

9 August 2019

MR ALLAN SHOOTER
ACTING TEAM LEADER URBAN PLANNING
CANTERBURY BANKSTOWN CITY COUNCIL
PO BOX 8
BANKSTOWN NSW 1885

Delivery method by email: Allan.Shooter@cbc.city.nsw.gov.au

Dear Mr Shooter

GATEWAY DETERMINATION | 20-21 BOOREA AVENUE, LAKEMBA

We write in response to recent email correspondence, dated 24 June 2019, regarding additional information required by Council for the abovementioned project. It is understood that Council's email follows the recent receipt of Gateway Approval for the Planning Proposal from the Minister. Specifically, this letter addresses the matters raised by Council in relation to the previously submitted Economic Impact Statement.

The correspondence received from Council stated the following:

ECONOMIC IMPACT STATEMENT

The additional information memorandum by MacroPlan Dimasi is acknowledged.

The information sought is as follows:

New economic analysis of the impact of the planning proposal on the loss of employment lands, including responses to the matters detailed in the attached report by SGS Economics and Planning. The material as submitted by the applicant has been assessed as insufficient to properly address the Greater Sydney Regional Plan and the Revised Draft Sydney South District Plan.

SYDNEY HEAD OFFICE

SUITE 103 / 155 AVOCA STREET
PO BOX 170
RANDWICK NSW 2031

P +61 2 9399 6500

NEWCASTLE OFFICE

LEVEL 5 / 6 BOLTON STREET
PO BOX 313
NEWCASTLE NSW 2300

P +61 2 4929 6442

The four specific issues raised in the SGS report were:

- 1. Justification for the proposed use with regards to conflict with strategic policy objectives to protect industrial land.*
- 2. An understanding of whether the Canterbury Bankstown LGA has sufficient industrial land supply to meet future demand and so demonstrate that the site under its current use could be surplus to requirements.*
- 3. Comparison between the wider social benefits of the proposed use over the existing industrial use on site.*
- 4. Consideration of alternative sites and why this site is required.*

The memorandum only deals partly with these issues. As some commentary issue 1 is partly dealt with but the memorandum does not specifically deal with the strategic policy objectives to protect industrial land versus the other benefits of the site. Issue 2 has been dealt with in the memorandum. Regarding Issue 3 the memorandum describes the social benefits of the proposed use but does not compare this with the existing industrial use. The memorandum does not address issue 4.

Required action

Address the information gaps outlined above. For the purposes of clarity, the report should be structured in a way to specifically address these issues

We understand that Issues 1, 3 & 4, listed above, require further clarification and justification by Council. We note that the potential social and economic issues and impacts have already been addressed by the determining authority, the Minister for Planning and Public Spaces, through the Gateway Process. Notwithstanding, this letter expands on those issues to address Council's concerns.

We note that recent discussions were held between representatives of the Lebanese Muslim Association (LMA) and Council's Planning staff. We understand that, as a consequence of this discussion, the required action outlined above can be adequately addressed as a separate addendum and is not dependent on the provision of additional economic modelling. The outstanding tasks are predominantly questions relating to social impact and public policy, which are addressed as follows.

ISSUE 1: JUSTIFICATION FOR THE PROPOSED USE WITH REGARDS TO CONFLICT WITH STRATEGIC POLICY OBJECTIVES TO PROTECT INDUSTRIAL LAND.

The key reasons the proposed use is justified, despite conflict with objective 23 of the South District Plan, are summarised as follows:

- The site-specific context in that the subject site is isolated from the surrounding industrial precinct. It is the only industrial site principally accessed from Boorea Avenue (an otherwise residential street) and is physically separated from the industrial areas to the north by the Cox's Creek waterway. It is also located adjacent to numerous non-industrial services and facilities which form part of the envisaged community hub. This incorporates the Lakemba Mosque; the Lebanese Muslim Association offices, services and classes; and, an educational facility.
- The great number of other strategic policy objectives that the Planning Proposal strongly achieves.
- The Planning Proposal has already been assessed by the then Department of Planning and Environment and the Minister for Planning, concluding that the social and economic benefits resulting from the proposal, outweigh any strategic intention to safeguard Industrial and Urban Services Land.
- The previously submitted Economic Impact Statement prepared by MacroPlan Dimasi demonstrates an adequate supply of Industrial land (i.e. Issue 2), which has already been accepted by Council as addressed. This means that the strategic intention to provide adequate industrial land in the area does not hinge on the provision of these services on the subject site.

The above points are discussed in greater detail below.

