

Michael Woodland Consulting Pty Ltd

Independent review

Planning proposal

2-14 Tennyson Road, Gladesville

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prepared for the City of Ryde Council

February 2014

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# 1. Executive summary

## Purpose of the report

Michael Woodland Consulting Pty Ltd has been engaged by the City of Ryde Council (Council) to undertake an independent review of a planning proposal (the proposal) at 2-14 Tennyson Road, Gladesville (the site). The proposal seeks to rezone the land from an industrial zoning to a mixed-use zone to enable retail, residential and seniors living uses on the site.

This report undertakes a comprehensive analysis of the proposal under the relevant planning legislation and guidelines and makes recommendations to Council on whether it should proceed to a Gateway determination.

## The site

The site is located on the edge of the Gladesville Town Centre within the Gladesville Industrial Area within the Ryde local government area (LGA). The site is located to the south of Victoria Road, 100 metres south of the intersection of Tennyson and Victoria Roads, Gladesville.

The site comprises of 2 adjoining parcels of land known as 2-12 Tennyson Road (Lot 2 DP 549570) and 14 Tennyson Road (Lot 1 DP 549570) under separate ownership. The site includes a former quarry and is currently used for warehousing/office uses. The total site area is 2.2 ha.

The site is currently zoned IN2 Light Industrial under the provisions of the *Ryde Local Environmental Plan 2010* (LEP 2010). Council has finalised the *Draft Ryde Local Environmental Plan 2011* (draft LEP) for the LGA, which is currently with the Department of Planning and Infrastructure (DP&I) for consideration.

## The proposal

On 12 March 2013, Council resolved that a planning proposal be accepted and considered for the site. The proposal seeks to:

- Rezone the land from IN2 Light Industrial land uses to B4 Mixed use, with a concept plan for a mixed use development;
- Set the maximum height of buildings from 10 metres to an RL control that varies across the site and permits up to 8 storeys and 26 metres; and
- Increase the maximum floor space ratio from 1:1 to 2.5:1 for part of the site and 1.5:1 for the remainder.

The proposal includes specialised reports, draft Local Environmental Plan (LEP) and Development Control Plan (DCP) for the site. It includes a preferred concept plan across both sites consisting of:

- 404 residential units (including approximately 269 residential units, 135 seniors living units and an assisted living facility of 3,300m<sup>2</sup>);
- 2 levels of basement parking for 670 car spaces, loading and unloading areas;
- 2 options for shared or separate vehicular access to both sites from Tennyson Road;
- podium level with 5,800m<sup>2</sup> retail space (including a 4,000m<sup>2</sup> supermarket);
- childcare centre, approx 600m<sup>2</sup> of commercial uses; open space and landscaping.

In summary, the applicant argues the proposal should be supported as it is: consistent with relevant strategic planning policies; well serviced by public transport and services; provides additional employment to match Ryde's employment profile; and provides improved public domain and open space.

### Key issues

This report reviewed the proposal, including the specialist reports and included consultation with senior Council and the DP&I staff. The report considers that the key issues relating to the proposal are as follows:

- Government's strategic planning framework and s117 Directions
- Strategic direction for industrial lands in the Ryde LGA
- Relationship to the Gladesville Town Centre and LEP
- Proposed retail uses on the site
- Appropriateness of high density residential/mixed use
- Potential development outcomes including traffic impacts and built form controls

#### *Government's strategic planning framework and S117 Directions*

The Draft Metropolitan Strategy encourages new major residential development within centres, to make use of existing infrastructure and encourage diverse and active centres.

This policy direction both supports centre development and protects the existing character of established low density residential areas by limiting the adverse impacts including height, bulk and scale and traffic issues.

There are 2 fundamental issues to consider in relation to this proposal:

- Should the current industrial land be retained for industrial and employment purposes?
- If not, is a mixed use zoning to allow a major residential and retail development up to 8 storeys with floor space ratios of up to 2.5:1 appropriate in this location?

First, both former and current State Government policies acknowledge the need to protect industrial and employment lands. The Draft Strategy accepts that industrial land, particularly in established urban areas can be under pressure to be rezoned for other uses. In response, it provides a checklist for planning authorities to consider when dealing with a rezoning of industrial land. An assessment against the checklist in this report concluded the proposal does not fully meet the criteria.

Second, major residential and mixed use development is generally encouraged to be located within existing centres and strategic corridors to utilise existing infrastructure and reduce impacts on surrounding established residential areas.

Further, the Draft Inner North Subregional Strategy states (our emphasis):

*... In view of continued demand for Employment Lands, conversion of existing Employment Lands within the subregion should be highly restricted and existing precincts (Artarmon, Lane Cove West, East Chatswood, Gore Cove, West Ryde, **Gladesville** and the former ADI site) **should be retained**...* (Draft Inner North Subregional Strategy; page 27)

Finally, the proposal is located outside of the Gladesville Town Centre, which is identified as a Village in the Ryde LGA centre hierarchy and is considered to be inconsistent with the policies of protecting existing industrial/employment lands and suitable location of future major mixed use development.

In this regard, the proposal is considered to be inconsistent with the objectives and provisions of Section 117 Direction 1.1 – Business and Industrial zones as it:

- does not protect industrial land;
- is located outside of an identified centre; and
- is not considered to be consistent with an identified strategy.

#### *Strategic direction for industrial land in the Ryde LGA*

The proposal is considered to be inconsistent with Council's strategic direction for industrial lands and the location of major mixed-use retail and residential development on this site.

There is 27.93ha (Gladesville and West Ryde industrial areas excluding waterfront industrial) of industrial land remaining in the Ryde, representing only 2.78% of all employment land in the LGA. The proposal (if rezoned to a mixed use zone) would see the erosion of part of the last remaining industrial land in the Ryde LGA. In relation to industrial land, Council's adopted Local Planning Strategy states (our emphasis):

*...The overall demand for industrial uses is likely to reduce then stabilise. However, the **retention of the City's industrial land is vital**, as these areas continue to provide for a range of industrial activities that meet local and regional needs.*

*Such areas also provide premises that are often affordable to purchase or rent and such spaces support emerging businesses. Areas in the City that also provide this opportunity are along Victoria Road adjoining the edge of town centres...* (City of Ryde Local Planning Study Employment; page 7-25)

The Gladesville Industrial Area is recognised by state and local planning studies & reports as a vital cluster of industrial land that provides valuable urban services to the LGA and region. Industrial lands and uses play an important part in the economic well being of the Ryde LGA. The Gladesville Industrial Area is considered to provide a valuable cluster of automotive and construction based uses that service both the local and broader community.

In addition, recent demographic analysis indicates the nature of industrial lands is changing with a more educated and skilled workforce to better reflect the employment profile of the City of Ryde and is highly valuable to the economy of LGA and should be retained for future employment uses.

### *Supporting the Gladesville Town Centre*

In 2010, the Gladesville Town Centre and Victoria Corridor LEP was made to revitalise the Gladesville village and encourage employment uses along the Victoria Road corridor.

The LEP followed an extensive master planning exercise and community consultation process. The LEP adopted fundamental planning principles of supporting new dwellings and employment in identified centres. Since that time significant development activity is occurring in the Gladesville area. The site was not included in this planning work, remaining as industrial land, which is still considered appropriate.

The proposal indicates that if approved the retail impact on the Gladesville Town Centre will be in the range of \$6.6m or 6.1% loss of trade in 2016. Further specialist advice is required to fully address this issue. However, following the recent planning work to re-invigorate the Town Centre and Corridor through the Gladesville LEP, Council should seriously consider the potential impact on this centre and others in the locality.

### *Impacts on the surrounding local neighbourhood*

The site is not considered to be an appropriate location for high density residential development given its interface with the low density residential locality, in particular the likely traffic impacts on the surrounding road network. The proposed built form controls are not considered to enable future buildings to transition to the low density scale of the surrounding residential areas, in particular in relation to height controls. Given the recommendations in the this report, particularly related to strategic planning and traffic grounds, a detailed consideration of the proposed controls in the Draft DCP provided by the applicant was not undertaken.

## **Council can meet its residential and employment targets without eroding industrial land**

The Local Planning Strategy indicates that Council can deliver its housing and employment targets set by the State Government without rezoning this site. The Strategy also recommends concentrating housing and employment within Macquarie Park and its Town Centres, in particular large apartment buildings and mixed use developments. The study identifies up to 1,100 new dwellings within the Gladesville Town Centre.

Council has recently undertaken further analysis of future dwelling projections for the LGA, which indicate a significant increase in previous estimates. The Draft Subregional Strategy set a target of 12,000 additional dwellings in the LGA by 2031. The Local Strategy estimated a total of 15,751 additional dwellings between 2004-2031. A review of dwelling numbers has seen this estimate increase to 34,467 during this period, with 27,753 additional dwellings between 2014 and 2031.



## Conclusion

The review concludes that the proposal is inconsistent with Council's strategic direction for the site and is likely to result in adverse impacts on the immediate locality.

However, given the difficulties faced by some landowners of industrial sites, it is appropriate for Council to continue to discuss alternative employment uses as part of a broader study of industrial lands as recommended in the Ryde Local Planning Strategy.

This work should build on the additional uses Council has proposed in the Draft LEP 2011 and subsequent *housekeeping* draft LEP for the IN2 Light Industrial zone to encourage a wider range of employment uses. These discussions should also take into account the recent demographic and economic data and include consultation with landowners, community and industry groups.

## Recommendation

The report makes the following recommendation:

- A. That the planning proposal for 2-14 Tennyson Road, Gladesville not proceed to a gateway determination for the following reasons:
  1. The proposal is inconsistent with strategic direction of the Ryde Local Planning Strategy 2010, Ryde Draft LEP 2011 and Draft Subregional Strategy in relation to retention of industrial lands.
  2. The proposal is inconsistent with the Draft Metropolitan Strategy and does not meet the criteria under the Industrial Lands Strategic Assessment Checklist for rezoning of existing industrial land to other uses.
  3. The proposal is inconsistent with s117 Direction 1.1 – Business and Industrial zones and 7.1 – Implementation of the Metropolitan Plan for Sydney 2036.
  4. The proposal is likely to lead to adverse impacts on the amenity of the surrounding locality, particularly relating to traffic impacts on the surrounding road network.
  5. The proposed built form controls are generally not considered appropriate in this locality due to the impacts on the adjoining low density residential areas.
- B. That Council give further consideration to additional employment uses specifically for the site in addition to the uses identified in the Draft LEP 2011 in consultation with the landowners.
- C. That Council undertake a further study of the industrial areas **within the Ryde LGA to develop strategies and recommendations to maintain these areas as viable employment lands** in accordance with Recommendation 7.2 of the Ryde Local Planning Strategy in consultation with landowners, the community and relevant industry groups.

## 2. Introduction

Michael Woodland Consulting Pty Ltd has been engaged by the City of Ryde Council (Council) to undertake an independent review of a planning proposal (the proposal) at 2-14 Tennyson Road, Gladesville (the site). The proposal seeks to rezone the land from an industrial zoning to a mixed-use zone to enable retail, commercial, residential and seniors living uses on the site.

This report provides an independent planning consideration of the proposal, which is seeking a Gateway determination to proceed to the next stage of the planning process to public exhibition. This report undertakes a comprehensive analysis of the proposal under the relevant planning legislation and guidelines and makes recommendations to Council on whether it should proceed to a Gateway determination.

The site is located on the edge of the Gladesville Town Centre within the Gladesville Industrial Area, one of 2 remaining industrial areas within the Ryde local government area (LGA). The site is located to the south of Victoria Road, approximately 100 metres south of the intersection of Tennyson Road and Victoria Road, Gladesville.

The site comprises of 2 adjoining parcels of land known as 2-12 Tennyson Road (Lot 2 DP 549570) and 14 Tennyson Road (Lot 1 DP 549570) under separate ownership. The site includes a former quarry and is currently used for warehousing/office uses. The total site area is 2.2 ha.

The site is currently zoned IN2 Light Industrial under the provisions of the *Ryde Local Environmental Plan 2010* (LEP 2010). Council has finalised the *Draft Ryde Local Environmental Plan 2011* (draft LEP) for the LGA, which is currently with the DP&I for consideration.

On 12 March 2013, (following a community workshop) Council resolved that a planning proposal be accepted and considered for the site. The proposal seeks to rezone land to B4 mixed use and allowing a mixed use development; set maximum height controls up to 8 storeys and increase the FSR to 2.5:1 and 1.5:1 across the site.

This report concludes that the proposal should not be supported due to the loss of industrial and employment lands and resultant impacts on the surrounding area in terms of amenity and traffic issues. The proposal (if rezoned to a mixed use zone) results in the erosion of the last remaining industrial land in Ryde.

The Gladesville Industrial Area serves as an important cluster of industrial land and is considered to provide valuable employment uses and urban services to the LGA and region.

### 3. Planning proposals and gateway process

In 2009, the State Government made changes to how land is rezoned across NSW.

The Government introduced a Gateway Process to provide greater certainty in the rezoning process. Through a Gateway determination, the Minister for Planning (or delegate) determines which planning proposals will proceed to the next stage in the planning process. This allows councils and agencies to provide early input and tailors the level of assessment needed to match the complexity of the proposed rezoning.

The planning proposal is the first stage in the LEP rezoning process. The planning proposal sets out the intended outcomes for a future rezoning on the land and provides strategic justification for making the plan. A council, landowner or developer who wishes to rezone a particular site may make a planning proposal.

However, only the Relevant Planning Authority (RPA) (in most cases council) can forward a planning proposal for a Gateway Determination. The RPA is responsible for ensuring that the planning proposal has sufficient information to enable a Gateway determination to allow the proposal to proceed to the next stage to the public consultation.

In November 2012, the Government introduced review mechanisms to this process – pre-Gateway and Gateway Reviews. This allows a proponent to seek a review should the council not support a planning proposal (or not make a decision within 90 days), or review the decision of the Gateway determination.

A Joint Regional Planning Panel and/or the NSW Planning Assessment Commission informs these reviews.

## 4. The site

The site is located within the Gladesville Industrial Area on the southern side of Victoria Road, Gladesville. The site is located between the existing industrial land that fronts Victoria Road and low density residential land to the east, west and south. The Ryde Aquatic Leisure Centre is located to the west of the site. The site is well located to the Victoria Road Corridor and in close proximity to the Gladesville Town Centre (Figures 1 & 2).

