

## ATTACHMENT 1 - PRCUTS IMPLEMENTATION PLAN OUT OF SEQUENCE COMPLIANCE TABLE

The site is outside the '2016 - 2023 Release Area' which means that its redevelopment should be between 2024 and 2054. Proposals that depart from this staging need to be considered against the 'Out of Sequence Checklist' to ensure that changes to the land use zones and development controls can be justified against the underlying Principles and Strategic Actions of the Strategy. These include provision of necessary transport, services and social infrastructure to service a new population. The Checklist also aims to ensure the Strategy's benchmarks for delivery of high quality of development and public domain outcomes.

For a Planning Proposal to be consistent with the Out of Sequence Checklist, it must demonstrate (without relying on any future development application) that it will:

- Satisfactorily meet **all** the underlying Principles and Strategic Actions of the Strategy; and
- Achieve the benchmarks for high quality development and public domain outcomes.

Table - 1 summarises how the Planning Proposal fares against the Checklist criteria. Table - 2 provides a detailed assessment.

*Table - 1 Out of Sequence compliance checklist*

Out of Sequence checklist criteria		Consistency	Comment
<b>** Note- For detailed analysis, refer to the comments in the subsequent table.</b>			
<b>Criteria 1 Strategic objectives, land use and development:</b>			
1.	The planning proposal can demonstrate significant delivery or contribution towards the Strategy's Corridor wide and Precinct specific vision.	<b>X</b>	The planning proposal is partially consistent with the strategic objectives as the proposed mix of spaces (creative employment and student housing) would help achieve the vision for the Camperdown precinct and the Corridor.  However, it exceeds the maximum recommended FSR which would result in a poor built form and it does not adequately contribute towards public domain improvements.
2.	The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfils the relevant Strategic Actions for each Principle.		
3.	The planning proposal can demonstrate significant net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located.		
4.	<i>4. The planning proposal is consistent with the recommended land uses, heights, densities, open space, active transport and built form plans for the relevant Precinct or Frame Area.</i>		
5.	The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy.		
6.	The planning proposal demonstrates design excellence can be achieved, consistent with councils adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines.		
<b>Criteria 2 Integrated Infrastructure Delivery Plan (IIDP)</b>			
An Integrated Infrastructure Delivery Plan, which identifies advanced infrastructure provision and cost recovery for the local and regional infrastructure identified in the Infrastructure Schedule, must support the planning proposal. The Integrated Infrastructure Delivery Plan must demonstrate a cost offset to council and agency costs for a set period that aligns with the anticipated timing for land development identified in the Implementation Plan 2016 - 2023. Infrastructure to be considered includes:		<b>X</b>	The proponent's IIDP is unsatisfactory and underquotes the costs of local infrastructure works.  Council's previous concerns on underestimated construction rates have not been resolved.  There is no evidence to support the proponent's claim that students will not
<ul style="list-style-type: none"> <li>• Public transport</li> <li>• Active transport</li> <li>• Road upgrades and intersection improvements</li> <li>• Open space and public domain improvements</li> </ul>			

<ul style="list-style-type: none"> <li>Community infrastructure, utilities and services.</li> </ul>		place a burden on local infrastructure.
<b>Criteria 3 Stakeholder engagement</b>		
1. Consultation and engagement with relevant stakeholders (council, government agencies, business, community, adjoining properties and user or interest groups, where relevant) have been undertaken, including any relevant pre-planning proposal engagement processes required by local council.	X	The proponent has not consulted the community/adjoining properties on the amended Planning Proposal.
2. An appropriate level of support or agreement is documented.		
3. Provision of documentary evidence outlining the level of planning or project readiness in terms of the extent of planning or business case development for key infrastructure projects.		The proponent has not provided an adequate level of documentary evidence defining the level of project readiness for the delivery of key infrastructure projects.
<b>Criteria 4: Sustainability</b>		
The planning proposal achieves or exceeds the sustainability targets identified in this Strategy.	✓	The proponent has committed to 4 - star green star rating, but additional information will be needed to demonstrate how this rating will be achieved.
<b>Criteria 5: Feasibility</b>		
The planning proposal presents a land use and development scenario that demonstrates economic feasibility with regard to the likely costs of infrastructure and the proposed funding arrangements available for the Precinct or Frame Area.	X	The proponent has demonstrated that the building would result in a net economic benefit; however he has failed to put forward a land use and development scenario that would make adequate contributions towards infrastructure.
<b>Criteria 6: Market viability</b>		
The planning proposal demonstrates a land use and development scenario that aligns with and responds to market conditions for the delivery of housing and employment for 2016 to 2023. Viability should not be used as a justification for poor planning or built form outcomes.	X	The proponent has suitably demonstrated the market demand for student housing, but the proposed FSR is excessive and would result in a poor built form.

