Attachment A3

Alternative Use Assessment – Parramatta Road Precinct

Alternative Use Assessment

Parramatta Road, Forest Lodge

July 2026
Prepared for: City of Sydney

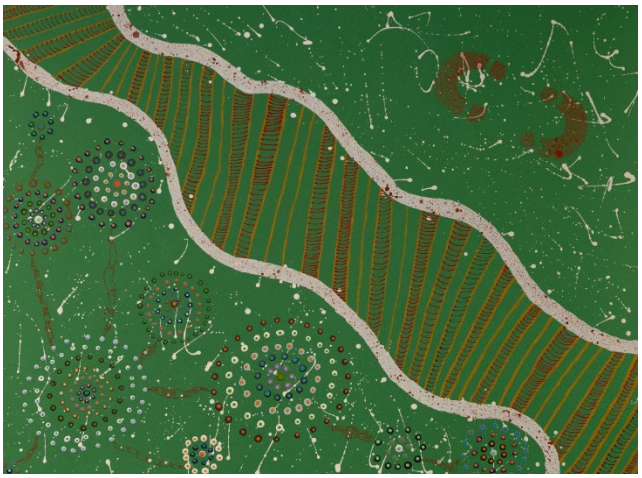
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The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Executive Summary

This Alternative Use Assessment has been prepared on behalf of the City of Sydney ("The Proponent"). The Proponent is preparing a planning proposal in respect of a site comprising multiple adjoining land parcels along Parramatta Road, Arundel Street and Ross Street, Forest Lodge ("subject site"), in the Sydney local government area ("LGA").

Table E.1 – Properties Comprising the Subject Site

Address	Lot and DP
64 Parramatta Road, Forest Lodge	▪ Lot 1 DP30884
62 Parramatta Road, Forest Lodge	▪ Lot 2 DP30884
60 Parramatta Road, Forest Lodge	▪ Lot 201 DP746742
58 Parramatta Road, Forest Lodge	▪ Lot C DP438920
56 Parramatta Road, Forest Lodge	▪ Lot 5 DP30884
54 Parramatta Road, Forest Lodge	▪ Lot 6 DP30884
52 Parramatta Road, Forest Lodge	▪ Lot 1 DP60080
50 Parramatta Road, Forest Lodge	▪ Lot 2 DP1275257
40 Parramatta Road, Forest Lodge	▪ Lot 7 DP30884
36 Parramatta Road, Forest Lodge	▪ Lot 8 DP30884
1–3 Ross Street, Forest Lodge	▪ Lot 16 DP447083 ▪ Lot 17 DP447083 ▪ Lot 14A DP447083 ▪ Lot 15A DP447083
50 Arundel Street, Forest Lodge	▪ Lot 1 DP1275257
26 Arundel Street, Forest Lodge	▪ Lot A DP966001 ▪ Lot B DP966001 ▪ Lot C DP966001 ▪ Lot G DP966001 ▪ Lot 2 DP104969 ▪ Lot 1 DP112049 ▪ Lot D DP966001
30 Arundel Street, Forest Lodge	▪ Lot E DP966001 ▪ Lot F DP966001

Among other changes, the planning proposal will amend the zoning of the subject site from E3 Productivity Support to MU1 Mixed Use and enable the development of residential uses above non-residential uses (i.e. retail and employment uses). For the purposes of this study, 25,000 sq.m of non-residential floorspace, equivalent to no less than 1.5:1, is assumed to be retained on the subject site. Under the NSW Government's

draft *Statewide Policy for Industrial Land* ("draft policy"), this would be considered the introduction of an "alternative use".

Therefore, in accordance with the draft policy (where the subject site is categorised as "locally significant"), an Alternative Use Assessment must be undertaken to assist in determining whether the planning proposal should be approved. Alternative Use Assessments are required to address the following considerations:

- Strategic alignment
  - Consideration 1 – Alternative use identification
  - Consideration 2 – Alternative use alignment with zoning objectives
- Economic alignment
  - Consideration 3 – Supply and demand of industrial land
  - Consideration 4 – Economic contribution and proximity
- Viability and connectivity
  - Consideration 5 – Viability and connectivity assessment
  - Consideration 6 – Adjoining industrial land impact assessment
- Public benefit
  - Consideration 7 – Public benefit assessment.

As stated in the draft policy, it is not necessary to satisfy all criteria to be considered for an alternative use. Rather, these criteria serve as a guide for planning authorities when determining if the planning proposal should be approved.

Table E.2 summarises the findings of this assessment in relation to each consideration listed above.