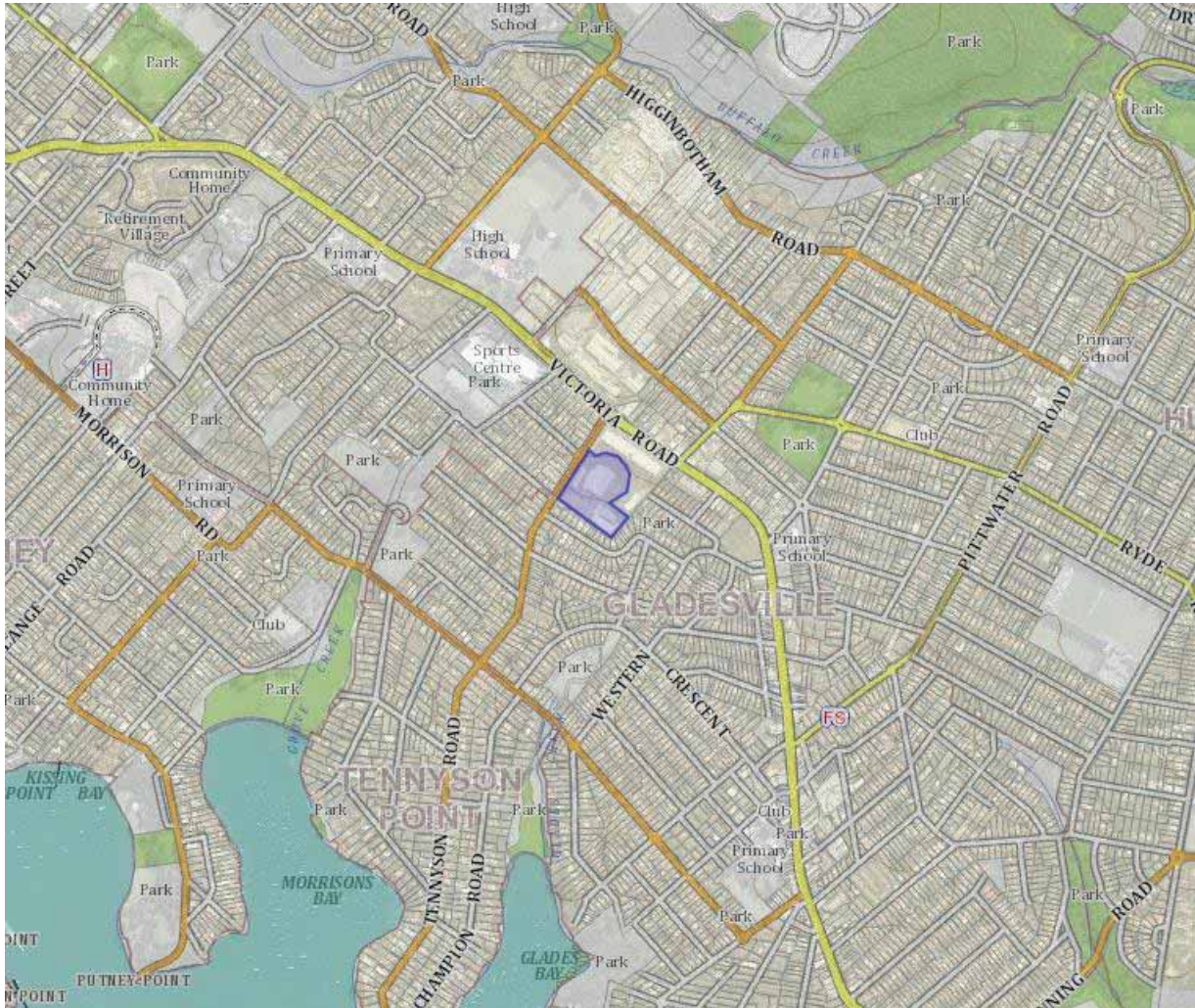


Figure 1: Local context (Source: LPI SIX viewer)



Figure 2: The site (Source: LPI SIX viewer)

## 4.1 Site description

The site is located to the south of Victoria Road, approximately 100 metres south of the intersection of Tennyson Road and Victoria Road, Gladesville. The site comprises of 2 adjoining parcels of land known as 2-12 Tennyson Road (Lot 2 DP 549570) and 14 Tennyson Road (Lot 1 DP 549570), described as Sites A & B respectively under separate ownership. The total site area as advised by the applicant is 2.2 ha (Figure 3).



Figure 3: The total site showing site A and B (Source: Mecone)

Site A is 1.4 ha in size and is a former quarry site, characterised by an existing circular shaped cutting, with a change in level of approx 13 metres from the adjoining site to the north at Victoria Road. The site is occupied by a warehouse building located in the centre of the site with a 2-storey office building fronting Tennyson Road (Figures 4, 5 & 6). Vehicular access is gained from Tennyson Road.



Figure 4: Existing warehouse located on Site A looking south  
(Source: Michael Woodland 2013)



Figure 5: Rear of 2 storey office building on Site A  
(Source: Michael Woodland 2013)



Figure 6: Site A frontage along Tennyson Road  
(Source: Michael Woodland 2013)

Site B is 0.8 ha in size and immediately adjoins Site A to the south. An existing 2 storey industrial building currently used as an office and warehouse occupies the site. The site gains access from Tennyson Road (Figure 7).



Figure 7: Site A and Site B frontage along Tennyson Road  
(Source: Michael Woodland 2013)

## 4.2 Surrounding development

The site is part of the Gladesville Industrial Area bisected by Victoria Road. To the immediate north and north-east of the site is characterised by large commercial/industrial buildings, known as the Dexus Development. This development contains office and warehouse facilities, with its main frontage to Victoria Road and vehicular from Tennyson Road to the north of the site (Figure 8).



Figure 8: Adjoining development to the north featuring the rear of the Dexus Building (Source: Michael Woodland 2013)

The land to the east, west and south of the site is characterised by low density 1 - 2 storey residential uses (Figures 9 -12).



Figure 9: Adjoining dwellings in Brereton Street looking north (Source: Michael Woodland 2013)



Figure 10: Residential villas opposite the site on Tennyson Road (Source: Michael Woodland 2013)



Figure 11: Existing residential dwellings in Brereton Street (Source: Michael Woodland 2013)



Figure 12: Existing residential dwellings in Brereton Street (Source: Michael Woodland 2013)



## 5. Strategic planning context

The strategic planning context and related planning documents include:

- Draft Metropolitan Strategy for Sydney 2031 / Metropolitan Plan 2036
- NSW Transport Long term Masterplan
- Draft Inner North Subregional Strategy
- Employment Lands Development Program
- Ryde Local Planning Strategy 2010

### 5.1. Draft Metropolitan Strategy for Sydney 2031 / Metropolitan Plan 2036

The current Draft Metropolitan Strategy for Sydney and existing the Metropolitan Plan both provide key strategic direction for the growth of Sydney as a strong global city that provides benefits to NSW as well functioning as a local liveable city for its residents, businesses and visitors.

Both Strategies recognise the need to protect existing industrial lands and to focus future development around identified centres – which are the 2 fundamental issues central to this proposal.

The existing Metropolitan Plan and Subregional Strategy categorised the site as employment uses to be retained recommending its protection and continued use for employment purposes. The draft Strategy also recognises the importance of industrial/employment lands but also seeks to provide further certainty for investment in the city, providing housing choice and protecting the amenity and sustainability of existing areas.

The draft Strategy has a number of objectives, which are then supplemented by key policy directions and actions. The most relevant policy directions to the proposal are Objectives 13 and 15 relating to industrial land as follows:

*Objective 13: Productivity and Prosperity: Provide a well located supply of industrial lands* – recognises the importance of industrial lands as well as the pressure faced by land within existing areas to be rezoned for other uses. It provides an Industrial Lands Strategic Assessment Checklist for proposals seeking to rezone existing industrial lands in these circumstances.

*Objective 15: Productivity and Prosperity: Provide for a good supply of retail space* – supports existing centres as the primary location of retail, at a scale reflecting the level of public transport accessibility. It supports clusters of bulky goods/warehouse outlets in clusters and seeks to limit retail uses in industrial areas to support industrial uses.

Other objectives and directions relating to retail and residential development are detailed below:

*Objective 2: Balanced Growth* - seeks to strengthen and grow Sydney's Centres to support business, provide affordable housing and utilise existing infrastructure.

Objective 5, 7 and 8: *a Liveable City* - promotes a proactive approach to housing delivery by providing new housing with greater choice linked to existing infrastructure and supported by existing and new centres.

Objectives 24 and 26: *Accessibility and connectivity* – promote future employment and housing development to be integrated with transport corridors to promote sustainable transport choices and improve connectivity for existing and planned centres.

## 5.2. NSW Transport Long Term Masterplan

The NSW Transport Long Term Masterplan outlines a number of strategies to integrate transport and land use planning. It identifies Victoria Road as of the most constrained strategic transport corridors in the network (Figure 15).

The Masterplan outlines a number of long-term bus priority measures to improve this corridor as well as a commitment to investigate the corridor for potential bus rapid transit (BRT) and light rail.

The Masterplan also identifies this corridor for potential future long-term urban renewal where increased population could support improved transport services.



Figure 15: Parramatta to the CBD via Ryde constrained corridor (Source TfNSW)

### 5.3. Draft Inner North Subregional Strategy

#### *Employment lands*

The Draft Inner North Subregional Strategy was prepared to support the previous Metropolitan Plan. The Strategy sets a target of 21,000 new jobs to be created within Ryde LGA by 2031. The Strategy also identifies Strategic Employment Lands in the sub region, noting there is a relatively limited supply with a total of 194 hectares of zoned land, concentrated mainly within Willoughby (94 hectares) and Lane Cove (63 hectares) LGAs.

The Strategy further identifies 7 Employment Land Precincts of strategic importance and worthy of retention for industrial uses, including the site as part of the Gladesville Industrial Area. It identifies this area as follows:

*Gladesville (Local Industry) is located along Victoria Road and is a suburban industrial area (23 hectares) servicing the local population, including automotive businesses and trade supplies (Draft Inner North Subregional Strategy; page 26).*

The Strategy also notes that the sub-region is well established with scarce areas of under utilised land. It observes that the sub-region has experienced one of the highest rates of rezonings of employment lands to other uses, namely changes at Macquarie Park from an industrial area to a specialised centre and the Meadowbank area.

The Strategy recommends that due to demand for local services and the changing nature of employment lands that further conversion of existing employment lands should be highly restricted and existing precincts (including Gladesville Industrial Area) be retained as detailed below:

*... In view of continued demand for Employment Lands, conversion of existing Employment Lands within the subregion should be highly restricted and existing precincts (Artarmon, Lane Cove West, East Chatswood, Gore Cove, West Ryde, Gladesville and the former ADI site) should be retained...(Draft Inner North Subregional Strategy; page 27).*

#### *Housing*

The Strategy sets a housing target of 30,000 additional new dwellings by 2031 for the sub region, with an additional 12,000 new dwellings within the Ryde LGA. Following the direction from the Metropolitan Strategy, residential development is focussed within strategic and local centres and corridors with access to public transport and services.

A key policy is also the renewal of existing centres, including the Gladesville Village and Victoria Road Corridor revitalisation, which resulted in the new LEP for the Town Centre in 2010.

#### *Enterprise Corridor*

The Strategy also identifies Victoria Road as a potential *Enterprise Corridor* for local services and employment. The Strategy envisages that the corridor can include spaces for small firms, retailers and light industrial activities such as auto repairs to support local economic development.

## 5.4. Employment Lands Development Program

The Employment Lands Development Program (ELDP) monitors industrial land supply including strategy-identified land, undeveloped zoned (not serviced) land and undeveloped zoned and serviced land. It is prepared on a regional and sub-regional basis and provides a regional overview, rather than on a site-by-site basis. However, it does identify and monitor the Gladesville Industrial Area, which includes the site.

The program provides an overview of the trends for employment lands across Sydney. In the latest 2011 Update Report, it notes that demand for industrial space in Sydney is expected to grow in the short to medium term. In terms of supply, it notes that the vast majority of employment lands is located within western Sydney, with inadequate stocks of undeveloped and serviced land.

## 5.5. Ryde Local Planning Strategy 2010

The Ryde Local Planning Strategy was prepared to:

- guide the future growth of Ryde through a range of planning initiatives and strategies;
- inform the Draft Ryde LEP 2011; and
- review and respond to directions from the State Government as identified in the Metropolitan Strategy for Sydney and the Draft Inner North Subregional Strategy, particularly relating to housing and employment targets.

The Strategy is informed by a number of comprehensive studies reflecting the structure and direction of the Metropolitan Strategy. The Strategy is underpinned by these studies to achieve the future vision for the City of Ryde. The studies most relevant to this proposal are:

- Centres and Corridors
- Housing
- Employment
- Strategic Directions

In relation to the key issue of industrial lands, the Strategy makes the following relevant comments:

*...The overall demand for industrial uses is likely to reduce then stabilise. However, the retention of the City's industrial land is vital, as these areas continue to provide for a range of industrial activities that meet local and regional needs.*

*Such areas also provide premises that are often affordable to purchase or rent and such spaces support emerging businesses. Areas in the City that also provide this opportunity are along Victoria Road adjoining the edge of town centres...(City of Ryde Local Planning Strategy, Employment ;page 7-25)*

## 5.6. Summary of key strategic policies

In summary, the above policies generally support both the growth of identified centres within the LGA and the retention of existing industrial lands. This strategic planning framework provides for major retail and high density housing to be located in identified centres close to existing public transport and related infrastructure.

The Draft Subregional Strategy specifically identifies the Gladesville Industrial Area (which includes the site) for retention due to its critical role in providing local and regional services. Council's adopted Local Planning Strategy also concludes that the protection of its remaining Industrial Land within the LGA is vital.

The Local Planning Strategy also supports the revitalisation of the Gladesville Town Centre and Victoria Road Corridor for future retail and major development in the locality. The Strategy notes that Council can meet with housing and employment targets and sufficiently address retail demand within identified centres and other specialised locations.

## 6. Statutory planning controls

The site is currently zoned under the provisions of the Ryde Local Environmental Plan (LEP) 2010. The site is also covered by the Ryde Draft LEP 2011, which is currently being finalised by DP&I.

### 6.1. Ryde LEP 2010

The relevant provisions in the Ryde LEP 2010 are zoning and floorspace ratio. There are no height controls for the site under the current LEP.

#### 6.1.1. Land use zoning

The site is zoned IN2 Light Industrial under the Ryde LEP 2010. An extract of the current zoning map is shown in Figure 16 below. The objectives and permissible uses of the IN2 Light Industrial zoning are as follows:

##### 1. Objectives of zone

- To provide a wide range of light industrial, warehouse and related land uses.
- To encourage employment opportunities and to support the viability of centres.
- To minimise any adverse effect of industry on other land uses.
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.
- To support and protect industrial land for industrial uses.
- To enhance the amenity of local areas through better building design, reduced hard-paved surfaces and landscaping.