Site Specific Context

The subject site is isolated from all other industrially zoned land in the area. It is the only industrial property with vehicular and pedestrian access from Boorea Avenue, with no alternative vehicular access option from other streets. Boorea Avenue is a residential street which defines the character and interface of the site. There is a clearly defined industrial precinct which encompasses the properties that directly

adjoin the site to the east. These properties all front, and are accessed by, Frazer Street. The industrial lands to the north are clearly demarcated from the site by Coxs Creek channel and their orientation to Punchbowl Road. Image 1 illustrates the context of the area.



IMAGE 1 | PRECINCT MAP WITH THE MIX OF LAND USES AND THE SITE OUTLINED IN YELLOW.

Due to this physical isolation of the Site, allowing an additional use at the Site that is more compatible with the surrounding residential and community hub context, is an improved planning outcome that also provides greater social and economic benefits.

Achievement of Strategic Objectives

A table outlining the key strategic objectives met by the Planning Proposal is provided as Attachment 1. It demonstrates that the key social and economic objectives met by the Planning Proposal are significantly greater than the potential consequences of adding a site-specific residential use to the proposed site.

We draw attention to the letter dated 20 December 2018 which accompanied the Gateway Determination to Council, from the then the Minister for Planning, to the General Manager of Canterbury-Bankstown Council. This letter stated:

"...although the District Plan contains important principles around the safeguarding of Industrial and Urban Services land, I have also considered the social and economic benefits of this proposal.

...The subject site provides an opportunity to enhance and support a cultural hub with multifunctional and intergenerational spaces and provides seniors housing which will be required for an aging population and provide new employment opportunities. This is consistent with District Plan priorities that focus on the need for stronger communities by encouraging social connectors, housing diversity and walkability and creating new employment opportunities".

The issuing of Gateway Approval and the above extracts clearly demonstrate that the Department is satisfied that the potential conflict with strategic objectives relating to the safeguarding of industrial land are justified and outweighed by the myriad of benefits associated with the proposal.

Current Industrial Land Supply

The primary consideration for Strategic Objective 23 is that industrial land be planned to ensure that there will be sufficient industrial lands to meet future demand. Council has already determined that the Economic Impact Statement (EIS) as submitted, has adequately addressed the following requirement:

An understanding of whether the Canterbury Bankstown LGA has sufficient industrial land supply to meet future demand and so demonstrate that the site under its current use could be surplus to requirements

This EIS found that the Canterbury Bankstown LGA has sufficient industrial land supply to meet future demand and so demonstrated that exclusion of the subject land's allocation as industrial would have a minor impact on future supply, while the impact of the Planning Proposal would be nominal. This means that the strategic intention to provide adequate industrial land in the area does not hinge on the

provision of these services on the subject site. The realisation of a residential care facility on the Site achieves numerous other strategic objectives without adversely impacting on the intent of strategic objectives relating to retention of industrial land.

ISSUE 3 | COMPARISON BETWEEN THE WIDER SOCIAL BENEFITS OF THE PROPOSED USE OVER THE EXISTING INDUSTRIAL USE ON SITE.

The existing use of the site is understood to be a light industrial use, which currently employs a maximum of two people. It has been operating in this manner for several years. The following points highlight the greater social benefit of the proposed additional use as opposed to the existing use:

1. Council has stated it is satisfied with the previously submitted EIS, which demonstrated that the Canterbury Bankstown LGA has sufficient industrial land supply to meet future demand and that impacts of the Planning Proposal in terms of supply, will be nominal in that regard.
2. The broader employment context of the proposal is telling; the existing use employs two people currently, whereas the proposal will employ approximately 120 staff.
3. The proposed site will provide an additional 112 residential care beds to the area. The area has a projected short fall of 434 aged care spaces by 2021.
4. Important to the wider social context, the aged care beds will provide for additional cultural diversity within the residential care sector in the area.
5. The co-location of the residential care facility with the surrounding facilities and services is integral to the benefits that can be realised across the 'hub' as a whole.



IMAGE 2 | THE 'COMMUNITY HUB' ILLUSTRATING THE CO-LOCATION OF LAND USES.

Considering the benefits of retaining the existing use compared to the potential benefits of the proposed residential care facility, it is difficult to see any merit in retention of the current operation based on social impact.

ISSUE 4 | CONSIDERATION OF ALTERNATIVE SITES AND WHY THIS SITE IS REQUIRED.

We understand that residential care facilities are currently permissible within residential-zoned land within the Local Government Area. Similar to the arguments raised in Issue 2, the intention of providing a residential care facility on the subject site is integral to the broader vision of creating a strong community hub of co-located services.