Table E.2 – Summary of Alternative Use Assessment Findings

Consideration		Key Findings
Strategic Alignment		
1.	Alternative use identification	The proposed alternative use for the subject site (in particular residential, but also broader range of retail uses) is broadly consistent across a range of objectives outlined in the State's strategic planning framework and associated policies, and with the City of Sydney's local strategic planning framework through its support of housing supply, mixed-use renewal, access to services, and continued economic activity on a well-located urban site.
2.	Alternative use alignment with zoning objectives	A planning proposal is required to facilitate the proposed alternative uses through rezoning the subject site to MU1 Mixed Use.
Economic Alignment		
3.	Supply and demand of industrial land	While there is considered to be moderate underlying demand for industrial uses at the subject site, this demand would likely be better accommodated elsewhere, in areas where there are more convenient and concentrated clusters of light industrial and urban services uses. This is in contrast to the subject site, which does not enjoy agglomeration benefits due to its relative fragmentation. The subject site, as with the other pockets of transitioning employment land along Parramatta Road, are largely no longer fit-for-purpose and do not support the corridor's resident-oriented transformation. Overall, the rezoning will have a limited impact on the broader take-up of industrial land within the local area or wider Sydney LGA.

4.	Economic contribution and proximity	The existing uses at the subject site make a significant economic contribution by: ▪ Directly supporting 573 on-site jobs and indirectly supporting 207 jobs across the Sydney LGA, rest of Greater Sydney and rest of NSW ▪ Playing an important role in supply chains across NSW through supporting employment and economic activity in upstream and downstream industries such as the Professional, Scientific and Technical Services industry and the Financial and Insurance industry. The subject site benefits from close proximity and access to Parramatta Road, however this does not substantially benefit the majority of the existing uses on-site, with new development likely to be more reliant on Arundel Street for vehicular access.
Viability and Connectivity		
5.	Viability and connectivity assessment	The subject site has low to moderate suitability for continued industrial use. Therefore, while the proposed rezoning would enable approximately 25,000 sq.m of non-residential floorspace on-site, broadly consistent with the current provision, this does not represent a like-for-like replacement of existing industrial uses. Retention of employment floorspace does not necessarily equate to the retention of the existing mix of industrial and urban services uses. Rather, the proposed built form is expected to accommodate a different mix of employment uses, predominantly commercial and service-based in nature. Although existing uses may remain permissible under the proposed zoning and controls, their feasibility will be influenced by the design and operational characteristics of the future development.
6.	Adjoining industrial land impact assessment	While there are three industrial precincts within a 1 km radius of the subject site, these precincts are immediately adjacent to and surrounded by existing low, medium and high-density residential uses. As such, there is no risk of operational conflicts or land use interface issues, nor potential for amenity impacts on the proposed residential uses at the subject site.
Public Benefit		
7.	Public benefit assessment	Enabling the development of residential uses at the subject site will deliver a net public benefit as the proposed alternative residential uses would result in the contribution of affordable housing within the City of Sydney.

Source: Urbis

Therefore, while the planning proposal will result in a reduction in the supply of zoned industrial land within the Sydney LGA and a transition away from some existing industrial and urban service functions, the impact should be understood in the context of the subject site's evolving strategic role and the broader transformation of the Parramatta Road corridor. Although a significant quantum of non-residential floorspace will be retained through a requirement for employment-generating uses on the ground and first floors, this is unlikely to represent a like-for-like replacement of existing industrial activities. Rather, future employment outcomes are expected to increasingly comprise commercial, service-based, retail and knowledge-sector uses that are more closely aligned with the surrounding health, education and innovation precinct.

The proposal acknowledges that some existing industrial and urban service businesses may become less feasible within a future mixed-use environment due to building design requirements, servicing constraints, residential interfaces and changes in underlying land values. However, the subject site is no longer part of a cohesive industrial cluster and has limited functional relationships with nearby industrial precincts, many of which are themselves undergoing review, transition or redevelopment. In this context, the planning proposal

is considered to facilitate an appropriate evolution in employment function while delivering substantial housing, place-making and economic benefits, resulting in a more intensive and strategically aligned use of a well-connected inner-city site.

Introduction

This Alternative Use Assessment has been prepared on behalf of the City of Sydney ("The Proponent"). The Proponent is preparing a planning proposal in respect of a site comprising multiple adjoining land parcels along Parramatta Road, Arundel Street and Ross Street, Forest Lodge ("subject site"), in the Sydney local government area ("LGA").

Among other changes, the planning proposal will amend the zoning of the subject site from E3 Productivity Support to MU1 Mixed Use and enable the development of residential uses above non-residential uses (i.e. retail and employment uses). Under the NSW Government's draft *Statewide Policy for Industrial Land* ("draft policy"), this would be considered the introduction of an "alternative use".