##### 2. Permitted without consent

*Home occupations*

##### 3. Permitted with consent

*Business identification signs; Car parks; Child care centres; Community facilities; Depots; Industrial retail outlets; Industrial training facilities; Light industries; Neighbourhood shops; Public administration buildings; Pubs; Recreation areas; Research stations; Respite day care centres; Roads; Service stations; Sex services premises; Transport depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres; Waste or resource management facilities; Water recycling facilities*

##### 4. Prohibited

*Any development not specified in item 2 or 3*



Figure 16: Extract from the Ryde LEP 2010 – Zoning Map

### 6.1.2. Floorspace ratio

The Floorspace ratio for the site is 1:1 under the Ryde LEP 2010. An extract of the current Floorspace ratio map is shown in Figure 17 below.



Figure 17: Extract from the Ryde LEP 2010 – FSR Map

## 6.2. Ryde DCP 2010

The Ryde DCP 2010 provides for a number of environmental, engineering, stormwater and waste minimisation controls for the site relating to its industrial use. These controls are generally considered to be more relevant at the development application stage rather than the rezoning process for this site.

The proposal has been forwarded to Council's traffic, engineering and environmental sections to provide comments on the traffic, contamination, geotechnical and stormwater issues.

## 6.3. Ryde Draft LEP 2011

The Ryde Draft LEP 2011 was submitted to the DP&I on 21 March 2013 and is currently being finalised. The Draft LEP maintains the IN2 Light Industrial zoning for the site.

The objectives of this zone have remained largely unchanged from the current LEP 2010. The landuse table has been reviewed to clarify the number of uses prohibited in the zone, which includes residential development.

A number of additional uses are proposed including funeral homes, hardware and building supplies, landscaping material supplies and storage premises. In addition, commercial uses and bulky goods retailing have also been permitted on specific sites fronting the Victoria Road corridor.

The Floorspace ratio controls for the site also remain unchanged at 1:1 for the site. A maximum height control of 10 metres has been introduced considering the typical industrial built form existing and desired in this zone.

Council has also proposed additional uses for the IN2 Light Industrial Zone in a current planning proposal to amend the Draft LEP. These include recreational uses and wholesale supplies to provide further employment opportunities for land in light industrial areas such as this site.



## 7. The proposal

### 7.1. Overview

The proposal is for a standard instrument based LEP and a DCP for the site to enable a mixed use development with the capacity to deliver approx 404 residential units (including seniors living), retail, commercial and community uses. The proposal seeks to rezone the site to a B4 mixed use zone with additional uses to permit high density residential uses up to 8 storeys.

The proposed zoning and controls for the site (if made) would then be reflected in the new Draft LEP for the Ryde LGA. The proposal also includes a site specific DCP for the site to respond to its unique topographical characteristics as a former quarry.

The proposal is also accompanied by a comprehensive architectural study that outlines a number of development options (and preferred Concept Plan) for the site forming the basis and justification for the proposed planning controls across both sites.

### 7.2. Objectives and intended outcomes

The planning proposal states the objectives of the proposal as follows:

- *To encourage employment generation on site that increases the number of employees and provides jobs that better match Ryde's employment profile;*
- *To facilitate redevelopment of the site in a prime location in close proximity to a range of services and public transport options, which is currently being underutilised;*
- *To provide high quality residential development, incorporating a range of*
- *housing types, including seniors housing, for the Ryde and Gladesville locality; and*
- *To provide an innovative village hub with a range of commercial and*
- *retail employment activities which are compatible with the residential uses in the area.*

The planning proposal seeks to achieve the above objectives by allowing the redevelopment of the site as mixed-use development with a range of residential, retail, commercial, and community uses.

In this regard, the intended outcomes of the planning proposal are to:

- *Address the lack of housing availability within the locality;*
- *Provide appropriate services and employment opportunities that suit the resident profile in the area;*
- *Allow for a proposal that will complement and support the existing Gladesville Town Centre; and*
- *Allow for public domain upgrading works.*

### 7.3. Description of the proposal

The proposal seeks to:

- rezone the land from IN2 Light Industrial land uses to B4 Mixed use;
- set the maximum height of buildings from 10 metres to an RL control that varies across the site and permits up to 8 storeys; and
- increase the maximum floor space ratio from 1:1 to 2.5:1 for part of the site and 1.5:1 for the remainder of the site.

The preferred development option involves a consolidated development across both Sites A and B and includes (Figures 13 & 14):

- 2 levels of basement parking for 670 car spaces, loading and unloading areas
- 2 options for shared or separate vehicular access to both sites from Tennyson Road
- podium level with 5,800m<sup>2</sup> retail space (including a 4,000m<sup>2</sup> supermarket)
- childcare centre (300m<sup>2</sup>)
- 600m<sup>2</sup> of non-retail, commercial uses
- 404 residential units (including 135 seniors living units, an assisted living facility of 3,300m<sup>2</sup>)
- public space within the site and associated landscaping

In addition, the applicant has provided the following indicative breakdown for each site:

#### Site A (2–12 Tennyson Road)

- Approximately 269 apartments
- 5,800m<sup>2</sup> of retail/commercial including supermarket, specialty retail and café or similar use
- Childcare centre

#### Site B (14 Tennyson Road)

- Approximately 135 apartments (intended to be seniors living apartments)
- 3,300m<sup>2</sup> of assisted living (ie Residential Aged Care Facility)
- 400m<sup>2</sup> of retail/commercial

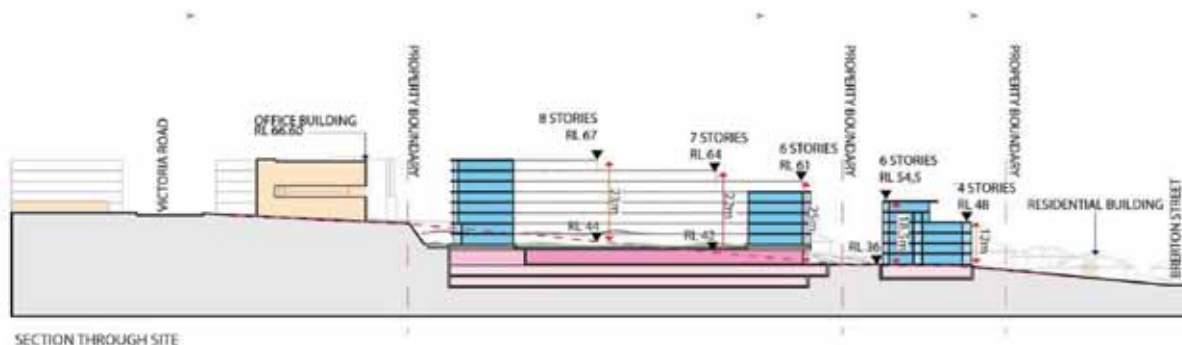


Figure 13: Indicative section of preferred development option (Source: Grimshaw Architects)



Figure 14: Preferred development option (Source: Grimshaw Architects)

#### 7.4. Explanation of provisions

The proposal seeks the mandatory planning controls as required by the standard instrument as outlined in Table 1. The current built form controls for industrial land rely on an FSR control only. These are no current height controls on the site. The proposal seeks new FSR and height controls for the site based on architectural study prepared for the proposal.

The proposal also seeks a number of standard optional provisions and local provisions as a separate LEP for the site. It is noted that a number of these proposed provisions have not been adopted in the Ryde LEP 2010 including architectural roof features. It is noted that all amendments should be made as an amendment to the Ryde LEP 2010 rather than stand alone LEP for the site.

Control	Ryde LEP 2010	Draft Ryde LEP 2011	Proposed controls
Zoning	IN2 – Light Industrial	IN2 – Light Industrial	B4 - Mixed use
Floor space ratio	1:1	1:1	2.5:1 – Site A 1.5:1 – Site B
Height of building	-	10 metres	RL controls / up to 8 storeys / Max 26 metres

Table 1: Proposed LEP provisions

## 7.5. Planning justification and implementation

The applicant's planning justification is largely based on the utilisation of the site to provide additional jobs and housing for the locality than provided by the current industrial uses on the site. The proposal argues that the changing nature of industrial land, employment profile of Ryde LGA justify a mixed development on the site.

The planning justification is supported by a number of specialist reports including the architectural study, economic assessment, traffic assessment and environmental reports. The proposal also addresses the DP&I's Industrial Lands Strategic Assessment checklist, concluding that the proposal is consistent with the Draft Metropolitan Strategy for Sydney. Relevant extracts, summarising the key aspects of the planning justification is provided below:

### *Industrial land assessment*

- *In accordance with the findings of Mecone's Employment and Centres Study 2009 and Hill PDA's economic impact assessment of the area, the following conclusions are made in regards to industrial trends in the Ryde LGA:*
- *Employment generation on industrial land is declining due to rationalisation with advanced technology allowing the same employment functions to be performed with a reduced number of workers;*
- *A comparison between the census data and industrial demand forecast indicates that actual ratio of resident blue collar workers is lower than those identified in the Employment and Centres Study forecasts;*
- *It is acknowledged that the Gladesville Industrial area plays an important role in providing urban support services such as auto repairs, light manufacturing, catering and sporting uses and vital services that support local residents and businesses in the area. However, the subject site is separated from this area with a residential interface and therefore struggles to meet this role;*
- *A certain 'critical mass' is usually considered necessary for successful operation of industrial and commercial uses. The site is segregated from the main Gladesville Industrial Area and is subject to vulnerabilities of a small business base;*
- *It is understood that the existing industrial business on site A (2-12 Tennyson Rd) currently employs 20 staff (refer to Table 8 above). Compared to the employment rate benchmark of 1 job per 80m<sup>2</sup> of leasable space as identified by Hill PDA, it is considered that the land is being underutilized and does not play a significant role in employment generation within the area. Further, it is noted that the adjoining Dexus building has a high vacancy rate; and*
- *As shown in table 8 above mixed use development on site can potentially generate a net increase of up to approximately 294 employees. As such, the proposal will result in a significantly higher employment generation rate for the site.*

### *Retail assessment*

- *Hill PDA concludes that the site can be redeveloped without jeopardising the role or function of Gladesville or any other existing centre. The report identifies existing demand for an additional approximately 5,000m<sup>2</sup> of retail space on the subject site, including approximately 3,000m<sup>2</sup> of supermarket and 2,000m<sup>2</sup> of specialties (around 15-20) out of which three or four would be non-retail commercial services.*
- *During the preliminary discussions, both Coles and Woolworths have expressed interest in a supermarket of around 3,200m<sup>2</sup> in the area.*

The proposal also undertook various site-specific investigations at the potential development outcomes resulting from the proposal. This includes traffic, geotechnical, contamination and stormwater studies. These studies conclude that the proposed B4 mixed use zoning will not lead to significant adverse environmental or amenity impacts on the adjoining properties or immediate locality.

## 7.6. Mapping

The proposal includes a series of maps to accompany the Draft LEP as follows:

- Land Zoning;
- Height of Buildings; and
- Floor Space Ratio.

The proposal has also includes a draft site specific DCP with the following maps:

- DCP Application;
- Setback Area;
- Access;
- Building Height (number of storeys); and
- Open Space.

## 7.7. Community consultation

A key part of the planning proposal and gateway process is community consultation and engagement.

Should the proposal proceed through the Gateway determination to public exhibition, the community will be provided with an opportunity to be advised of the application and be able to provide comment.

The proposal does not include any additional community engagement strategies beyond the minimum statutory requirements at this stage in the planning process including notification on Council's website and newspapers and to adjoining neighbours.

## 7.8. Supporting documentation

The proposal is accompanied by the following specialist reports:

- Planning proposal prepared by Mecone dated October 2013
- Architectural Design Report prepared by Grimshaw Architects
- Drafting Instructions and LEP Maps prepared by Mecone dated October 2013
- Draft DCP prepared by Mecone dated October 2013
- Net Community Benefit Test prepared by Hill PDA dated August 2013
- Economic Impact Assessment prepared by Hill PDA dated August 2013
- Environmental Site Assessment prepared by EIS dated October 2012
- Geotechnical Assessment prepared by JK Geotechnics dated October 2012
- Traffic Impact Assessment prepared by Traffix October 2013
- Stormwater Management Plan prepared by TTW dated April 2013

## 8. Review of the planning proposal and key issues

This section undertakes an analysis and review of the proposal, including adequacy of the application, planning justification and key planning issues. The following issues are considered to be of strategic planning importance when reviewing the proposal and planning justification:

- Consistency with the Government's strategic planning framework
- Consistency with Council's Strategic Direction (local planning strategy and DLEP 2011)
- Loss of industrial lands
- Role of the Gladesville Town Centre and Victoria Road Corridor
- Retail uses on the site
- Appropriateness of high density residential development
- Other planning approvals in the locality
- Traffic issues

An analysis is also undertaken in the context of the State strategic planning framework, in particular the Strategic Lands Assessment Checklist set out in the Draft Metropolitan Strategy.

Given the recommendations in this report particular, in relation to strategic planning and traffic impacts, a detailed consideration of the proposed controls in the Draft DCP provided by the applicant was not undertaken.

### 8.1. Adequacy review

Section 55 of the *Environmental Planning and Assessment Act 1979* (the Act) set out the requirements for planning proposals. The relevant DP&I guidelines to determine the adequacy of a planning proposal are:

- *Guide to preparing local environmental plans (April 2013)*
- *Guide to preparing planning proposals (October 2012)*

The *Guide to preparing planning proposals* outlines matters that should be included in a planning proposal to satisfy the requirements of the Act. The proposal has been reviewed against the provisions of the Act and DP&I guidelines. This section is not a merit analysis but a review of the adequacy of the application in response to the information required to address the Guidelines.

Overall the application is considered adequate to enable Council to determine whether the proposal should be submitted for a Gateway determination. An overview is provided at Attachment 1 to this Report.

### 8.2. Consistency with the Government's strategic planning framework

The planning justification is one of the most critical parts of the planning proposal. It should provide sufficient evidence that the proposed change of landuse or rezoning is justified in terms of the broader planning framework and the Council's future strategic direction for the

locality. The current proposal is considered to be adequate for the purposes of a gateway determination. Notwithstanding the high quality of the architectural studies, the proposal is considered to be flawed in the following 3 key areas:

- inconsistency with key state planning policies/directions in relation to industrial lands and centres policy;
- inconsistency with Council's strategic direction for the future of industrial land in the Ryde LGA and the general locality; and
- the resultant development outcome is considered inappropriate for the site.

There are 2 fundamental issues to consider in relation to this proposal:

- Should the current industrial land be retained for industrial and employment purposes?
- If not, is a mixed use zoning to allow a major residential and retail development up to 8 storeys with floor space ratios of up to 2.5:1 appropriate in this location?