Table - 2: Detailed analysis of Planning Proposal against the Out of Sequence criteria

<b>Out of Sequence Checklist analysis</b>
<p><b>1. The planning proposal can demonstrate significant delivery or contribution towards the Strategy's Corridor wide and Precinct specific vision.</b></p> <p>Whilst the proposal is inconsistent with the PRCUTS recommended R3 Medium density residential zoning, the proposed creative employment uses and student accommodation uses are supported as these would contribute to the Camperdown precinct's desired future character, future proof the precinct for long term strategic bio-hub related land uses and provide student housing.</p> <p>However, the proponent's design scheme does not provide adequate upper-level setbacks, transitions and articulations which would result in excessive bulk and scale and detrimental impacts on the town scape, amenity of the surrounding residents and the redevelopment potential of adjoining sites.</p> <p>The proponent has indicated that the 6m wide setback to Johnstons Creek could accommodate pedestrian/cycleway, but no guarantee is made to ensure that this setback would become a through site-link. Concerns were raised regarding this point in the previous assessment report but the issue persists in the amended planning proposal.</p> <p>The through site-link is a critical part of the recreational corridor along Johnstons Creek. Council is currently exhibiting its Parramatta Road Corridor Urban Improvement Plan for the Camperdown precinct prepared in collaboration with the State government which provides details of the proposed pedestrian and cycle path along the corridor.</p>
<p><b>2. The planning proposal satisfies the Strategy's seven land use and transport planning principles and fulfils the relevant Strategic Actions for each Principle.</b></p> <p>The following is Council's assessment against the PRCUTS corridor wide and precinct specific visions.</p> <ul style="list-style-type: none"> <li> <p><i>Housing choice and affordability</i></p> <p><b>Officer's Comments:</b> The proposal contributes towards housing choice through the provision of student housing which would support the surrounding educational institutions. However, there are concerns regarding the affordability of student housing as there are no means to ensure that any of the student housing would be available at lower market rental. Whilst the 'new gen' boarding houses are delivered under the Affordable Housing Rental SEPP (ARHSEPP), these are not traditional boarding houses and do not offer significantly affordable options when compared to the mainstream private rental market.</p> <p>The extract from a recently completed study for Southern Sydney Regional Organisation of Councils (SSROC) of 'Occupant Survey of Recent Boarding House Developments in Central and Southern Sydney' analyses whether or not new boarding house rooms are a satisfactory long-term accommodation option. The extract shows that:</p> <p><i>"...new boarding house developments do not offer a significantly more affordable housing option, compared with other options on the private rental market. Yet most residents (64%) were on low incomes (&lt;\$800 per week), nearly all (90%) of whom were paying more than a third of income on rent, and so classified as being in rental stress. Overall, at least two thirds (and potentially as high as four fifths) of occupants were in rental stress. This suggests that this form of accommodation is not suitable for most current occupants over the longer term. This form of accommodation is also not suitable for those identified as in need of affordable housing – such as those on social housing waitlists, those excluded from mainstream rental markets or those seeking transitional housing."</i></p> <p>Given these findings, the provision of another 'new gen' boarding house should not be seen as a truly genuine addition to the affordable housing stock.</p> <p>In its preliminary assessment letter, Council requested the proponent to consider transferring the units to a community housing provider or to agree to keep the rents</p> </li> </ul>

below market rates in perpetuity. The proponent declined this request on the grounds that the ARHSEPP does not require a boarding house to be managed by community housing provider.