Draft Statewide Policy for Industrial Land

The draft policy is a part of a new tranche of key strategic planning documents released by the NSW Government. It sets out how industrial lands will be planned, managed and categorised across the state. The draft policy comes at a time of immediate shortfalls in industrial land which is driving rising costs and low vacancy rates, and prompting some businesses to relocate interstate.

Under the draft policy, the subject site is categorised as Locally Significant industrial land — the most flexible of the policy's three tiers — which is defined as locations with smaller local catchments serving their immediate community and lacking critical mass.

Alternative Use Assessment

As per the draft policy:

> *"An alternative use refers to a development type that is not the primary or intended industrial use for land zoned for industrial purposes under a Local Environmental Plan (LEP) and is generally a prohibited use in the zone. This Policy aims to manage alternative uses to avoid the undue displacement of industrial activities and to maintain the strategic integrity of employment lands, while ensuring alternative uses can be accommodated where appropriate."*[1]

Therefore, in accordance with the draft policy, an Alternative Use Assessment must be undertaken to assist in determining whether the planning proposal should be approved. Alternative Use Assessments are required to address the following considerations:

- Strategic alignment
  - Consideration 1 – Alternative use identification
  - Consideration 2 – Alternative use alignment with zoning objectives
- Economic alignment
  - Consideration 3 – Supply and demand of industrial land
  - Consideration 4 – Economic contribution and proximity
- Viability and connectivity
  - Consideration 5 – Viability and connectivity assessment
  - Consideration 6 – Adjoining industrial land impact assessment

[1] Draft Statewide Policy for Industrial Lands, NSW Department of Planning, Housing and Infrastructure, 2025, p.15

- Public benefit
  - Consideration 7 – Public benefit assessment.

As stated in the draft policy, it is not necessary to satisfy all criteria to be considered for an alternative use. Rather, these criteria serve as a guide for planning authorities when determining if the planning proposal should be approved.

This Alternative Use Assessment addresses the considerations outlined above in accordance with the specific requirements set out in Technical Note 2 ("TN2") of the draft policy and is structured as follows:

- **Introduction:** considers the subject site in its local context and details the alternative land uses being proposed
- **Section 1 – Strategic Alignment:** assesses the alignment of the proposed alternative land uses with relevant City of Sydney and NSW Government strategic planning documents and policies, and determines whether the proposed alternative uses align with the objectives of the current zoning
- **Section 2 – Economic Alignment:** assesses the adequacy of industrial land supply at both a local (i.e. micro) and regional (i.e. macro) level, and determines whether the subject site currently makes a significant economic contribution or enjoys strategic proximity
- **Section 3 – Viability and Connectivity:** assesses the suitability of the subject site for continued industrial use to prevent the premature loss of industrial land, and determines whether the proposed alternative uses at the subject site would significantly impact nearby existing or planned industrial uses
- **Section 4 – Public Benefit:** identifies public benefits that would likely be achieved by the proposed alternative uses at the subject site and determines whether a net material public benefit would likely be achieved
- **Conclusion.**

Subject Site Overview

The subject site comprises multiple adjoining land parcels along Parramatta Road, Arundel Street and Ross Street, Forest Lodge, within the Sydney LGA. The specific land parcels are outlined below in Table I.1.

Table I.1 – Properties Comprising the Subject Site

Address	Lot and DP
64 Parramatta Road, Forest Lodge	▪ Lot 1 DP30884
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The 1.8 ha site is bounded by Arundel Street to the north, Parramatta Road to the south, and is bifurcated by Ross Street. A mixed-use development directly abuts the western boundary of the subject site, while a residential apartment complex is located to the subject site's immediate east. By virtue of its location on a major transport corridor and access to public bus services, the subject site is highly connected to surrounding amenity and services, including the Sydney CBD, multiple universities, the Royal Prince Alfred Hospital, and Broadway shopping centre.

The subject site is currently zoned E3 Productivity Support under the *Sydney Local Environmental Plan 2012* ("Sydney LEP"), which permits a range of employment uses and some ancillary retail and commercial uses

but does not permit any type of residential use. However, as the subject site is identified as a "Business Area" on the Locality and Site Identification Map under the Sydney LEP, Clause 7.13A applies and enables residential flat buildings or mixed-use development where the residential component is provided as affordable housing in accordance with the City of Sydney Affordable Housing Program.

While Clause 7.13A provides a limited pathway for residential development, it was not intended to indicate a broader policy acceptance of housing within the E3 Productivity Support zone. Rather, it functions as a tightly controlled exception linked to affordable housing delivery and subject to careful assessment against the objectives of the zone, including the need to protect the primacy of employment and industrial uses. As such, it does not establish a precedent for wider residential development, which remains fundamentally constrained under the current planning framework.

