targets for the area. As mentioned above, this may be appropriate as more detailed information becomes available about key transport drivers in the area and when the model is made available for the City's use.</p> <p>(1) The City does not support a B4 zone on the site. While it is noted a B4 zoning would increase the value of the land, this is not a consideration in determining an appropriate zoning for any individual site in the employment lands, whether they are public or private land holdings.</p> <p>The appropriate zoning has been determined with reference to the Employment Lands Study which identifies these lands as being strategically important employment lands and notes their protection is critical to:</p> <ul style="list-style-type: none"> • accommodate employment growth and achieve NSW Government employment targets; • ensure sufficient land is protected to support the needs of state significant infrastructure; and • ensure sufficient industrial and business zoned land to support the substantial population growth projected in the sub-region. <p>In the context of the City of Sydney LGA, permitting residential uses in locations where the objective is to facilitate employment growth is economically incompatible. The economic study shows that independent of zoning, residential uses in the area are by far the most profitable, clearly outstripping the other categories of land use with regard to feasibility and developer demand. It finds that in the context of the LGA, where residential uses are permitted within employment zones, the viability of non-residential uses, where they are not mandated, is limited. This holds to the example of mixed use zones with the City's urban renewal areas that have developed primarily into residential zones with only nominal amounts of non-residential uses achieved, for example Victoria Park or the Lachlan Precinct in the Green Square Urban Renewal Area.</p> <p>It is of concern that once developed for residential purposes, residential land can rarely be converted back for employment generating purposes. That land is effectively lost in terms of its ability to accommodate productive uses.</p> <p>The Employment Lands Study and the economic study have directly informed the Employment Lands Strategy, which is prepared with reference to the 117 Directions, the <i>Metropolitan Strategy for Sydney 2036</i>, draft <i>Metropolitan Plan for Sydney to 2031</i> and <i>Sydney City Draft Sub-regional Strategy</i>, all of which identify the importance of these lands for employment uses.</p>
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20	City West Housing	<p>Recommends rezoning of industrial zoned land in Alexandria and light-industrial zoned land in Rosebery to residential uses would represent a significant uplift in land value for those properties. The benefit from any rezoning will make a positive contribution to affordable housing targets in the City of Sydney. The City may consider the following:</p>	<p>It is agreed that should a zone permitting residential uses be introduced in the employment lands there will be significant uplift in the value of that land, creating opportunities for the delivery of affordable housing.</p> <p>The draft Planning Proposal does not propose any zoning permitting private</p>

		<ul style="list-style-type: none"> creation of new schemes or mechanisms for the provision of affordable housing in exchange for a land use and built form 'uplift'; and opportunity to secure land (either outright or through ventures) to facilitate the development of affordable housing under the Green Square and Ultimo Pyrmont affordable housing schemes. 	<p>residential uses. However, consistent with the City's affordable housing strategy to encourage affordable housing through the planning framework, the draft Planning Proposal incorporates two approaches to maximise the amount of affordable housing in the southern employment lands including:</p> <ul style="list-style-type: none"> introduction of an affordable housing contribution scheme; and permitting 'affordable housing' in the B7 zone. <p>Site-specific planning proposals that include some private residential uses may be considered in identified 'investigation areas' where they achieve the principles outlined in the Strategy. The principles include requirements that affordable housing be incorporated into the development.</p>
21	Landowner in IN1 zone	<p>Concrite's Sydney concrete plant is located within the northern part of the southern employment lands. It operates a minimum of 6 days a week with up to 16 hour days to supply RMS and local government civil maintenance work. The city fringe location makes it a key strategic site, supplying concrete directly to various development projects within the CBD and the inner city. The current IN1 zoning reflects the nature of the operation and its surrounds. The proposed B4 zone aims to encourage affordable housing and childcare facilities. These uses are incompatible with the current use and will impact on the efficient operation of the site.</p>	<p>The draft Planning Proposal does not include any B4 zoning. Notwithstanding this, it is noted that the site is identified within the B7 zone that will permit affordable housing only in appropriate locations. The existing operations of the concrete plant and their externalities will need to be considered to establish whether an affordable housing proposal is appropriate in the vicinity of the plant.</p>