In the absence of appropriate mechanisms for Council to ensure affordable rents, the boarding house component of the proposed development will have to be assessed under the ARHSEPP and considered as a form of affordable housing. Potential mechanisms to ensure that the rents are maintained below market rental rates may be explored through VPA negotiations.

- *Diverse and resilient economy*

**Officer's Comments:** The amended planning proposal intends to retain the existing industrial zoning to provide creative offices and modern industrial spaces. The employment uses are supported in principle as these would support the creation of a future biotechnology hub in the Camperdown precinct. However, the proposed 0.75:1 FSR for employment uses would result in a loss of theoretical extent of light industrial floor space which could be delivered under the existing controls (LLEP FSR - 1:1).

The proposed minimum non-residential floorspace (FSR 0.75:1) equates to 980sqm GFA which could support 65 - 98 jobs as claimed by the proponent. The proposed number of jobs is unclear as the proponent has used an average of 10 - 15 sqm of space per employee which resonates with commercial office spaces, for uses like a bank/ call centre rather than creative office spaces in an inner-west area.

There are also concerns regarding the proposed typology of creative offices as it mostly reflects traditional office spaces with 3m floor to ceiling height and range between 58sqm to 125sqm which is considered inflexible to accommodate evolving creative uses which generally require larger floor plates and floor to ceiling heights.

Priority 8 of the Camperdown-Ultimo Collaboration Area Place Strategy outlines the importance of supporting the role and function of employment lands in this precinct. The proposal intends to retain the industrial zoning and replace urban services with commercial office spaces.

If deliberately limited to innovation, research and education uses; the proposed office spaces would support the transformation of Camperdown employment lands into a biotechnology hub.

The Proposal remains inconsistent with the following strategic actions:

*Planning for jobs*

- *Update Local Environmental Plan(s) to permit a wider range of employment uses, consistent with the recommended land uses, heights and densities identified in the Parramatta Road Corridor Planning and Design Guidelines. This includes:*
  - *tailoring commercial and business zones to provide greater flexibility and opportunity for the establishment of new business models particularly for small to medium business enterprises*
  - *facilitating increased densities to encourage the co-location of multiple uses in one building, including industrial functions, where appropriate.*
- *Implement the built form controls identified in the Parramatta Road Corridor Planning and Design Guidelines to encourage new typologies that overcome these challenges and facilitate evolving and innovative employment uses.*
- *Actively explore and promote the use of the adaptable building design to enable a range of uses over time, and likely transitions in consumer preferences,*

**Principle 3: Accessible and connected**

The proposal is inadequate in the following ways:

- Comes in advance of the precinct-wide traffic study currently being prepared in collaboration between DPIE, Council and TfNSW which will inform the preparation of IIDP for Out of Sequence Planning Proposals and provide considerations for future public transport, road and intersection upgrades required to service new developments within the corridor.
- For the moment, it may impede with Council and State government's vision to deliver an active transport link along Johnstons Creek corridor.

The proposal's intention to provide low car parking spaces is supported with 0 car spaces for the student accommodation. The proposal relies on the current parking rates in Leichhardt DCP to service the employment uses. These are higher than the recommended PRCUTS parking rates (16 vs 7). The lower PRCUTS car parking rates are preferable for this site in this location.

Whilst it is acknowledged that the proposed development is small and will not result in significant adverse traffic impacts, there are concerns regarding potential cumulative impacts of such ad-hoc developments in the corridor. Although the proposal includes reduced car parking rates, it relies on the public transport infrastructure including the future high-capacity transport along Parramatta Road and comes in advance of any such transport improvements/ commitments made to the Corridor and therefore, remains 'out of sequence'.

In principle, Council acknowledges the proponent's traffic assessment that it would be unlikely for any adverse parking or traffic generation impacts to arise from the proposed development and that the site is adequately serviced by existing public transport infrastructure. However, concerns regarding the cumulative development in the corridor are unresolved and more specifically, whether the existing infrastructure can readily support developments in the first phase 2016 - 2023 as the proposal, in theory, may compete with developments in the 2016-2023 release area.