The Government's strategic planning framework broadly addresses both of these issues. First, both former and current State Government policies acknowledge the need to protect industrial and employment lands. Although, the current Draft Strategy does accept that these lands, particularly within well-established urban areas can be under pressure to be rezoned for other (namely residential and mixed use) uses. In this regard, it provides a checklist for planning authorities to consider when dealing with a rezoning of industrial land.

Second, major residential and mixed use development is generally encouraged to be located within existing centres and strategic corridors to utilise existing infrastructure to take the burden off Sydney's urban fringe and reduce impacts on established areas.

There are also a number of Ministerial Directions (s117 Directions) that provide guidance on the protection of business and industrial lands and other matters on the rezoning process.

Although, the proposal has merit in relation to the proposed seniors living development and community uses, on balance, it is considered inappropriate for this site. In this regard, it is appropriate to consider the proposal against the following policies as detailed below:

- Draft Metropolitan Strategy 2013 and Metropolitan Plan 2036
- State environmental planning policies (as relevant)
- S117 Directions (as relevant)
- Draft Subregional Strategy

#### *Draft Metropolitan Strategy 2013 and Metropolitan Plan 2036*

The Draft Metropolitan Strategy is a high level strategic document to guide the future development of Sydney. In this regard, it provides broad policy direction on many complex and inter-related landuse issues. These directions should not necessarily be related to a specific site, but rather on a precinct, centre or regional basis.

The proposal is located outside of the Gladesville Town Centre, which is identified as a Village in the Ryde LGA centre hierarchy. The Centre has been subject to an extensive master planning exercise, which resulted in a new LEP in 2010. A number of applications have since been submitted and approved within the Centre to support this function. Any future residential mixed use development of this scale should ideally be located within this centre. The Draft Metropolitan Strategy also encourages new major residential development within Centres, to make use of existing infrastructure and encourage diverse and active centres.

This policy direction both supports centre development and protects the existing character of established low density residential areas by limiting the adverse impacts including height, bulk and scale and traffic issues.

The Draft Strategy also seeks to protect existing industrial lands, noting that by exception, consideration to rezone these lands may be undertaken subject to a strategic assessment. The Draft Strategy does promote future housing and employment to be integrated within transport corridors. In this regard, Victoria Road is classified as strategic transport corridor. As a result, it is considered that the site be retained primarily for employment uses for the following key reasons:

- To protect the limited industrial land remaining in the LGA
- Development should be located in centres to support the recent planning undertaken to revitalise the Gladesville Town Centre and Victoria Road Corridor
- The resultant impacts of the proposal on the interface with the residential areas will be unacceptable in relation to traffic

It is also noted that the locality has been previously identified for Enterprise Zone to promote alternative employment uses. It is considered that this should provide a basis for further investigation for alternative employment uses for the site should the existing industrial zone not deliver sufficient employment uses.

#### *Strategic assessment of Industrial lands*

In relation to the loss of existing industrial lands, the Draft Metropolitan Strategy notes:

*... Existing industrial lands, especially in established areas, are under pressure to be rezoned to other uses, despite the clear need for them in the future. Latest data also reveals a noticeable increase in rezoning of employment lands to non-industrial and wider employment uses...*

In response, the Draft Strategy provides a Checklist, which outlines 6 critical questions that should be considered by planning authorities when considering whether to allow industrial lands to be rezoned for other uses (Figure 18).

<b>Criteria Table 1: Industrial Lands Strategic Assessment Checklist for rezoning of existing industrial land to other uses</b>
<ul style="list-style-type: none"> <li>• Is the proposed rezoning consistent with State and/or council strategies on the future role of industrial lands?</li> </ul>
<ul style="list-style-type: none"> <li>• Is the site:               <ul style="list-style-type: none"> <li>- near or within direct access to key economic infrastructure?</li> <li>- contributing to a significant industry cluster?</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• How would the proposed rezoning impact the industrial land stocks in the subregion or region and the ability to meet future demand for industrial land activity?</li> </ul>
<ul style="list-style-type: none"> <li>• How would the proposed rezoning impact on the achievement of the subregion/region and LGA employment capacity targets and employment objectives?</li> </ul>
<ul style="list-style-type: none"> <li>• Is there a compelling argument that the industrial land cannot be used for an industrial purpose now or in the foreseeable future and what opportunities may exist to redevelop the land to support new forms of industrial land uses such as high-tech or creative industries?</li> </ul>
<ul style="list-style-type: none"> <li>• Is the site critical to meeting the need for land for an alternative purpose identified in other NSW Government or endorsed council planning strategies?</li> </ul>

Figure 18: Industrial Lands Strategic Assessment Checklist  
(Source: Draft Metropolitan Strategy)



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The proposal provides a summary analysis against the checklist both in the planning report prepared by Mecone and the Net Community Benefit Test prepared by Hill PDA. The proposal is not considered to satisfactorily address the checklist as detailed below:

- *Consistency with a Strategy*

The proposal is clearly inconsistent with Council's local strategy of retaining the remaining areas of industrial land within the Ryde LGA. This is reflected in the Local Planning Strategy, which resulted in retaining the sites' IN2 light Industrial zoning in the Draft LEP 2011. The proposal is also considered to be inconsistent with both the Draft Metropolitan Strategy and Draft Subregional Strategy as detailed in Sections 5.3, 8.2.1 and 8.2.4 of this report.

The proposal argues that by providing additional employment to current uses, combined with broad changes to the current employment profile is sufficient to satisfy this provision. This is considered simplistic and does not address the underlying role of the site as part of an urban services cluster of industrial uses to support other businesses in the Ryde LGA.

Further, recent demographic data indicates that generally industrial uses are catering for the current employment profile of the LGA.

- *Proximity to infrastructure*

The site is well located to Victoria Road for industrial uses, which has been identified as a both a strategic transport corridor and tertiary freight corridor in the Government's Long Term Transport Masterplan and Freight and Ports Strategy. The site is considered to be generally well located to the Precinct, with Victoria Road acting as a key transport corridor to service both sides of the Precinct.

- *Impact on existing stocks and demand*

The Gladesville Industrial Precinct is approx. 21.27 ha (excluding the bus depot). This represents over 75% of the remaining IN2 Industrial Land in the LGA with only 2.12% of all employment land within the LGA. Given the very limited remaining industrial land within the LGA, the rezoning of the site is considered to have an impact on existing industrial land stocks.

The proposal argues that the site is not well connected to the remaining part of the Gladesville Industrial Area and combined with changing nature of the Ryde employment profile to 'white collar' jobs therefore should be rezoned. It is acknowledged that the site may not be currently contributing to the industry cluster of the Precinct, however in isolation this is not considered sufficient to support the application.

- *Impact on ability to meet targets*

Ryde LGA is currently on track to meet its employment targets without the redevelopment of this site. The applicant argues that a mixed-use development will provide a higher number of jobs – which may be the case.

However, it is the type of jobs and role and function of the site, which is critical. The redevelopment of the Top Ryde Shopping Centre and recent initiatives to rezone the Gladesville Town Centre are likely to provide sufficient retail jobs for the LGA as outlined in the Ryde Local Planning Strategy.

- *Compelling argument that the site cannot provide other industrial uses*

It is considered that the proposal has not provided a compelling argument on this issue. There has been little analysis of the existing role and function of the Gladesville Industrial Area or consideration of viable alternative industrial/employment generating uses for the site.

- *Critical to meet the need of Strategy*

The site has been identified for retention in an endorsed local strategy. In this regard, Council's Local Planning Strategy recommends retention of the site for industrial uses, noting the existing industrial areas are vital to meet local and regional needs in affordable locations, such as Victoria Road on the edge of identified centres. Similarly, the Draft Subregional Strategy also recommends that the industrial land be preserved (Section 5.3, 8.2.4 and 8.3 and 8.4.4)

### 8.2.1. State environmental planning policies

The SEPPs relevant to the proposal are generally applied at the development application stage, with the exception of *State environmental planning policy 55 - Remediation of Land*.

In relation to this SEPP, when considering a planning proposal, Council must:

- consider whether the land is contaminated, and
- if the land is contaminated, be satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for proposed uses, and
- be satisfied that the land will be remediated before the land is used for that purpose.

The application is accompanied by a Preliminary Stage 1 Report to address potential contamination issues from the previous industrial uses. This report has been referred to the relevant Council officers, who conclude that although there is insufficient information and the reports only covering one of the 2 sites, they raise no objection to further investigation of the site. Given the recommendation of this report, it is not considered appropriate to request further information at this time.

Should Council support to progress the planning proposal; it is recommended that Council seek further information from the applicant in order to satisfy the requirements of SEPP 55.

A high level assessment of the proposal has taken into consideration *SEPP 65 – Design Quality of Residential Flat Development* as detailed in Section 10.3 of this report.

### 8.2.2. Section 117 Directions

The proposal is considered to be inconsistent with a number of s117 Directions including loss of industrial lands, site specific provisions and consistency within the Metropolitan Strategy as detailed below at Table 2.

Ministerial Directions	Comment
1.1 Business and Industrial zones	<ul style="list-style-type: none"> <li>• The applicant maintains that the proposal is consistent with the Direction, as it will continue to provide for business operations.</li> <li>• The proposal does provide for a continuation and potentially an increase of employment uses. However, it is considered inconsistent with the</li> </ul>

Ministerial Directions	Comment
	<p>objectives and provisions of the Direction as it:</p> <ul style="list-style-type: none"> <li>• does not protect industrial land;</li> <li>• is located outside of an identified centre; and</li> <li>• is not considered to be consistent with an identified strategy.</li> </ul>
3.1 Residential zones	<ul style="list-style-type: none"> <li>• This Direction encourages housing choice within existing urban areas to minimise impacts on the urban fringe.</li> <li>• The proposal is considered to be consistent with this Direction.</li> </ul>
3.4 Integrating land use and transport	<ul style="list-style-type: none"> <li>• The proposal is located in close proximity to a major transport corridor (Victoria Road) and existing public transport and therefore partially satisfies the Direction.</li> <li>• However, given the potential traffic issues identified in the Independent Council's traffic report, it will have adverse impacts on the local road network, including the intersection at Tennyson Road and Victoria Road (which has been identified as a strategic bus corridor and arterial road and tertiary freight corridor).</li> </ul>
4.1 Acid Sulfate Soils	<ul style="list-style-type: none"> <li>• The site is has not been identified as affected by Council's Acid Sulfate Soils Map.</li> <li>• Notwithstanding, the proposal has committed to manage any impacts in accordance with the relevant guidelines.</li> <li>• The proposal is considered to be capable of being consistent with this Direction.</li> </ul>
6.1 Approval and Referral Requirements	<ul style="list-style-type: none"> <li>• The proposal does not include any referral provisions. It is noted that the ISEPP 2007 requires consultation with the RMS in relation to traffic generating developments, which is likely to be required should the proposal proceed to a rezoning.</li> <li>• The proposal is considered to be consistent with this Direction.</li> </ul>
6.3 Site Specific Provisions	<ul style="list-style-type: none"> <li>• The proposal seeks a B4 Mixed use zone with additional uses and objectives that are not permitted including high-density residential uses. It also proposes specific height controls based on the concept masterplan.</li> <li>• The proposal is considered inconsistent with this Direction due to the proposed height controls that are specifically related to the proposed development outcome.</li> </ul>
7.1 Implementation of Metropolitan Plan for Sydney 2036	<ul style="list-style-type: none"> <li>• The proposal seeks to rezone Employment Lands, which is inconsistent with the current Metropolitan Plan.</li> <li>• The Draft Metropolitan Strategy also seeks to retain industrial land, however recognises the pressure to rezone these lands to other uses, including residential uses. The Strategy provides a framework to assess these proposals – Industrial Lands Strategic Assessment Checklist.</li> <li>• The applicant's assessment under this framework is not supported and therefore the proposal is considered to be inconsistent with this Direction.</li> </ul>

Table 2: Consideration of S117 Directions

### 8.2.3. Draft Subregional Strategy

Council has demonstrated that it can exceed both the housing and employment targets set by the Draft Strategy in existing and identified centres, without the need to rezone additional land within the Ryde LGA. Generally, the proposal is considered to be inconsistent with the Strategy in terms of retention of industrial land and location of mixed-use development in this location. This issue is detailed in the analysis in Section 8.3 of this report below.

As identified in both the Draft Metropolitan Strategy and Draft Subregional Strategy, existing industrial land in established areas is limited. Should areas such as Gladesville Industrial Area be rezoned, this is likely to impact on the supply of these industrial and employment uses, in particular urban services to service local and regional communities.

### 8.3. Consistency with Ryde Local Planning Strategy and Draft LEP 2011

The Ryde Local Planning Study informs the Draft LEP 2011. The proposal is considered to be inconsistent with the Draft LEP, which retains the site's Light Industrial zone for future employment and industrial uses. An analysis of the key directions of the Strategy relevant to the proposal is detailed below:

#### *Centres and Corridors*

- The study builds on Council's Urban Village Strategy 1998, which identifies Gladesville Town Centre as a Village and supports the new LEP to strengthen its role for employment and housing. The study identifies the site as part of the Gladesville Industrial Area located within the Victoria Road Corridor.
- The study recognises the current issues faced by industrial lands and makes recommendations to include other employment uses to facilitate growth and encourage retention of employment uses of these areas. The study concludes that Ryde can deliver its housing and employment targets in its existing centres without relying on this site.
- The Study recognises the Victoria Road Economic Corridor as providing low cost accommodation for a range of local and regional services, including start-up offices, light industrial, showrooms, building supplies and retail. As a key corridor detailed in the Centres and Corridors Study, the Victoria Road Corridor runs through West Ryde, Gladesville and two industrial precincts identified as strategic employment lands in the Inner North Subregional Strategy.

The proposal is considered to be inconsistent with this objective of retaining the industrial and employment opportunities within this corridor location.