22	Landowner in IN1 zone	<p>Seeks an amendment to the "bulky goods" boundary to include the subject site as well as the adjacent sites to enable a sufficient site for a feasible bulky goods development. It is considered that the exclusion of the subject site from the bulky goods precinct is anomalous. It creates a barrier to possible site amalgamation and integration of future bulky goods premises along the eastern side of O'Riordan Street. The exclusion of the subject site is not considered to be promoting or co-ordinating the orderly and economic use and development of land, an objective of the <i>Environmental Planning and Assessment Act, 1979</i>.</p>	<p>In 2012 the City and Department of Planning and Environment agreed to the inclusion of the existing Schedule 1 boundary where existing bulky goods or vehicle sales or hire premises are located. This was supported in recognition of the current use of the land and the impracticalities of that use operating under existing use rights, rather than support for any expansion of the use in the zone.</p> <p>The City does not support the expansion of bulky goods uses in the proposed B6 zone. Bulky goods should continue to be consolidated within the existing Schedule 1 boundary where existing bulky goods premises are operating. Their expansion would negatively impact on the functioning of the southern employment lands.</p>
23	Landowner in IN1 zone	<ol style="list-style-type: none"> Both sites are highly suited to mixed-use development forms including high-density residential development with commercial (employment uses) located on the lower ground floors. The specific ratios between employment and residential should remain flexible and determined at the development proposal stages. A review of height and FSR controls is supported, however further consultation with the affected landowners should occur in the drafting of such controls. The densities achieved on adjoining land to the north and west 	<ol style="list-style-type: none"> The sites are identified in the draft Planning Proposal within 'investigation areas' which will allow for site-specific planning proposals where the principles of the Strategy are achieved. The draft Planning Proposal does not include zones where residential uses are permitted. A key principle established by the Strategy is that 'investigation areas' will be a mix of employment, affordable housing and is appropriate private residential uses. As mentioned above, the draft Planning Proposal does not include zones

		<p>of the Morley Avenue site should inform the review of maximum building height and FSR development standards for both sites.</p> <p>(4) Lower provision of on-site parking supply is supported in principle, however this should be based on the proximity and adequacy of public transport in addition to a more detailed analysis of future resident transport needs and commuting trends.</p> <p>(5) It is noted the Morley Avenue site occurs within an existing 'village centre' identified in the <i>Green Square and Southern Areas Retail Study</i> (2008), and is also nominated within the draft Strategy as being part of a 'potential local centre' with its future role yet to be determined.</p> <p>(6) While the aim to concentrate anchor retailers (such as supermarkets) in nominated centres is agreed in-principle, the approximate area of retail floor space (in sqm) or any intended limits (caps) on the size of retailers should be confirmed. Large 'anchor' retailers are an effective and often essential means to ensure the on-going viability of local/district level centres.</p>	<p>where residential uses are permitted. Additional urban design analysis is needed to inform appropriate densities in 'investigation areas'.</p> <p>(4) To assist in managing parking in the employment lands, the current approach in the Sydney LEP 2012 which establishes maximum parking rates is maintained by this draft Planning Proposal. In the main, the employment lands are currently identified as Category C on the Land Use Transport Integration Map (LUTI map), which guide parking rates for residential development, and Category F on the Public Transport Accessibility Level Map (PTAL map), which guides parking rates for non-residential development.</p> <p>While Category C and Category F, having the lowest accessibility ratings, and thereby allow for the highest parking rates available in Sydney LEP 2012, as public transport and access to services improves over time, LUTI and PTAL ratings in the southern employment lands may be reviewed.</p> <p>(5) The draft Planning Proposal does not propose additional centres in the City's retail hierarchy. The City will undertake a review of current retail strategies to consider the implications of the increased number of residents and workers in the southern employment lands. The review will also seek to identify the appropriate location of any recommended centres.</p> <p>(6) The current 1000sqm retail cap will continue to apply in this area.</p>
24	Landowner in IN1 zone	<p>(1) An FSR of 2.5:1 and a height of building control of 6-8 storeys (22-28m) would be a more appropriate density for this site.</p> <p>(2) The site is listed as a heritage item under the Sydney LEP 2012. An independent heritage review considers only the front elevation of the existing building is of heritage significance and that the proposed building height and FSR controls for the site were acceptable and would not adversely impact upon the heritage significance of the site subject to a suitable building design.</p>	<p>(1) The draft Planning Proposal identifies 'investigation areas' (within which the subject site is located) which will allow for site specific planning proposals where the principles of the Strategy are achieved. Appropriate height and FSR controls are to be established within these areas.</p> <p>(2) The City has engaged consultants to undertake the <i>City of Sydney Industrial and Warehouse Building Study</i>. The Study will potentially recommend some listings in the employment lands and will review existing listings. This submission, and heritage study, will be considered in finalising the study.</p>
25	Landowner in IN1 zone	<p>(1) Supports the proposed B6 zone.</p> <p>(2) The maximum building height should be between 65m to 85m, which is appropriate for the site and would be consistent with the future surrounding built form context.</p>	<p>(1) Noted</p> <p>(2) There is insufficient justification or urban design analysis provided for why the maximum building height on this site should increase so substantially. Amendment to building heights on this site is not supported.</p>