Council's Transport Planning officer has provided further comments on the proponent's transport/ traffic study:

- The traffic study does not consider the actual traffic counts and bases its existing traffic analysis on theoretical assumptions.
- It is unclear whether the intersection analysis takes into account the deferred construction of the cycleway along Chester Street as proposed in Council's Parramatta Road Corridor Urban Amenity Improvement Plan for Camperdown precinct.
- The traffic study claims that the WestConnex dive site would not have any unacceptable traffic implications. This cannot be adequately demonstrated until the completion of PRCUTS precinct-wide traffic study. It is likely that the traffic would divert from Parramatta Road and Mallett Street and tend to cause congestion on nearby local roads.

The proposal also comes in advance of the following steps to be actioned by the State Government.

*Integrated transport network*

- *Implement the Sydney CBD to Parramatta Strategic Transport Plan.*

#### *On-street rapid transit for Parramatta Road*

- *Amend the State Environmental Planning Policy (Infrastructure) 2007 to identify Parramatta Road between Burwood and the Sydney CBD as a strategic corridor, inserting provisions that require planning proposals and development applications along the Corridor to be referred to Transport for NSW for comment, particularly at and around future superstop locations.*

#### **Principle 4: Vibrant Communities and Places**

The proposal remains inconsistent with the following strategic actions:

##### *'15 minute neighbourhoods'*

- *Deliver each Precinct along the Corridor as a '15 minute neighbourhood' through land use changes that implement the following principles:*
  - *improved walkability, cycling and safety to support healthier communities*
  - *increased usability of, and access to, safe open spaces*
  - *adequate local services and infrastructure*
  - *access to public transport.*

##### *Design Excellence*

- *Prepare and implement a design excellence strategy* - The proposal fails to achieve design excellence as discussed throughout the report.

#### **Principle 5: Green Spaces and Links**

Council supports the proposed increase to the setback along Johnstons Creek from 3m in the original planning proposal to 6m in the amended proposal. The increased setback has the potential to provide a pedestrian and cycle link along the corridor. However, as discussed earlier, no provisions have been made to ensure that this setback is made available for future community use as a through site-link.

#### **Principle 6 : Sustainability and resilience**

The proposal has committed to 4-star green star rating however, insufficient information has been provided to ascertain how the sustainability targets would be met.

#### **Principle 7 : Delivery**

The proposal is premature as it comes in advance of precinct-wide traffic study and IWC infrastructure contributions plan that would provide a holistic methodology to determine local infrastructure contributions for the redevelopment in the PRCUTS corridor. There are also concerns regarding the proposed infrastructure contributions made under the proponent's IIDP as it has underestimated the contribution rates significantly.

Consequently, the Proposal is inconsistent with the following PRCUTS strategic actions:

##### *Effective Governance:*

- *Implement the Implementation Plan 2016 - 2023.*

*Funding arrangement:*

- *Establish a robust funding mechanism to apply to new rezoning/development proposals that will fund the local and regional infrastructure demands required to service the future population growth in the renewed Corridor*

**3. The planning proposal can demonstrate significant net community, economic and environmental benefits for the Corridor and the Precinct or Frame Area within which the site is located.**

The proposal has the potential to contribute towards economic productivity as it would retain a certain level of employment space to facilitate creative uses. Additional information is required to demonstrate how this part of the proposal would provide flexible creative spaces to support a variety of employment uses or contribute towards affordable creative spaces to support the wider vision of the Camperdown Innovation precinct and biotechnology hub.

The proposed student housing could potentially offer social benefits as the site is located close to key educational institutions, however there are concerns that the proposal has not considered any form of affordable housing or provisions to ensure that some of the student housing would be provided below market rent in perpetuity.

The proposal fails to provide any environmental benefit as it does not provide a through site-link to facilitate the active transport corridor along Johnstons Creek.

Overall, the proposal fails the 'net community, economic and environmental benefit' test.

**4. The planning proposal is consistent with the recommended land uses, heights, densities, open space, active transport and built form plans for the relevant Precinct or Frame Area.**

The proposal remains inconsistent with the proposed density, open space, active transport and built form recommendations for the Camperdown precinct.

Council had raised numerous concerns regarding the overdevelopment of the site in the original planning proposal assessment. The proposed FSR and built form is even larger than that was proposed previously and continues to be a significant issue.

The proposal presents significant urban design issues which have been confirmed through the independent peer review undertaken by Architectus (Attachment 4).