#### *Housing*

- The study demonstrates that Council can deliver its housing targets set by the State Government, which have been increased in the Draft Metropolitan Strategy. The study recommends concentrating housing within Macquarie Park and its Town Centres, in particular large apartment buildings and mixed use developments within identified centres. The study identifies up to 1,100 new dwellings within the Gladesville Town Centre.
- Council has recently undertaken further analysis of dwelling numbers for the LGA, which indicate a significant increase in previous future dwelling estimates. The Draft Inner North Subregional Strategy set a target of 12,000 additional dwellings in the LGA by 2031.
- The Ryde Local Strategy estimated a total of 15,751 additional dwellings between 2004-2031. A review of dwelling numbers has seen this estimate increase to 34,467 during this period (Table 4), with 27,753 additional dwellings between 2014 and 2031. Council advise that this increase is due to the following:
  - Numerous major project approvals (Part 3A) in Macquarie Park and Meadowbank issued by the State Government
  - North Ryde Station Precinct
  - Revised dual occupancy numbers based proposed subdivision provisions
  - Upzoning of Eastwood and Ryde

- Herring Road Urban Activation Precinct

Time period	Estimated additional dwelling numbers (excluding Herring Road UAP areas within Macquarie University)
Subregional Strategy (2004 – 2031)	12,000
Ryde Local Planning Study (2004 – 2031)	15,751
Revised Estimate (2014 – 2031)	27,753
Revised Estimate (2004 – 2031)	<b>34,467</b>

Table 4: Revised dwelling numbers for Ryde LGA (Source: Ryde City Council)

- The study also identifies residential transition areas located on the edge of centres consisting of small apartment buildings, town houses, villas and houses. Notwithstanding the importance of retaining the site's industrial uses, the proposal is not considered to have demonstrated an appropriate built form response as a transition area in this location.

#### Employment

- The Inner North Draft Sub Regional Strategy requires the LGA to cater for an additional 21,000 workers by 2031. The Strategy outlines that the LGA will exceed this figure by providing over 28,600 jobs will be provided in the City as a result of development within the Centres and industrial areas. The Strategy makes the following comment:

*... In 2007 Macro Plan, a planning consultancy undertook an assessment of jobs growth in the City, as part of the employment lands assessment undertaken for the Meadowbank Master plan. This assessment indicated that the growth of the commercial /office sector between 2004 - 2031 would result in the creation of 39,000 jobs. The main growth area would be the Macquarie Park Corridor. Considering of both set of figures it is apparent that the City will meet the target of 21,000 additional jobs by 2031 ... (City of Ryde Local Planning Study Employment; Page 7-29)*

- The study also recognises the changing nature of industrial land and undertakes a high level analysis of supply and demand of the remaining industrial land in the LGA.
- The study concludes that with changes to Meadowbank and Macquarie Park, the retention of existing industrial land within the Gladesville Industrial Area is vital to service for local and regional needs.
- It also finds that the LGA exceeds its retail supply for the region, which will only grow with the development of Top Ryde and Macquarie Centre. It also identifies Victoria Road Corridor in this location for future employment potential as an enterprise corridor.

#### Strategic Direction

- The study protects existing employment Lands by maintaining the IN2 Light Industrial Zone (including the site) but introducing height controls and additional issues, including bulky goods and commercial uses for other specific sites along Victoria Road.

- The Study recommends that Council undertake further investigations of industrial areas within the LGA to develop strategies to maintain these areas as viable employment lands.

#### Summary

The proposal is considered to be generally inconsistent with the intention and directions of the Local Planning Strategy. This is primarily in terms of the retention of industrial land and location of major housing and retail development outside of an identified centre. The Strategy indicates that the LGA can meet its housing and employment targets without relying on future dwellings or employment from this proposal.

The Strategy recognises the difficulties faced by industrial lands and recommends Council undertaken further investigation to expanding employment uses to address this issue.

The Strategy also identifies the Gladesville Town Centre and Victoria Road corridor as the primary place of new retail and major residential development in this location, supporting the development of the Centre, which is reflected in the recent LEP 2010 and subsequent development activity.

## 8.4. Loss of industrial lands

This report does not contain a detailed economic or demographic analysis. It provides planning consideration of key issues in consultation with Council staff and Council's independent demographic and employment experts. It undertakes an analysis of key issues in the context of the relevant planning strategies and policy and makes observations and recommendations based on key demographic and employment data provided by economy id (economic profile / data tool).

The City of Ryde has rezoned a number of industrial lands for residential and commercial uses, namely Meadowbank and Macquarie Park. Both of these areas have been subject to targeted and comprehensive planning studies, which saw the transformation of these areas from industrial uses to mixed uses and specialised centres.

As noted in the Ryde Local Strategy, the transformation for Meadowbank was pursued for a number of reasons:

*The Meadowbank Employment Area began its transformation from an industrial area comprising manufacturing/auto activities to a residential/commercial area in the late 1990s. The transition occurred as a result of a new set of planning controls that reflected the emergence of the Parramatta River as a residential and commercial corridor - a development trend that was occurring in Rhodes, Cabarita and elsewhere along the river. The transition of the areas was a reaction to the relocation, down scaling and closure of heavy industrial activities within the inner ring suburbs (City of Ryde Local Planning Study, Employment; page 7-15).*

The Draft Metropolitan Strategy specifically identifies Macquarie Park as a Specialised Centre and part of the Global Economic Corridor, which has been recently supported by significant investment and planning including major commercial and residential developments and integrated transport such as heavy rail lines.

Although there are some parallels with these sites and the current Industrial areas, they are not considered to be comparable to the current site and have been part of broader master planning responding to both market issues with broad Government and Council support.

### 8.4.1. Existing Industrial Lands in Ryde LGA

The loss of industrial lands is the central strategic planning issue in the consideration of the proposal.

The Gladesville Industrial Area is one of the last two remaining industrial areas in the Ryde LGA (the other is the West Ryde Industrial Area), following the rezoning of the Meadowbank Employment Area and ongoing transformation of Macquarie Park as a Specialised Centre (Figures 19 & 20). This issue is recognised in both the Draft Subregional Strategy and Ryde Planning Strategy.

Combined, both precincts represent a very limited area nominated for these type of employment uses in the LGA, in fact representing less than 2.8% of the total employment land in the LGA and 0.69% of the total area of the LGA. Details of these areas are outlined in Table 3 below.



Figure 19: West Ryde Industrial Area (Source: Ryde LEP 2010)



Figure 20: Gladesville Industrial Area (Source: Ryde LEP 2010)

IN2 Industrial Precinct	Predominate use	Size (ha)	% employment land in Ryde LGA	% total land in Ryde LGA
<b>Gladesville</b>	Local industry – automotive, construction and support services	21.27ha	2.12%	0.52%
<b>West Ryde</b>	Local industry – automotive, construction and support services	6.66ha	0.66%	0.16%
<b>Total</b>		<b>27.93ha</b>	<b>2.78% (1002.89ha)</b>	<b>0.69% (40.651 km2)</b>

Table 3: Light Industrial Areas in Ryde LGA

### 8.4.2. Role of Gladesville Industrial Area

The Gladesville Industrial Area plays an important role of providing local and regional services to the community. A recent audit undertaken by Council officers reveals a number of automotive, construction and businesses that provide a local and regional service role to both the public and other businesses in Ryde LGA. It is considered that these businesses provide a critical role as urban support services for other major employment areas in the LGA including Macquarie Park and other major centres such as Top Ryde.

This Industrial Area can be categorised as containing a cluster of long-standing automotive uses, which is evolving to construction and other urban services.

As part of Draft LEP 2011, Council proposes a number of additional uses in the zone including funeral homes, hardware and building supplies, landscaping material supplies and storage premises. In addition, commercial uses and bulky goods retailing have also been permitted on specific sites fronting the Victoria Road corridor. Council advises that these uses were permitted due to the location of the site with direct access to Victoria Road, size and configuration and characteristics of the site.

### 8.4.3. Applicant's argument

The proposal includes a net community benefit test and analysis of the loss of industrial lands based on the DP&I's Draft Centres Policy 2009. This draft policy was placed on exhibition in April 2009 as a consultation draft – not Government policy under the former State Government and has not been endorsed.

The DP&I has advised that this policy (and the Draft Competition SEPP) is not being actively progressed at present and that the issues that they seek to address are more likely to be examined in the development of the new State Planning Policies as part of the new planning system. The Draft Metropolitan Strategy and the Ryde Local Planning Strategy are considered the appropriate strategic documents in this instance.

Notwithstanding, the applicant's argument to address the loss of industrial lands can be summarised as follows:

- The demand for industrial land has decreased in the LGA, through broader market conditions and the growth of Macquarie Park as a specialised centre, also identified in the Ryde Local Planning Strategy
- The employment profile of the LGA has reduced blue collar workers
- Industrial land in the LGA has difficulties competing with western Sydney
- Council have recently identified additional land uses within the Gladesville Industrial Area demonstrating evidence of struggling traditional industrial uses
- The site is currently underutilised with low employment yields
- The proposal will provide for higher employment yields on the site
- The site is disconnected from the main part of the Gladesville Industrial Area and does not have critical mass for the successful operation of industrial uses.



### 8.4.4. Response and assessment

#### Importance of industrial land to the LGA

The site forms part of one of the last remaining light industrial areas within the Ryde LGA. Notwithstanding the pressure to rezone this and other industrial sites, the preservation of this land for future light industrial and employment uses has been encouraged and recommended by the relevant planning strategies and policies, namely the Ryde Local Planning Strategy which provides the strategic direction of the LGA.

Similarly, the Draft Inner North Subregional Strategy clearly identifies this site for retention on a regional basis due to the limited supply of industrial lands in the region.

On a broader scale, the Employment Lands Development Program (ELDP) 2011 report notes that the demand for industrial land will increase and notes a limited supply of undeveloped and serviced land across Sydney. The ELDP 2010 Inner North Subregion report also specifically identifies the Gladesville Industrial Area as having the second highest job densities in the region.

Industrial uses are important to the LGA and surrounding region. Industrial uses are a dominant job, revenue and wealth generator for both the LGA and many surrounding areas<sup>1</sup>. Manufacturing and wholesale trade have been used as examples to illustrate this issue.

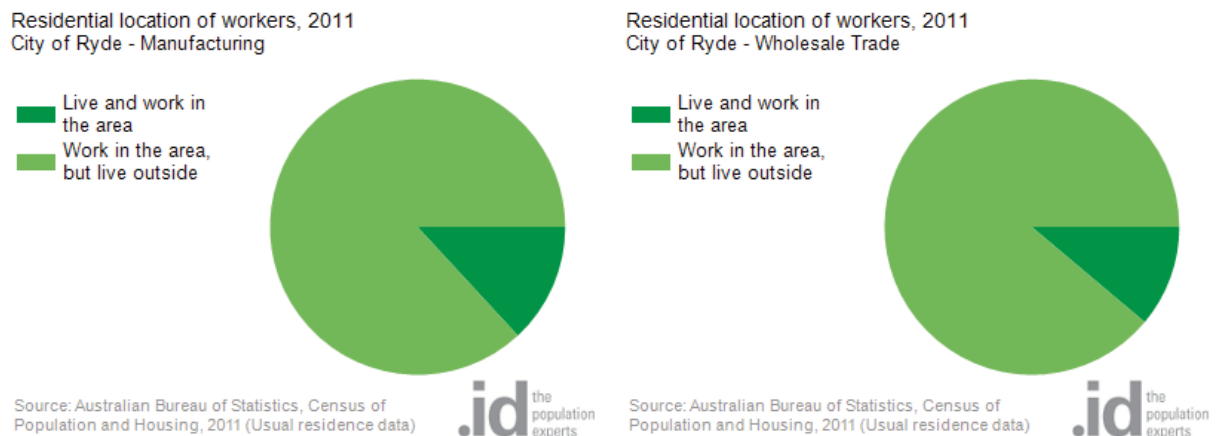


Figure 21: Location of workers in manufacturing and wholesale trade indicating importance to the region (Source: economy id 2013)

The following extract from economy id illustrates that manufacturing and wholesale trade represent the largest single employer in the LGA:

#### *Dominant groups*

*An analysis of the jobs held by the full-time equivalent workforce in City of Ryde in 2011/12 shows the four largest industries were:*

- Professional, Scientific and Technical Services (12,900 FTEs or 15.4%)
- Information Media and Telecommunications (11,333 FTEs or 13.6%)

<sup>1</sup> Sources: economy.id, labour force region map, employment capacity, ABS journey to work, FTE Employment

- Wholesale Trade (10,847 FTEs or 13.0%)
- Manufacturing (7,723 FTEs or 9.2%)
- Retail Trade (5,540 FTEs or 6.5%)

*In 2011/12, retail consisted of 4,670 jobs making up 5.6% of the workforce, whilst wholesaling and manufacturing accounted for 18,570 jobs and 22.2% of the workforce.*

It is acknowledged that (in particular manufacturing), Macquarie Park and other locations contribute to these statistics. However, these are landuses that are permissible on the site and can be used for future employers.

It should be noted that wholesale trade (as defined by the ABS) includes: basic material wholesaling, machinery and motor vehicle wholesaling and personal and household good wholesaling. Although these landuses are currently prohibited in the IN2 Light Industrial Zone, in order to provide additional employment opportunities, Council is recommending that wholesale supplies be added as a permitted use in this zone. This additional landuse is part of a planning proposal to the Ryde LEP, which is currently with the DP&I for a gateway determination. In this regard, it is considered relevant to consider this landuse to demonstrate the importance these types of industrial uses to the LGA, particularly compared with retail uses.

#### *Significant growth in industrial activities*

A number of industrial uses are growing, in particular wholesaling and manufacturing. High Tech industries such as computer and telecoms rely upon wholesaling and small manufacturing support industries<sup>2</sup>

The following extract from economics id illustrate that manufacturing and wholesale trade are growing, while the retail sector indicates little growth in full time equivalent (FTE) workers:

#### *Emerging groups*

*The number of people in the full-time equivalent workforce in the City of Ryde increased by 17,518 between 2005/06 and 2011/12. The largest changes in the jobs held by the full-time equivalent workforce between 2005/06 and 2011/12 in the City of Ryde were for those employed in:*

- Information Media and Telecommunications (+7,792 FTEs)
- Professional, Scientific and Technical Services (+3,100 FTEs)
- Manufacturing (+1,900 FTEs)
- Wholesale Trade (+1,603 FTEs)
- Retail (+142 FTEs)

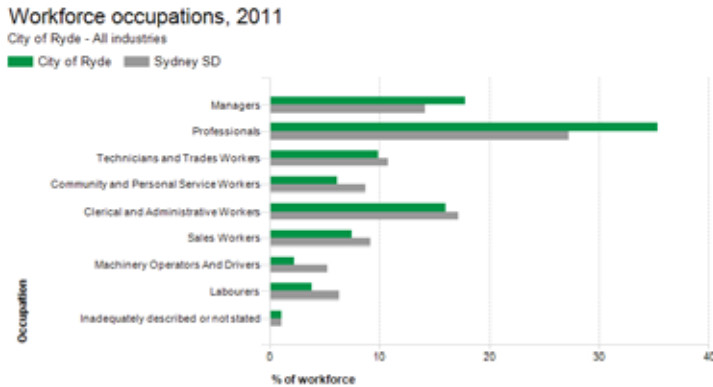
#### *Industrial land is well suited to the new residential workforce in Ryde*

Ryde's workforce is evolving, with a higher number of educated workers compared to Greater Sydney (Figure 22). This can be seen to match some industrial uses with the workforce profile indicating Manufacturing and Wholesale Trade in Ryde with higher rates of highly educated, productive, young, and professional workers than Greater Sydney<sup>3</sup>.