As demonstrated in the image above, the proposed residential care facility forms part of a 'community hub' along with services such as the Lakemba Mosque; LMA Offices and Cultural Centre and a school. Provision of the residential care services in

another location thwarts the intended outcome of a precinct with co-located educational and cultural services. This intention is directly in line with The Greater Sydney Region Plan, A Metropolis of Three Cities – Strategy 7.1, which states:

Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by:

...

- *co-locating schools, health, aged care, sporting and cultural facilities...*

The benefits of co-locating these services include the following:

- Easy physical connection between those needing care and any spiritual requirements that can be serviced by proximity to the Mosque.
- Ability for families that use the Mosque or Community services, to regularly visit family members or friends within the residential care facility.
- Ability for services and programs between the cultural institution, school and residential care facility to be regularly provided.

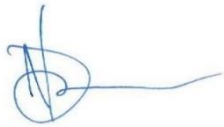
Given the residential nature of Boorea Avenue and an understanding that there is enough land elsewhere to accommodate industrial and urban services, consideration of alternative sites results in no greater outcome and misses the opportunity to realise the benefits of co-location.

In summary, this letter reconfirms that there is an adequate supply of industrial land within the Canterbury-Bankstown and that the alternative proposed use of the site is supported by the Department of Planning, Industry and Environment (then the Department of Planning and Environment). The site is not optimally located to support its current industrial use. The proposed use as a Residential Care Facility will provide a significant increase in employment compared with the existing industrial use. The site is located adjacent to other buildings serving the local community and the proposed use would integrate with them in a unified community hub, in a way that another remote site would not achieve.

We trust that this submission assists the Council's assessment of the Planning Proposal. Please do not hesitate to contact the undersigned should you wish to discuss anything further.

Yours sincerely

WILLANA URBAN PTY LTD



NICHOLAS DOWMAN
SENIOR PROJECT PLANNER

Attachment 1 | Key Strategic Objectives met by the Planning Proposal

ATTACHMENT 1 | KEY STRATEGIC OBJECTIVES MET BY THE PLANNING PROPOSAL

TABLE 1 | THE SOUTH DISTRICT PLAN STRATEGIC OBJECTIVES

PLANNING PRIORITY	OBJECTIVE	PROJECT CONTRIBUTION
Planning Priority 3 Providing services and social infrastructure to meet people's changing needs	Objective 6 Services and infrastructure meet communities' changing needs.	<p>The care facility will provide an integral service to meet the community's changing needs. The South District Plan states that there will be: <i>An 85 percent proportional increase in people aged 85 and over and a 57 per cent increase in the 65–84 age group is expected by 2036. Canterbury-Bankstown Local Government Area will see the highest growth in older people, with 35,900 additional people aged 65 or over.</i></p> <p>As a consequence, the demand for housing for seniors will only increase. As the South District Plan seeks to deliver social infrastructure that reflects the needs of the community now and in the future, it is important that such housing is provided.</p> <p>The proposed employment opportunities are both significant to the community and critical in responding to the religious requirements of care of Muslims. For example, male residents requiring male staff and female residents requiring female staff. Given the locality adjacent to the Mosque, there will be a ready labour market to meet this religious imperative.</p>

PLANNING PRIORITY	OBJECTIVE	PROJECT CONTRIBUTION
Planning Priority 4 Fostering healthy, creative, culturally rich and socially connected communities	Objective 7 Communities are healthy, resilient and socially connected. Objective 8 Greater Sydney's communities are culturally rich with diverse neighbourhoods.	The South District Plan understands that <i>housing has a dual social and economic role across Greater Sydney. Communities require housing that meets changing demographic needs over time and that provides stability.</i> The proposed residential care facility directly responds to the critical importance of providing a diversity of housing across Greater Sydney. The provision of aged care housing will assist the South District in terms of its responsibility to provide diverse and affordable housing for the community.
Planning Priority 6 Creating and renewing great places and local centres, and respecting the District's heritage	Objective 12 Great Places that bring people together.	The proposed residential care facility will be a driving force of renewal within the context of the intended community hub. The complementary land uses within the community hub have been illustrated. The benefits derived from being in close proximity have been well documented in the Plan and explained in this letter. These uses will provide a strong interface between the public/private realms and ensure that the area is inclusive of people of all ages and abilities. Such a community hub is capable of providing authentic opportunities for social interaction and connection.
Planning Priority 10 Retaining and managing industrial and urban services land.	Objective 23 Industrial and urban services land is planned, retained and managed.	Rationale for the addition of residential care facility is discussed in length within the submitted letter. The proposal retains all industrial uses on the site and the current IN2 Light Industrial Zoning. The addition of residential care facility provides significant job opportunities in close proximity to

PLANNING PRIORITY	OBJECTIVE	PROJECT CONTRIBUTION
		residential areas and will not impact on the function of surrounding industrial given the site-specific context.
Planning Priority 16 Delivering high quality open space.	Objective 31 Public open space is accessible, protected and enhanced.	The community hub will see an increase in the provision and quality of open space throughout the local area by providing landscaped area to the west of the site, adjacent to Lakemba Mosque.