The following table provides a comparison of the proposed built form with the PRCUTS recommendations:

<b>Control</b>	<b>PRCUTS recommendation</b>	<b>Proposed</b>	<b>Officer's Comments</b>
Land use	R3 Medium Density Residential – Focus residential development on students, key workers and affordable housing (Key Action 3, Camperdown	Retain existing IN2 Light Industrial and allow boarding house as an additional permitted use.	<b>Not consistent but supported.</b>  The proposed land uses are supported in principle as discussed previously.

	Precinct , Pg. 117 PRCUTS)		
Density/ FSR	1.5:1	2.75:1 with a minimum FSR of 0.75:1 for employment uses such as creative offices, education, health and innovation uses and a maximum FSR of 2:1 for Boarding House exclusively for Students.	<p><b>Not consistent.</b></p> <p>The proposal seeks to reduce the maximum FSR for employment uses from 1:1 to 0.75:1 and apply a bonus floor space provision of 2:1 to enable student housing on the site.</p> <p>As discussed previously, the proposed FSR is excessive and not supported.</p>
Height	17m or 4 storeys	17m or 6 storeys	<p><b>Partially consistent</b></p> <p>The proposal is within the PRCUTS recommended 17m height limit, however PRCUTS envisages 4 storeys within the 17m height. The proposal is for 6 storeys, which is not supported.</p> <p>Although the 17m height limit may be appropriate for the site, the proposed 6 storeys cannot be achieved within the height limit if the proposed employment uses were to be provided with an increased floor to ceiling height to accommodate the desired flexibility for employment uses. Architectus's built form confirms that a 17m height limit with 5 storeys is more appropriate for this site and surrounding context.</p>
Open space and active transport	<ul style="list-style-type: none"> <li>• Green and embellish the currently underutilised land along Johnston's Creek to create a significant new regional green link accommodating cycling and pedestrian links.</li> <li>• Provide new and improved pedestrian links to improve permeability and provide additional north-south and east-west connections at Chester Street.</li> <li>• Provide new or upgraded cycling links to provide and improve connectivity and close missing gaps in the network along Johnston's</li> </ul>	6m setback along the site's northern edge along Johnston's Creek	<p><b>Partially Consistent</b></p> <p>The proposed 6m setback to Johnstons Creek is appropriate as it provides a better interface to the creek. However, at this, the proposal fails to guarantee that this space would be a through site-link as discussed previously.</p>

	Creek between Matheison Street (Parramatta Road) and Booth Street.		
Built Form	<ul style="list-style-type: none"> <li>• Preserve the zero lot setbacks in the northern parts of the Precinct consistent with the PRC Fine Grain Study.</li> <li>• Upper level setbacks could be provided in the northern part of the Precinct of Parramatta Road so long as the predominant scale and street wall is preserved at the ground and first floors.</li> <li>• Provide setbacks consistent with Section 4 of the Guidelines in all other areas of the Precinct and Frame Area.</li> <li>• Preserve a built for transition consistent with Figure 12.10 to any open space to ensure than 50% of the open space will receive a minimum of 3 hour direct solar access between 11am and 3pm on 21 June.</li> <li>• Provide appropriate built form transitions for all other new development consistent with the PRC Fine Grain Study, September 2016 to existing built form.</li> </ul>	Refer to the proposed urban design scheme	<p><b>Not Consistent</b></p> <p>The proposed FSR is excessive. The proposed bulk, form and scale of the development are too large for the small site and its immediate context. The continuous perimeter building interfaces poorly with its neighbours and would have adverse amenity impacts on the surrounding area.</p> <p><i>Interface to Johnstons Street creek frontage:</i></p> <p>Dwellings to the west are of a low scale with back gardens facing the site:</p> <ul style="list-style-type: none"> <li>• The 6 storey street wall does not provide a good transition to these neighbours.</li> <li>• The 4 levels of residences oriented to this frontage will directly overlook the neighbours from a short distance with adverse poor amenity impacts. Oblique views from the neighbouring properties may also be blocked.</li> </ul> <p><i>Interface to Chester Street frontage:</i></p> <p>PRCUTS highlights the importance of relating building height to street width and intended character.</p> <ul style="list-style-type: none"> <li>• A 5 storey street wall on Chester Street which is a narrow laneway provides minimal separation (11m) to the site on the other side of the street.</li> <li>• That adjacent site is proposed for open space in the PRCUTS, and 11m would not provide sufficient separation to such an open space or indeed for a similar redevelopment (ADG requires 18m above 4 storeys for habitable to habitable).</li> </ul> <p><i>Interface to adjoining lot to north east:</i></p> <p>The proposal does not adequately consider its relationship with the adjacent lot and would result in potential land use conflicts between industrial and residential uses, and while also hindering the redevelopment potential of this lot.</p>