<sup>2</sup> Sources: economy.id, NIEIR – employment, output, value-add, productivity, industry Sector Analysis

<sup>3</sup> Sources: profile.id, ABS qualifications by industry, ABS occupations by industry, ABS income quartiles

In summary, it is considered that industrial lands and uses play an important part in the economic well being of the Ryde LGA. They contribute to the economy for both local residents and broader region and can respond to the changing employment profile for Ryde. In relation to the Gladesville Industrial Area, it is considered to provide a valuable cluster of automotive and construction based uses that service both the local and broader community.



Source: Australian Bureau of Statistics, Census of Population and Housing, 2011. Compiled and presented in economy id by id, the population experts.

Figure 22: Workforce occupations in Ryde LGA (Source: economy id 2013)

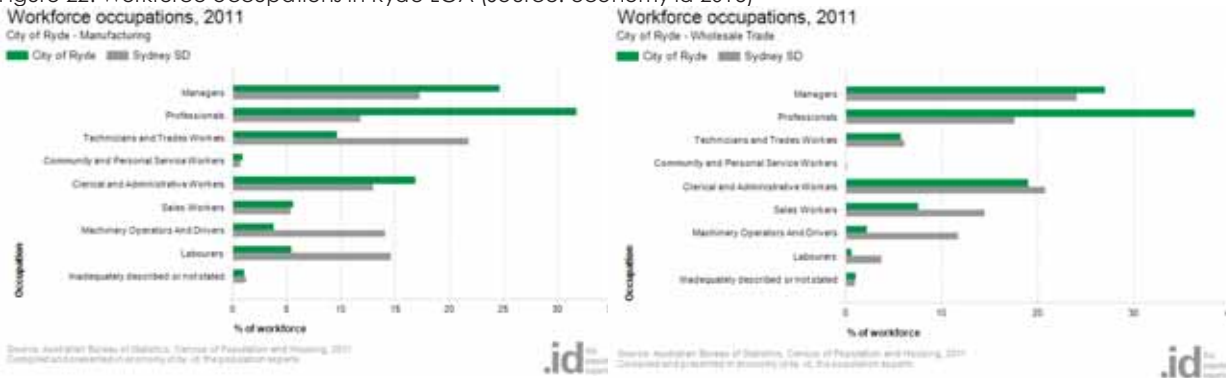


Figure 23: Workforce occupations of manufacturing and wholesale trade demonstrating catering to new workforce in the Ryde LGA (Source: economy id 2013)

*Current uses and future employment yields*

It is acknowledged that the current operations may not provide the optimal employment numbers for the site, compared with a mixed use retail scheme. However as detailed above, given the importance of industrial lands to the LGA, the site should be retained for industrial/employment purposes.

However, it has been acknowledged by Council in its Local Planning Strategy that there is a need to assist landowners to consider additional employment uses on industrial lands. In this regard, Council has expanded the uses in this zone to respond to this issue and recognition that securing viable tenants can be challenging.

Council has advised that under draft LEP 2013 a number of additional land uses are proposed to be permitted with consent including funeral homes, hardware and building supplies, landscaping material supplies and storage premises. In addition, wholesale supplies and recreation facility (indoor) will also be permitted with consent in the IN2 zone through a separate draft LEP (currently awaiting Gateway Determination).

Given the demographic and economic work recently undertaken by Council, it is considered reasonable for Council to work with the landowners to investigate additional uses for the site for future employment and industrial uses. These future uses should support other major industries in the LGA and provide employment for both the local workforce and also continue to act as an attractor for workers outside of the LGA.

#### *Site disconnected to the Industrial Area by Victoria Road*

The locality and indeed many parts of the Ryde LGA are characterised by precincts that are bisected by major transport corridors, including roads and rail. This is not considered a valid reason to rezone the land to enable a mixed use development. To the contrary, the site's location in proximity to a major transport corridor and identified tertiary freight route is considered appropriate to support future employment uses.

#### *Summary*

The applicant's arguments are not accepted in relation to the loss of industrial land on this site. Recent data indicates that industrial uses are responding to the employment profile of the LGA and are a valuable contributor to the economy. These uses provide urban services to support other businesses in Ryde and also jobs for a number of workers outside of the LGA. This report identifies scope for further investigation of these uses on a site by site basis, similar to recent amendments to land along Victoria Road in this locality to respond to existing site conditions and characteristics, access/traffic issues and impacts on the surrounding locality.

## 8.5. Role of Gladesville Town Centre and Victoria Road Corridor

The relevant state and local strategic planning policies encourage the development of centres to support future high-density housing, mixed use and employment uses. Council has supported the growth of the centres within the LGA for many years.

The Ryde Urban Village Strategy 1998 commenced this work, which has been carried through in the Ryde Local Planning Strategy, new LEP for Gladesville Town Centre and other work in centres across the LGA.

The Strategy identifies Gladesville as a Village within the Ryde Centres network and the desired future character as:

*Gladesville will service a local community, with increased community services and facilities (e.g. urban parks and plazas) and a safe, convenient pedestrian network that connects local destinations (City of Ryde Local Planning Study, Centres and Corridors; 2-35).*

The new LEP is based on a Masterplan for the Town Centre that adopts a precinct based approach, each with different roles and functions – Monash Road, North Gladesville, Gladesville Village and South Gladesville. The site adjoins the Monash Road Precinct, with a desired future character as identified in the Strategy below:

*Land use: Without competing with Gladesville Town Centre, Monash Road Precinct will provide a mix of convenience retail and services to local residents and workers in addition to specialist goods and services for the wider community.*

*Built Form: Gateway site five stories, retain heritage item  
Public domain: strip shopping character format – outdoor dining street activation  
(City of Ryde Local Planning Study, Centres and Corridors; 2-131)*

The LEP addresses anomalies for certain sites adjoining the corridor and town centre. This involved amending the zoning, height and FSR development standards in the LEP and the DCP. The new LEP provided further opportunities for mixed land use zones and development potential to create a transition between the higher density on Victoria Road and adjoining land uses.

The Study identifies that the Gladesville Town Centre and Victoria Road Corridor serves an important function in the LGA by providing cheaper, flexible accommodation that will support start up and small businesses to contribute to the employment diversity of the LGA. The new LEP is expected to provide for an additional 1,100 jobs. The Strategy makes the following key recommendations in relation to the Gladesville Town Centre:

*Being close to city (20mins) with good public transport, 360 views, leisure and sporting facilities, Gladesville, Primrose Hill and Monash Road will offer exceptional live-work environments. The potential for growth is therefore strong.*

*Gladesville town centre will spread towards Monash Road and the Gladesville Industrial precinct. The master plan and DCP aim to maintain the two as distinctive centres and create different less intensive urban development in between. It will be important to concentrate retail development in the two centres rather than dilute it. (City of Ryde Local Planning Study, Centres and Corridors; 2-132)*

### Summary

Council (in consultation with the community) undertook planning work for Gladesville Town Centre and Victoria Road Corridor that commenced with high-level strategies, followed by a Masterplan and finally delivery through a new LEP for the area. The LEP did not extend to the site and covered land located within the Victoria Road transport corridor in recognition of:

- existing business areas that required revitalisation;
- the availability numerous of sites within the area for redevelopment; and
- the need to protect existing industrial and employment lands.

The aims and objectives of the LEP are now evident in a number of development proposals within this area. The Centre and corridor have been planned as the most appropriate location to contain a major mixed use development.

## 8.6. Retail uses on the site

This report does not contain a detailed retail assessment or economic analysis. It provides planning consideration of key issues in consultation with Council staff and Council's independent demographic and employment experts. It undertakes an analysis of key issues in the context of the relevant planning strategies and policy and makes observations and recommendations based on key demographic and employment data provided by economy id (economic profile / data tool).

The proposal includes a significant amount of retail and other commercial uses on the site including a full line supermarket. The application includes an economic analysis that concludes retail uses is justified on the site due to:

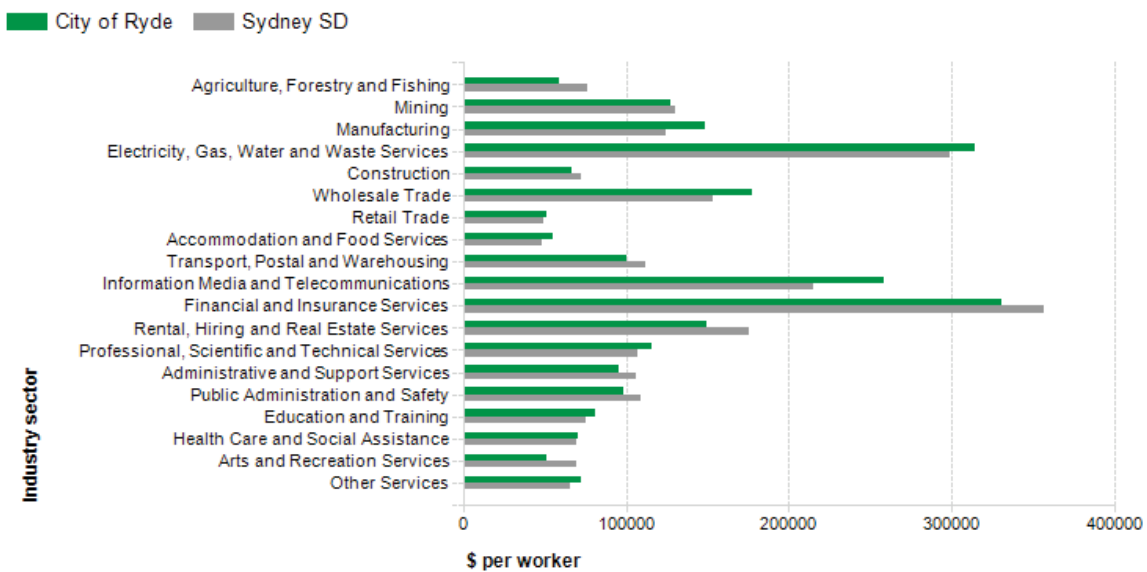
- Demand within an identified main trade area
- Retail impact assessment on other centres
- Residential impact assessment
- Other economic benefits

*Importance of industrial versus retail uses*

The analysis of the demographic and economic data indicates that some industrial activity in Ryde is more valuable to the economy than retail uses (Figures 24 & 25). For example, the data indicates that *manufacturing* and *wholesale trade* significantly outperform *retail* in terms of employment numbers (more than 3 times), output (more than 12 times), value-add (more than 8 times - \$3.06 billion compared to \$363 million), exports (\$5.8 billion compared to \$19.8 million) and worker productivity<sup>4</sup>.

This does not suggest that retail is not important to the community, but seeks to illustrate the relative importance of some industrial uses to the LGA. This should also be considered in the context of major retail centres being completed at Top Ryde and Macquarie Centre, which when combined with other centres are identified by Council's Local Strategy as able to cater for retail demand in the LGA.

**Productivity per worker (annual) by industry 2011/12**



Source: National Institute of Economic and Industry Research (NIEIR) @2013



Figure 24: Productivity per worker by industry in the Ryde LGA (Source: economy id 2013)

<sup>4</sup> Sources: economy id, NIEIR – FTE Employment, Output, Value-add, Exports, and Productivity

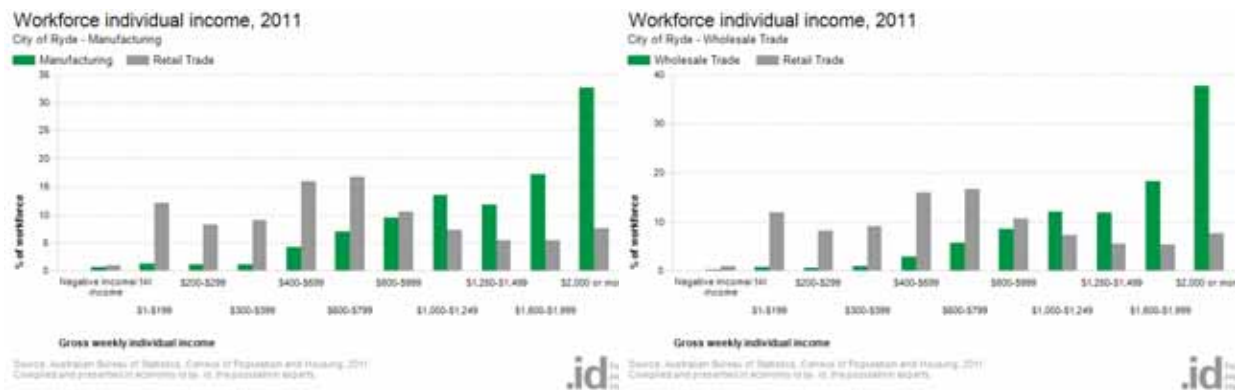


Figure 25: Workforce comparing industrial uses to retail indicating that industrial uses cater to Ryde's workforce (Source: economy id 2013)

### Retail demand and supply

Council's Local Planning Strategy concludes that it can meet its employment targets within identified centres. In relation to retail floorspace, the Strategy undertakes a review and analysis of its major centres and villages.

Relevant extracts from the strategy illustrating this work follows (our emphasis):

*... with regard to retail floor space, Ryde is well served by a mix of Major Regional, Regional and Sub-regional centres. These centres are in addition to the usual supply of local and neighbourhood centres. The total supply of retail floor space in Ryde is appropriate with regard to the needs of residents ...*

*... Ryde's 100,000 residents will create demand for approximately 170,000m<sup>2</sup> of retail Floor space in the City of Ryde. In 2007, there is approximately 176,000m<sup>2</sup> of retail Floor space supplied within Eastwood, Top Ryde, West Ryde, Gladesville and Macquarie Centre.*

*With further expansions expected at Top Ryde and Macquarie Centre, this assessment shows that there is an **adequate supply of retail floor space offer at the major-regional and regional retail hierarchy in the City of Ryde relative to the resident expenditure pool...** (City of Ryde Local Planning Study, Centres and Corridors; 2-29)*

Based on the above, it appears that the site is not required to meet the LGA's retail needs. Notwithstanding, the proposal maintains there is unmet retail demand of 8,200m<sup>2</sup> in the Gladesville Shopping Village. A specialist study is required to refute these claims, however it is unclear whether this assessment has taken into account the current developments in the locality detailed in Section 8.8 of this Report.

### Impact on other centres

An analysis of the impact on existing centres formed part of the proposal's retail assessment. The results of this analysis are detailed in Figure 26 below.