TABLE 2 | THE GREATER SYDNEY REGION PLAN'S STRATEGIC OBJECTIVES

OBJECTIVE	STRATEGY	PROJECT CONTRIBUTION
A COLLABORATIVE CITY.		
Objective 5 Benefits of growth realised by collaboration of governments, community and business	.	The LMA is a community organisation that seeks to collaborate to ensure that the varied needs of the community can be met
A CITY FOR PEOPLE		
Objective 6 Services and infrastructure meet communities' changing needs.	Strategy 6.1 Deliver social infrastructure that reflects the needs of the community now and in the future. Strategy 6.2	The proposed additional land use will make it easier for people to access health services in a well-located care facility in close proximity to a range of other social and religious services. This will enable people of varied ages and health to engage actively through the opportunities for participation in the associated social and cultural context of the proposed community hub.

OBJECTIVE	STRATEGY	PROJECT CONTRIBUTION
	Optimise the use of available public land for social infrastructure.	
Objective 7 Communities are healthy, resilient and socially connected	Strategy 7.1 Deliver healthy, safe and inclusive places for people of all ages and abilities that support active, resilient and socially connected communities by: <ul style="list-style-type: none"> ▪ providing walkable places at a human scale with active street life. ▪ prioritising opportunities for people to walk, cycle and use public transport. ▪ co-locating schools, health, aged care, sporting and cultural facilities. 	The Proposal provides meaningful engagement with the local community that is specific to the Lakemba area. The Greater Sydney Region Plan's strategy regarding 'co-locating schools, health, aged care, sporting and cultural facilities' will be directly achieved through the provision of this aged care facility that will be co-located adjacent to schools and cultural facilities such as the Lakemba Mosque. This will promote a healthier, active and resilient community.
HOUSING THE CITY		
Objective 10 Greater housing supply		The proposed residential care facility directly responds to the critical importance of providing a diversity of housing across Greater Sydney.
Objective 11	Strategy 11.1	The proposed residential care facility directly responds to the critical importance of providing a diversity of housing across Greater Sydney. The

OBJECTIVE	STRATEGY	PROJECT CONTRIBUTION
Housing is more diverse and affordable	<p>Prepare Affordable Rental Housing Target Schemes, following development of implementation arrangements.</p> <p>Strategy 11.2 State agencies, when disposing or developing surplus land for residential or mixed-use projects include, where viable, a range of initiatives to address housing diversity and/or affordable rental housing.</p>	aging demographic shift that Sydney is currently experiencing is leading to greater pressure for access to health services and aged care residential accommodation.

OBJECTIVE	STRATEGY	PROJECT CONTRIBUTION
A CITY OF GREAT PLACES		
Objective 12 Great places that bring people together	Strategy 12.1 ...Integrating social infrastructure to support social connections and provide a community hub recognising and celebrating the character of a place and its people...	Social connectors are a major element of the characteristics of each, local identity and the LMA seeks to provide a distinctive community hub that reflects the Lakemba social and cultural context.
A WELL CONNECTED CITY		
Objective 14 A Metropolis of Three Cities –integrated land use and transport creates walkable and 30minute cities	Strategy 14.1 Integrate land use and transport plans to deliver the 30-minute city.	The Site is well-located being close to accessible public transport options, residential areas and local services.
Objective 15 The Eastern, GPOP and Western Economic Corridors are better connected and more competitive.	Strategy 15.3 Co-locate health, education, social and community facilities in strategic centres along the economic corridors.	The proposed residential care facility will be co-located adjacent to schools and cultural facilities such as the Lakemba Mosque. It is the intention of the LMA to create a community hub. Significant socio-cultural benefits would be lost should the facility not be provided adjoining these other land uses.

OBJECTIVE	STRATEGY	PROJECT CONTRIBUTION
JOBS AND SKILLS FOR THE CITY		
Objective 23 Industrial and urban services land is planned, retained and managed		Rationale for the addition of residential care facility is discussed in length within the submitted letter. The proposal retains all industrial uses on the site and the current IN2 Light Industrial Zoning. The addition of residential care facility provides significant job opportunities in close proximity to residential areas and will not impact on the function of surrounding industrial given the site-specific context.