			<p>The separation to this adjacent site is not appropriate. While the boarding house units are oriented away from this direction, the south west facing residential corridor has nil to minimal separation to this adjacent lot.</p> <p>The proposal does not provide increased floor to ceiling height for those levels for industrial uses to allow flexibility. There are no provisions to allow large vehicles to service the employment uses.</p> <p>The proposal does not provide sufficient communal open space for the boarding house.</p> <p>The proponent was requested to clarify the GFA calculations and provide a detailed breakdown of FSR for the non-residential and residential component. Architectus's built form testing indicates that the proposal would achieve 0.86:1 FSR for industrial uses and 1.67:1 for residential uses with an FSR of 2.5:1. The proponent declined to provide further information to clarify these calculations on the basis that detailed calculations could be reviewed at the DA stage. Council disagrees as in the instance of this proposed development, the split of non-residential to residential FSR is dictated by the building design and forms a critical component of the planning proposal. If the proposal is to be considered for support by Council, the building envelope would form part of the site-specific DCP controls and therefore, an adequate level of detail is required to ensure that there will not be any issues in delivering the proposed built form at the DA stage.</p> <p>There are also discrepancies between the plans/sections and the artist's impression does not give an accurate picture of the proposed design.</p>
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*5. The planning proposal demonstrably achieves outcomes aligned to the desired future character and growth projections identified in the Strategy.*

The proposal remains inconsistent with the proposed dwelling projections of the Camperdown precinct in the short term. The proposal could potentially contribute towards the long term dwelling projections of the precinct, however, currently in the NSW planning system boarding houses are not counted as dwelling numbers and therefore, it's questionable whether the proposed development contributes towards any residential projections.

This creates further concerns for Council - if the boarding house units are not counted as dwellings, these are not being accurately accounted for in any local/ state infrastructure forecasts and therefore, would continue to be an unplanned for burden on current/future infrastructure.

The proposal does not align with the staging identified in PRCUTS but could potentially contribute towards employment projections in the short and long term. The exact number of jobs cannot be ascertained as the proponent's work space ratio of 10-15 sqm per worker is considered to be too high for the proposed creative uses in the inner-west area.

6. The planning proposal demonstrates design excellence can be achieved, consistent with councils adopted design excellence strategy or the design excellence provisions provided in the Parramatta Road Corridor Planning and Design Guidelines.

The proponent has committed to design excellence through the VPA. However, the proposed built form fails to demonstrate a good built form or design outcome.

### Criteria 2 – Integrated Infrastructure Delivery Plan

*An Integrated Infrastructure Delivery Plan, which identifies advanced infrastructure provision and cost recovery for the local and regional infrastructure identified in the Infrastructure Schedule, must support the planning proposal. The Integrated Infrastructure Delivery Plan must demonstrate a cost offset to council and agency costs for a set period that aligns with the anticipated timing for land development identified in the Implementation Plan 2016 - 2023. Infrastructure to be considered includes:*

- *Public transport*
- *Active transport*
- *Road upgrades and intersection improvements*
- *Open space and public domain improvements*
- *Community infrastructure, utilities and services.*

The Planning Proposal is accompanied by an Integrated Infrastructure Delivery Plan (IIDP) which provides a methodology for calculating local and state infrastructure contributions. The proponent has offered to make contributions towards infrastructure as part of the Planning Proposal/ VPA which are benchmarked against the Leichhardt Section 7.11 Contributions plan and offered in lieu of the local infrastructure contributions.