Table 9 - Redirection of Expenditure from Existing Centres (\$m2009)

	1	2	3	4	5	6	7	8	9	10
Retail Centre	Time Travel from Subject Site in minutes*	Approx. Retail Floor Space (sqm)**	Turn-over in 2011 (\$m)	Turnover in 2016 without Proposal (\$m)	Turnover in 2016 with Proposal (\$m)	Immediate Shift in Turnover (\$m)	% Shift in Turnover in 2016	Shift in turnover from 2011 to 2016 (\$m)	% Shift in turnover 2011 to 2016	
Proposed Centre					50	50				
Macquarie Park	11.5	115,150	482.9	576.3	569.8	-6.5	-1.1%	86.9	18.0%	
Top Ryde	5.5	60,000	325.7	370.3	359.5	-10.7	-2.9%	33.9	10.4%	
Lane Cove	11.0	16,950	106.7	115.6	112.3	-3.2	-2.8%	5.6	5.2%	
Gladesville***	4.0	15,050	94.0	106.8	100.2	-6.6	-6.2%	6.3	6.7%	
Boronia Park	5.0	1,000	8.8	9.7	9.1	-0.6	-6.1%	0.4	4.2%	
Putney	3.0	1,000	8.0	9.1	8.3	-0.8	-8.3%	0.3	4.3%	
Pittwater Road	5.0	500	2.8	3.1	3.1	0.0	-0.3%	0.3	9.9%	
Rhodes	8.0	26,000	171.0	208.0	203.5	-4.6	-2.2%	32.5	19.0%	
Eastwood	12.0	47,250	243.5	275.5	271.3	-4.2	-1.5%	27.8	11.4%	
West Ryde	9.0	26,000	178.7	197.3	192.0	-5.3	-2.7%	13.3	7.4%	
Meadowbank	9.5	5,500	44.0	49.1	46.9	-2.1	-4.3%	2.9	6.7%	
Other Localities						-5.0				
<b>TOTAL</b>		<b>314,400</b>	<b>1,666.0</b>	<b>1,920.8</b>	<b>1,925.7</b>	<b>0.0</b>	<b>0.3%</b>	<b>259.7</b>	<b>15.6%</b>	

\* Drive-time (minutes) based on Googlemaps (average to and from)

\*\* Excludes non-retail commercial uses and vacant spaces

\*\*\* Includes permitted development at 297-307 Victoria Road

Figure 26: Re-direction of turnover from existing centres (Source: Hill PDA 2013)

The above table indicates that the proposal would re-direct turnover from a range of existing centres in the locality. The greatest impacts in 2016 are on Gladesville Village (\$6.6m or 6.2% immediate loss of trade), Top Ryde (\$10.7m or 2.9% loss of trade), Boronia Park (\$0.6m or 6.1% loss of trade) and Putney (0.8m or 8.3% loss of trade). In response to this issue, the proposal advises that:

*There are no universal measures of significance of economic impact. There are references in various consultancy reports and statements in the NSW Land & Environment Court, which suggest that a loss of trade below 5% is considered insignificant. In broad terms impacts of below 10% are considered to be within the normal competitive range. The above impacts are all below 10% and are therefore considered to be insignificant to moderate and within normal competitive range (Hill PDA Report).*

Further specialist advice is required to fully address this issue. Although (based on Hill PDA advice) impacts between 5 -10% are accepted industry practice, the impact on Gladesville Town Centre following the recent planning work to re-invigorate the area through the LEP should be seriously considered by Council when considering major retail development outside of the Gladesville Town Centre.

### Summary

The above data illustrates that a range of industrial uses are highly valuable to the economy, in some cases more than retail jobs. In terms of supply and demand, based on Council's previous work, it appears that retail demand can be met within existing centres and the negative impacts on the Gladesville Town Centre and other surrounding smaller centres can be avoided.



## 8.7. Appropriateness of high density residential development on the site

Notwithstanding the loss of industrial land, a key issue for this proposal is the appropriateness of a high density residential mixed use development on the site.

The applicant argues that the proposal can be supported due to the high demand for residential housing; local employment profile and changes to industrial lands; and retail demand. The applicant argues that the proposal will assist in meeting residential targets for the LGA. The applicant also argues that the built form resulting from the proposal acts as a good transition between the adjoining buildings on Victoria Road down to the low scale residential landuses in the surrounding area.

As detailed in this Report, issues relating to employment, industrial and retail uses have been considered and the applicant's position is not supported (Sections 8.3 & 8.6).

The assessment of the appropriateness of this site for high density residential development should consider the following 3 key questions:

- Does this site enable an appropriate level of amenity for future residents of the site?
- Will a residential development on this site impact on the surrounding neighbourhood and locality?
- Is the site required to meet residential targets and should it be retained for industrial and other employment uses?

First, Council's urban designer has raised issue with the design in terms of amenity for future residents. Given the nature of the site, it is generally considered to be more suited to a light industrial use that provides for employment uses that do not require the levels of amenity demanded by residential uses.

Figures 27 & 28 demonstrate the dramatic change in levels within the site. Future residents on this part of the site will be directly adjoined by industrial uses on 2 sides with lower apartments receiving reduced amenity.



Figure 27: Site A looking north (Photo: Michael Woodland 2013)



Figure 28: Site A looking north east (Photo: Michael Woodland 2013)

Second, in relation to impacts on the surrounding neighbourhood and locality, it is acknowledged that the architectural studies have provided an indicative built form that both

transitions (in part) in height from Victoria Road and responds to the unique topographical features of the site.

Similarly, the proposed built form controls in the draft LEP/DCP provide a proposed framework for future development. It is considered that these controls (in particular height and FSR) do not provide an appropriate transition to adjoining low density residential development. It is also noted that the proposed scheme outlined in the architectural studies proposes an FSR of 2:1 for the 2-12 Tennyson Road Site, which is less than the 2.5:1. Although this is an indicative scheme, Council should give close consideration to the proposed FSR for the site and resultant development outcomes and likelihood on adverse environmental impacts on the surrounding locality.

However, the current transition to the adjoining residential dwellings is not considered to be appropriate on this site. Notwithstanding the proposed setbacks to adjoining properties and relative high architectural treatment of the indicative development outcomes, high density residential uses on this site do not provide an appropriate interface to the low density area and is considered to impact on the character and general amenity of the locality. In particular, the likely impact of traffic on the surrounding road network resulting from the proposal is considered to adversely impact the amenity of the area.

Third, the site should be generally retained for industrial / employment purposes. Council has indicated that it can exceed residential and employment targets in identified centres and other major approvals throughout the LGA. Council has recently revised its dwelling targets and estimates that due to a number of major development approvals and urban activation areas, it will likely exceed the 12,000 target for the LGA by the Subregional Strategy by providing over 34,467 additional dwellings.

#### *Summary*

Council's Planning Strategy encourages this type of development to be located in an identified centre within the LGA. It also should be noted that this is a planning proposal across 2 separate sites - not a development application. The architectural studies provide an indication of what **may** be achieved on the site resulting from relatively high levels of design and site planning.

In this regard, Council should carefully consider the proposed zoning, built form controls and details in the proposed LEP and DCP in relation to the appropriateness of high density residential uses on this site.

## 8.8. Other recent planning approvals in the locality

An increased amount of development activity is evident in the Gladesville Town Centre and Victoria Road Corridor following the making of the new LEP in 2010 (Figure 29). This demand was identified in the Local Planning Strategy. It is reasonable, in part, to attribute these outcomes from the new LEP and its initiatives in landuse planning and built form controls.

In addition, there are other major developments in the locality namely the Bunnings development on the opposite side of Victoria Road and major development at Ryde Aquatic Centre.

As identified in the Local Planning Strategy, Council can meet its residential and employment targets within its identified centres. The development activity detailed below indicates a level of investor confidence in the area and ability to deliver on these targets.

It is important that the proposal be considered in the context of these developments, which for the most part are delivering the aims and objectives of the new LEP for the Town Centre and Victoria Road Corridor. It is also acknowledged the need to diversify the employment uses at some strategic sites within the Gladesville Industrial Area along Victoria Road.

In this regard, although the proposal is not supported in its current form, it is reasonable to consider other employment generating uses that may be appropriate on the site.

## 8.9. Traffic

Traffic and associated issues are considered to be a critical issue in the consideration of the proposal. Any rezoning of the site to a mixed use development will likely lead to increased traffic from the site and impacts on the surrounding road network.

The proposal includes a traffic report in support of the rezoning. Council has obtained an independent review of the traffic impact assessment as part of the consideration of the proposal.

In particular, the traffic consultant was requested to carefully review the following aspects of the traffic report:

- Relevant assumptions and modeling used in the assessment
- Impacts on existing intersections, Victoria Road Corridor and local road network
- Accumulative impacts from other development in the surrounding locality
- Impact on the local road network and surrounding low density residential area
- Any traffic mitigation works required

It is acknowledged that any redevelopment of the site may result in additional traffic, however the impact on the local road network and the Victoria Road corridor from a mixed use proposal of this scale is a critical consideration. In particular, the impact on the both the local road network and surrounding low density residential areas and the intersection between Tennyson Road and Victoria Road are key considerations when assessing any rezoning for the site.

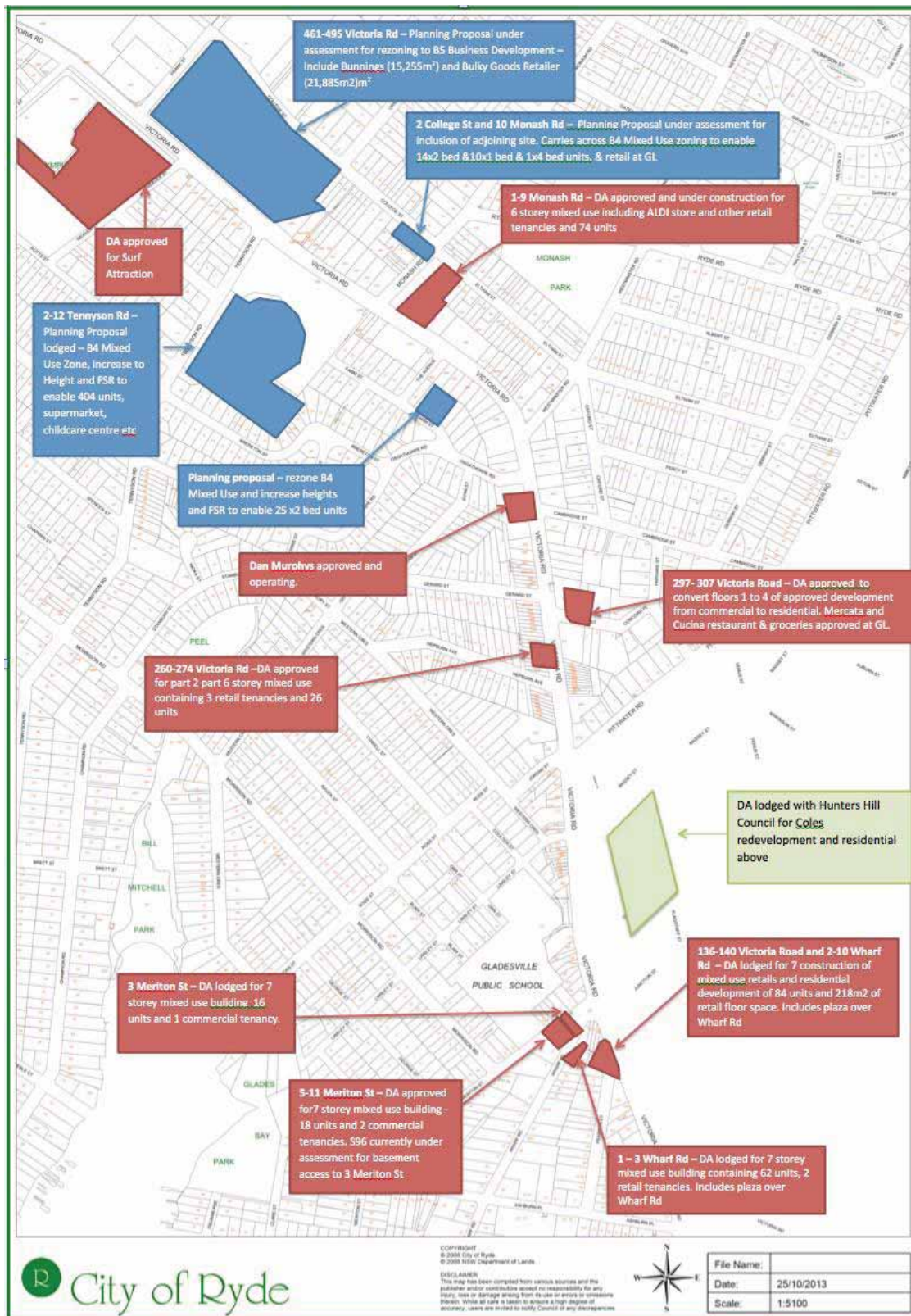


Figure 29: Recent development activity in the locality (Source: Ryde City Council)

## 9. Potential development outcomes (concept plan)

This Section of the report provides a high level analysis of the potential development outcomes identified as the preferred concept plan in the proposal, informed by the relevant Council officers.

It should be noted that as a planning proposal, this provides an indicative outcomes, which may be amended and will ultimately be subject to a separate development application.

In addition (as recognised in the architectural studies) the site consists of 2 separate parcels of land, which **may or may not** be developed as a single scheme.

### 9.1. Traffic

The proposed development options indicate potential for 2 levels of basement parking for 670 car spaces, loading and unloading areas across the Site. Vehicular access to the site is proposed via Tennyson Road, with options for a shared or separate vehicular access.

The planning proposal includes a traffic report in support of the proposal. In response to this issue, Council commissioned an independent review of the traffic impact assessment as part of the consideration of the proposal. In particular, the traffic consultant was requested to carefully review the following aspects of the traffic report:

- Relevant assumptions and modeling used in the assessment
- Impacts on existing intersections, Victoria Road Corridor and local road network
- Accumulative impacts from other development in the surrounding locality
- Impact on the local road network and surrounding low density residential area
- Any traffic mitigation works required

Following a review of the proposal, the independent traffic consultant (Attachment 2) has raised serious issues with the application on traffic grounds as detailed below:

#### *Traffic generation*

- The trip generation used by the applicant is significantly underestimated, which proposes 310 trips per hour compared with the RMS Guidelines of 678 trips. This is due to assumptions for retail shopping and multi-purpose trip discounts. Traffic generation should also consider whether the seniors living component were to be developed as residential uses. This is summarised in the report as follows:

*The proponents estimate traffic generation is at least 368 vehicle trips less than those recommended in the RMS Guidelines. Traffic surveys should be used to justify the variation from the published rates. This is largely attributable to the assumptions for the retail shopping rates and the discounts for multi-purpose trips (Bitizios Report; page 9).*

#### *Intersection performance (Tennyson Road and Victoria Road)*

- The key intersection analysed in Tennyson Road and Victoria Road. The report finds that when taking into account the Bunnings development on the opposite side of Victoria Road, the development will impact on this intersection as detailed below:

The results indicate that with the Bunnings development the intersection performance will drop from level of service A to C and with the proposed development, a further drop from C to D....