The proponent's IIDP is unclear as to what contributions would be made for the preferred boarding house option as it goes into more detail for the market housing option. However, in calculating the infrastructure contributions, it refers to the Leichhardt S7.11 contributions Plan which currently exempts boarding houses from making developer contributions under Part 1 Open Space and Recreation and Part 2 Community Facilities and Services. Contributions are collected under Part 3 - Transport which have not been considered in the proponent's IIDP.

It is assumed that in the absence of any contribution rates applying to boarding houses, the proponent would rely on the PRCUTS Infrastructure Schedule to make cost offset to Council and State agencies. In its assessment of the original 2018 Planning Proposal, Council had raised concerns regarding the proponent's unrealistically low cost estimates for the proposed local infrastructure works as well as the outdated PRCUTS 2016 costs which were originally compiled in 2014 and need to be updated. The proponent continues to use the original rates and has failed to address Council's concerns relating to the underestimated costs.

Council continues to be of the view that the PRCUTS's Infrastructure Schedule cannot be readily applied to determine accurate infrastructure contributions as Council and State Government have not yet completed the studies necessary to update the 2016 cost estimates or capture the costs of infrastructure which have not been covered by the Schedule.

Council has also recently prepared its Camperdown Public Domain Masterplan/ Urban Amenity Improvement Plan which outlines the probable costs for the new north-south pedestrian and cycle link along Johnston Creek and public domain improvements and cycle connection on Pymont Bridge Road. According to this masterplan, the cost of constructing a new north-south pedestrian and cycle connection along Johnstons Creek from Booth Street to Parramatta Road is \$2,933,087 (including design, and construction contingencies but excluding GST) compared to the \$150,450 estimated by the proponent.

Similarly, the proposed cost of construction for the public domain improvements and cycle connection to Pymont Bridge road between Parramatta Road and Mallett Street is \$2,300,087 (including design and construction contingencies but excluding GST) against the \$68,850 estimated by the proponent.

Project Name	PRCUTS estimated	Council estimated (excl. GST)	Proponent estimated	Difference	
				\$	%
New North-south pedestrian and cycle connection along Johnstons Creek from Booth Street to Parramatta Road	To be completed by the proponent	\$2,933,087	\$150,450	-\$2,782,637	1949.54%
Public domain improvements and cycle connection to Pyrmont Bridge road between Parramatta Road and Mallett Street	To be completed by the proponent	\$2,300,087	\$68,850	-\$2,231,237	3340.72%

As indicated, the proponent's estimated costs of works are extremely low. Whilst Council has progressed the UAIP and has detailed costs for these projects, the infrastructure costs for other projects cannot be ascertained yet until the relevant studies are completed.

Previous concerns regarding the timing and sequencing of this proposal persist as it comes in advance of studies underway at local and State government levels to ascertain what future infrastructure works will be necessary in the Corridor including the preparation of traffic study to determine the cumulative traffic impacts that will follow from implementation of the Strategy and infrastructure upgrades required to support the growth.

Council also has concerns about using the Leichhardt S7.11 Contributions Plan methodology to calculate local infrastructure contributions. The Leichhardt Developer Contribution Plans which exempt boarding houses from making contributions towards infrastructure was prepared in 1995 and is out-of-date. It does not accurately capture the likely impact of boarding houses on infrastructure. There are large differences in how each former Council calculates developer contributions rate in that the Marrickville Contributions Plan would have required a contribution of \$726,197.71 for the boarding house component costed at 8,749.37 per person.

Council is yet to harmonise its development contributions plans and prepare an Inner West S7.11 Contributions Plan which would determine the level of monetary contributions required for infrastructure works including delivery of new open space, active movement corridors, road upgrades, provision of recreational, community and cultural facilities etc, including specific provisions for the Parramatta Road Corridor.

The proposal intends to vary the PRCUTS recommended density by 83.33% and does not take into account the impact of such variation to density on infrastructure alongside wider impacts if such a variation was to become a precedent for other sites in the Corridor.

The proponent's justification for a low local contribution is based on the claim that future students would utilise open space and recreational facilities on the university campus not local infrastructure. Evidence to support the claim for diminished reliance on local infrastructure has not been provided. Council does not support this approach as it is of the view that boarding houses are a form of residential accommodation and would use existing infrastructure, open space, utilities and services.