...The modelling for the Bunnings development at the Tennyson Road / Victoria Road intersection indicates that the Degree of Saturation would be 0.971 which is close to capacity. With the proponent's development traffic in addition, the Degree of Saturation would be greater than 1, which indicates the intersection is over capacity.

Traffix has argued that the results are for isolated intersection operation and that in reality there would be benefits of the signal coordination along Victoria Road which would create bunching of vehicles and reduced delays. This is true, and signalised intersections are located some 250m either side of Tennyson Road.

Notwithstanding the above, the results presented in the Traffix report do not demonstrate acceptable intersection operation as a result of the development....  
(Bitzios Report; page 9)

#### Queuing in Tennyson Road

- The Report finds that queuing in Tennyson Road as a result of the development is likely to exceed 107m, which will impact on the surrounding local road network. This is considered unacceptable, given it likely to lead to adverse impacts on the general amenity of the surrounding residential locality, in particular adjacent residential streets as detailed below:

With the proposed development and the Bunnings development, the Sidra model indicated a queue of 107m which would extend almost to the Searle Street roundabout. However, the degree of saturation at the Victoria / Tennyson intersection was predicted to be greater than 1, indicating the intersection was over capacity and therefore it is highly likely that the queues would be significantly longer than 107m on a regular basis.

If the queue were to extend through the Searle Street roundabout this would have significant impacts on traffic leaving the development as well as on general road congestion. Once a roundabout is blocked, other (generally light) traffic movements are significantly delayed. This would impact traffic entering and leaving Searle Street, in all directions. In turn, this could lead to more traffic filtering through adjacent residential streets like Potts Street and Weaver Street (Bitzios Report; page 10).

#### Impact on adjacent low density residential areas

- A key consideration in relation to traffic impacts is the potential impact from the proposal in the context of other major developments in the locality such as the Bunnings re-development and other recent approvals (Section 8.8). The Traffic review identifies a number of areas that are likely to be impacted by the development as detailed below:

In addition to the likely impacts at the Searle Street roundabout (as outlined in Section 4.8), the predicted additional 111 vehicle trips to Morrison Road would pass by the low density residences on Tennyson Road and would need to be accommodated at the Morrison Road / Tennyson Road roundabout. We note that Spencer Street and Warner Street are cul-de-sac. Brereton Street and Osgathorpe Road do not facilitate eastbound access to Victoria Road (for outbound trips), and we are aware that Council intends to install traffic management devices to discourage excessive

through traffic in these roads. These measures would discourage inbound trips to the development site (Bitzios Report; page 10).

#### *Adjacent developments*

- The review also notes that any consideration of a development of this scale should take into account other development in the locality. This includes a number of developments recently approved as part of the Gladesville Town Centre and Victoria Road Corridor LEP 2010 (Section 8.8). This indicates that when combined with these developments, the proposal is likely to increase impacts on Victoria Road, which in turn impact the adjoining road network as detailed in the review.

*From our previous reviews of developments in the area, it is estimated that the cumulative effects of these other developments could increase the background traffic growth in the area by some 5 to 10 % in the peak traffic periods. Further, the Gladesville DCP allows for higher density developments along the Victoria Road corridor. This would have a significant effect on the operation of traffic on Victoria Road in peak periods and should be considered in the context of this development (Bitzios Report; page 13).*

In conclusion, the Traffic Review does not agree with the conclusions in the Traffix Report accompanying the proposal as detailed below:

*Bitzios Consulting has reviewed the traffic report of the planning proposal for 2 – 14 Tennyson Road, Gladesville. From our review we conclude that:*

- *Traffic generation has been significantly underestimated without adequate justification;*
- *Discounting for linked and multi-purpose trips has not been adequately substantiated and therefore should not be used for new standalone developments;*
- *The modelling shows unacceptable increases in delays; and*
- *The Victoria Road / Tennyson Road intersection would be over capacity according to the Sidra results.*

*Should the estimated traffic generation be increased then the intersection average delay is likely to be higher than that reported in the Traffix report. No road improvements have been proposed in the report to ameliorate the issues.*

*We therefore do not agree with the conclusions of the Traffix report and consider the likely traffic impacts to be greater than those reported. It is concluded that the proposed development would significantly increase traffic congestion (Bitzios Report; page 17).*

## 9.2. Impacts on the surrounding locality

The proposal represents a bold departure from the current urban context of the industrial/commercial buildings on Victoria Road and the low-density residential development to the west.

Should the proposal be approved based on the proposed zoning and built form controls in the proposed LEP/DCP, it is considered that any future development is likely to lead to the following impacts on the surrounding locality:

- Increased traffic issues resulting in traffic congestion and delays at both Victoria Road and on the surrounding local road network
- Impact on the Gladesville Town Centre and set an undesirable precedent for use of employment lands in this locality
- Amenity issues for the adjoining residential properties in Brereton Street and Tennyson Road in terms of privacy, bulk and scale.

In view of the above, the site is considered to be more appropriate for employment uses in its role as part of the Gladesville Industrial Area. This cluster of urban services can also provide support for existing centres in the LGA. The proposed development options are considered to be out of character with the desired future character of both the adjoining residential area and the adjoining Monash Road Precinct (as part of the Gladesville Town Centre and Victoria Road Corridor Masterplan).

### 9.3. Built form, amenity and urban design

The application is a planning proposal and therefore due consideration should be given to the proposed key built form controls that would be incorporated into any new LEP covering the site, namely height and FSR controls. Other controls such as landscaped area and setbacks can be included in any future DCP for the site. Given the findings and recommendations in this report, particularly related to strategic planning and traffic grounds, a detailed consideration of the proposed controls in the Draft DCP provided by the applicant was not undertaken.

As detailed in Section 8.7 of this report, it is considered that this site is not suited to high density residential development of this scale and height and does not provide an appropriate transition to adjoining low density residential development. The resultant development based on controls of 2.5:1 has been found to lead to unacceptable traffic impacts on the local road network. Council should give close consideration to the proposed height and FSR for the site and resultant development outcomes and likelihood on adverse environmental impacts on the surrounding locality.

The site has unique topographical characteristics resulting from its previous use as a quarry and requires an appropriate design response. The proposal has responded to these site constraints in a scheme that is directly influenced from the circular cutting of the former quarry. In this regard, the location of the retail uses at the lower levels of the podium makes the best use of areas where future levels of acceptable residential amenity will be more difficult to achieve on the site.

Council's urban designer has undertaken a high level review of the proposal in terms of architectural and urban design issues. This analysis is generally supportive of the proposal and its response to the site. However, a number of design issues are raised including potential poor amenity of proposed lower units, streetscape on Tennyson Road and proposed open space.

Council's urban designer advises that the complete enclosure of the proposed open space within Site A is not supported as it is considered to lead to amenity impacts for lower residential apartments and impacts on the open space as a public area. In terms of streetscape, it is recommended that the area be further activated with retail uses.

Notwithstanding the above, the proposed height and FSR controls and likely resultant built form is not considered to be an appropriate to transition from the Victoria Road Corridor to



the low density residential development to the south. The proposed heights and FSR controls for the site are considered to result in a development that:

- does not respond as an appropriate transition zone;
- is out of character with the adjoining low density residential area in terms of scale, density and height; and
- is likely to lead have impacts on adjoining properties in terms of traffic issues.

#### 9.4. Environmental issues

The application was referred to Council's environmental and engineering section for comment.

##### *Contamination and environment*

The site has potential contamination, geotechnical and flooding issues. In addition, the issue of stormwater is a relevant consideration, given the potential impacts on adjoining residential properties. Council officers have reviewed the proposal in relation to these issues, in particular the provisions of SEPP 55 and Councils' Contaminated Land Policy and make the following comments:

*... The site has a long history of industry and quarrying activities. Note the Preliminary (Stage 1) Environmental Site Assessment Report prepared by EIS –Environmental Investigation Services only covers the site 2-12 Tennyson Road, and there is no investigation of 14 Tennyson Road.*

*The report has numerous limitations, including the data gaps identified in the report:*

- *no groundwater investigation,*
- *no sampling possible under existing buildings,*
- *no targeted investigation regarding the suspected UST,*
- *detailed investigation for asbestos contamination under paved areas and in deeper filled areas.*

*Overall the results of the sampling carried out indicted that the levels of most metals, hydrocarbons and other typical contaminates were generally below the soil assessment criteria.*

*The Report recommends additional investigation be carried out and in the opinion of EIS "the site could be made suitable for the proposed mixed-use development provided that the recommendations detailed in Section 10.6 of this report are suitably addressed." (Note this conclusion only covers 2 -12 Tennyson Road) ...*

*... Council has had issues in the past with stormwater from 14 Tennyson Road flooding the properties at the rear, and while this has been addressed, extensive development of the sites will need to ensure that this does not occur again. At this stage of the proposal Environmental Health do not object to the further investigation for the potential re-zoning of the sites.*

In addition, Council undertook a high-level environmental sustainability review of the proposal. This review focussed on building design sustainability, sustainable transport and water cycle management.

Council noted a number of inconsistencies with the Draft DCP between the objectives and the controls relating to building design and integrated water cycle management.

#### *Geotechnical*

Council's Engineer has undertaken a high level review of geotechnical issues. In general, Council has advised that excavation of the site to the boundary on the northern and eastern side of the lot appears difficult to achieve without imposing on the neighbouring properties (eg installation of rock anchors/ soldier piles). Council advises that the Geotechnical Assessment Report accompanying the application does not quantify the current stability/ risk of the exposed face, however it would appear there is ongoing erosion which would need to be stabilised by similar methods in the future.

Council advises that it is technically feasible to excavate the face further to the boundary under the full supervision of a geotechnical engineer however it would be prudent to have a setback of approx 2 metres to allow for any anomalies and reduced imposition on neighbouring properties in terms of construction logistics.

#### *Stormwater*

Council's Infrastructure Integration Team has undertaken a high level review of the proposal. Council advises that the site at 2-12 is subject to low to medium risk flooding. Council's advice is summarised below:

- The proposed density of the development is not directly related to stormwater designs. In this regard there will be no impact if the site is not filled and On Site Detention Storages are provided to compensate for the increased impervious areas.
- Underground basement car park may not be feasible. This is the critical issue that should be reviewed prior to any development.
- The developer is required to demonstrate how the drainage will be discharged from the site (2-12 Tennyson Rd) to the street before any future Development Application. This could be a major issue.
- There is currently a stormwater easement through 14 Tennyson Road property. The easement can be maintained or moved to cater for the proposed stormwater drainage design. Any existing flooding (ponding) on site should be addressed before any future Development application is lodged. The other stormwater matters can be dealt in the DA stage provided the site (2-12 Tennyson Rd) is not filled.

#### *Conclusion*

Generally it is considered that these issues may be resolved through an amendment to the Draft DCP or through the development application process. Based on the above comments, it is considered that further information is required to fully establish the environmental impacts of the proposal. However, given the broader strategic issues relating to landuse, traffic and built form it is not considered appropriate to further investigate these issues as part of this report.

## 10. Conclusion

The retention of industrial and employment lands in the Greater Sydney Metropolitan Area is a complex planning issue covering a range of planning, economic, social and environmental areas. While most contemporary planning policy seeks to focus major employment and residential development in centres, there is a legitimate need to review existing industrial sites, particularly within established urban areas.

These sites are often under pressure for changes to landuse, which in the current economic climate represents mixed use high density residential development.

The site forms part of the Gladesville Industrial Area, one of 2 remaining industrial areas in the Ryde LGA. Although this area represents 2.12% of the total employment area, these industrial lands have been recognised as being vitally important to the LGA as an automotive and construction based cluster of uses.

Although the proposal is accompanied by an interesting design response to a unique site, fundamentally it is not considered to be consistent with the future strategic direction as outlined in the Ryde Local Planning Strategy and other Government strategies due to the loss of industrial and employment lands.

Further, the proposal is inconsistent with the Ryde Draft Local Environmental Plan 2011, which seeks to retain the Light Industrial Zoning for the site. The site is not considered to be an appropriate location for high density residential development given its interface with the low density residential locality, in particular the likely traffic impacts on the surrounding road network.

The proposal is also considered to be inconsistent with a number of areas in the Draft Metropolitan Strategy and Ministerial Directions in relation to the retention of industrial and employment lands.

Council has demonstrated that it can meet its residential and employment targets for the LGA as set by the Draft Inner North Subregional Strategy without the need to rezone this site.

It is considered that the applicant has not justified the proposed built form controls for the site, with a resultant future development likely to lead to adverse impacts on the surrounding locality in terms of height, bulk and scale and traffic issues.

However, given the recognition of the difficulties faced by some landowners in Industrial Lands, it is considered reasonable for Council to continue to discuss alternative uses for other employment lands as part of a broader study of industrial lands as recommended in the Ryde Local Planning Strategy. This work should build on the additional uses Council has proposed in the Draft LEP 2011 and subsequent *housekeeping* draft LEP for the IN2 Light Industrial zone to encourage a wider range of employment uses.

## 11. Recommendation

- A. That the planning proposal for 2-14 Tennyson Road, Gladesville not proceed to a gateway determination for the following reasons:
1. The planning proposal is inconsistent with strategic direction of the Ryde Local Planning Strategy 2010, Ryde Draft LEP 2011 and Draft Subregional Strategy in relation to retention of industrial lands.
  2. The planning proposal is inconsistent with the Draft Metropolitan Strategy and does not meet the criteria under the Industrial Lands Strategic Assessment Checklist for rezoning of existing industrial land to other uses.
  3. The planning proposal is inconsistent with s117 Direction 1.1 – Business and Industrial zones and 7.1 – Implementation of the Metropolitan Plan for Sydney 2036.
  4. The planning proposal is likely to lead to adverse impacts on the amenity of the surrounding locality, particularly relating to traffic impacts on the surrounding road network.
  5. The proposed built form controls are generally not considered appropriate in this locality in relation to the adjoining low density residential areas.
- B. That Council give further consideration to additional employment uses specifically for the site in addition to the uses identified in the Draft LEP 2011 in consultation with the landowners.
- C. That Council undertake a further study of the industrial areas **within the Ryde LGA to develop strategies and recommendations to maintain these areas as viable employment lands** in accordance with Recommendation 7.2 of the Ryde Local Planning Strategy in consultation with landowners, the community and relevant industry groups.