### Criteria 3 Stakeholder Engagement

*Consultation and engagement with relevant stakeholders (council, government agencies, business, community, adjoining properties and user or interest groups, where relevant) have been undertaken, including any relevant pre-planning proposal engagement processes required by local council.*

The proponent undertook preliminary stakeholder consultation as a part of the original Planning Proposal. However, this report has not been updated for the amended planning proposal indicating that the community/adjoining neighbours have not been consulted for the proposed amendments to land uses.

*An appropriate level of support or agreement is documented.*

The proposal has provided sufficient level of documentation to support the proposed land uses with the exception of an updated community engagement report. State Agency (Transport for NSW, Roads and Maritime Services) concerns relating to the proposal coming in advance of precinct-wide traffic study remain unresolved.

*Provision of documentary evidence outlining the level of planning or project readiness in terms of the extent of planning or business case development for key infrastructure projects.*

There is no detailed planning or business case evidence that supports any key infrastructure projects along the Parramatta Corridor and is, therefore, inconsistent with this criteria.

#### **Criteria 4 Sustainability**

*The planning proposal achieves or exceeds the sustainability targets identified in this Strategy.*

The proponent has committed to a 4-Star Green Star Building through a Voluntary Planning Agreement but inadequate information has been provided to demonstrate how this would be achieved to exceed the sustainability targets recommended in PRCUTS. It is also desirable that the sustainability provisions be incorporated in the LEP and DCP rather than VPA as the purpose of VPAs is to provide voluntary contributions towards public amenities and services, affordable housing etc. The proposed sustainability targets do not qualify as public benefit.

PRCUTS recommends BASIX Energy 40 and BASIX Water 50 for new dwellings in apartment buildings over 6 storeys. Smaller scale non-residential development is governed by the National Construction Code, and should demonstrate consistency with relevant requirements of the code. Insufficient information has been provided to determine how the proposal would achieve or exceed these targets through a 4 star green star rating.

The proposed design indicates 18 car parking spaces -13 non-residential spaces, 1 manager's space, 1 courier space, 1 service vehicle space and 2 disabled spaces. No residential car parking spaces are proposed. Whilst the reduced car parking is supported, the proposed car parking rates are still higher than PRCUTS which recommends 7 spaces for the non-residential component of the development. Should the proposal proceed to Gateway, it is recommended that the car parking be reduced to comply with the PRCUTS recommendations. In addition, more emphasis be given to providing quality end of trip facilities and travel plan incentives to encourage students and employees to use public and active transport.

The future DCP of the site must incorporate landscape requirements including new moderate/ large sized street trees along the Chester Street and Johnstons Creek frontage, Water-Sensitive Urban design treatment along the site's northern and western boundary and a through site link along the Johnstons Creek frontage to contribute suitably towards the PRCUTS sustainability objectives.

Other recommendations include:

- Provide infrastructure or the capacity for EV charging points, including appropriate charging outlets in each parking space
- Future proof the development for recycled water use

#### **Criteria 5 : Feasibility**

*The planning proposal presents a land use and development scenario that demonstrates economic feasibility with regard to the likely cost of infrastructure and the proposed funding arrangements available for the Precinct or Frame Area.*

The proponent has submitted inadequate information in this regard. As discussed under Criteria 2, the proposal does not make adequate funding contributions towards infrastructure and fails to present an economically feasible land use and development scenario which would support the redevelopment of the Camperdown precinct.

#### **Criteria 6: Market Feasibility**

*The planning proposal demonstrates a land use and development scenario that aligns with and responds to market conditions for the delivery of housing and employment for 2016 to 2023. Viability should not be used as a justification for poor planning or built form outcomes.*

The proponent has provided an Economic Impact Assessment, prepared by AEC, (Attachment 15) that includes market demand analysis which demonstrates strong demand for student housing and higher density employment space. Additionally a letter has been provided by University of Technology Sydney (Attachment 16) which confirms that there is demand for purpose built student accommodation and employment space in the area to service the education sector. However, the proposed density, bulk and scale are excessive for such a small site and would result in adverse impacts on the surrounding area, for the future residents of the development as well restricting the redevelopment potential of the surrounding area. The proposed boarding house should not be supported at the cost of poor built form outcomes.