The portion of the subject site located west of Ross Street has a maximum building height of 15 metres, while part of the portion of the subject site located east of Ross Street has a maximum building height of 12 metres and part has a maximum building height of 15 metres. As with maximum building heights, the maximum floorspace ratio ("FSR") varies across the subject site from 1.5:1 to 1.75:1.

At present, the subject site contains a range of land uses that support a diverse mix of businesses. The table below outlines the on-site tenants as of July 2026, grouped by broad land use category.

Table I.1 – Subject Site Tenants, July 2026

Land Use	Tenants	
Large format retail	▪ Officeworks ▪ Austiques ▪ Luxe Fireplaces	▪ Southern Electrical ▪ C Simpson Restorations
Office premises	▪ NSW Health ▪ Diabetes NSW ▪ Macquarie Law Group	▪ Master Builders Association NSW ▪ Status International Auctions ▪ I.S. Wright Coin Dealer
Education	▪ York Business Institute ▪ Signet Institute	▪ Berkeley Business Institute
Car showroom	▪ Toyota	▪ Carmate Motor Group
Food services	▪ Catering Project	
Emergency services	▪ NSW Ambulance	

Source: City of Sydney Floorspace and Employment Survey 2022; Urbis

Map I.1 – Subject Site



Proposed Alternative Land Uses

The subject site has been identified in the City of Sydney's *Housing for All Discussion Paper* as one of 10 key sites for renewal within the Sydney LGA. The discussion paper notes that the subject site has become isolated and underutilised as the former industrial areas along the northern side of Parramatta Road have been progressively redeveloped over the last 20 years. By virtue of its location adjacent to the University of Sydney and close to the Royal Prince Alfred Hospital, the subject site presents an excellent opportunity to accommodate residential uses including housing for students and workers.

The planning proposal seeks to give effect to this opportunity and facilitate the redevelopment of the subject site into a mixed-use development comprising residential, retail and employment (including commercial) uses. It introduces a site-specific framework to enable intensification of development while supporting the retention of employment functions and enhancing the role of the site within the Parramatta Road corridor.

The objectives and intended outcomes of the planning proposal are to:

- Rezone the subject site from E3 Productivity Support to MU1 Mixed Use to enable a broader mix of residential, retail and employment uses
- Support the delivery of affordable housing to meet the needs of low-and-medium income households within the Sydney LGA
- Facilitate the redevelopment of a strategically located site to deliver new housing, including apartment, build to rent and co-living accommodation, in proximity to the Sydney CBD, University of Sydney and Royal Prince Alfred Hospital
- Support a mix of uses that maintains a quantum of floorspace for employment and service functions, including retail, commercial and institutional uses

- Facilitate an increase in development capacity on the subject site consistent with its location on a major transport corridor
- Enable the transition of the subject site from predominantly low-scale commercial and service uses to a higher-density mixed-use precinct
- Ensure built form responds to surrounding heritage conservation areas and nearby heritage items
- Ensure the building design minimises the flood risk to occupants, workers and visitors
- Deliver high-quality residential amenity, active ground floor uses and sustainable urban design outcomes.

Therefore, the alternative use that forms the basis of this assessment is residential, including co-living accommodation, noting a portion of floorspace at the subject site is proposed for employment uses.

Local Context

The subject site is located on Parramatta Road, directly north of the University of Sydney's Camperdown/Darlington campus. The Royal Prince Alfred Hospital, adjacent to the University, is also situated approximately 300 metres south of the subject site. Low-density residential uses are located to the north, while mixed-use development extends along Parramatta Road to both the east and west. Medium and high-density residential development is also evident along Pyrmont Bridge Road to the west, with the Annandale industrial precinct located further west.

The subject site forms part of a broader Parramatta Road corridor that has experienced substantial land use transition over the past two decades. Historically, Parramatta Road functioned as an important freight and employment corridor characterised by a series of industrial, urban services and commercial land holdings. However, progressive redevelopment has increasingly introduced residential, mixed-use, health, education and institutional land uses, resulting in the fragmentation of the corridor's former industrial character.

This transition is continuing within the immediate locality. Most notably, the former 1.1-hectare WestConnex dive site at Annandale has recently been rezoned from industrial land to MU1 Mixed Use, signalling a further shift towards residential and mixed-use outcomes in the surrounding area. There are also several Housing Delivery Authority Expressions of Interest seeking approval to develop high-density residential uses on employment lands around the WestConnex dive site, which have been recommended to proceed. Other employment lands along the corridor are also subject to strategic review and investigation for higher-density urban renewal outcomes. As a result, the subject site no longer forms part of a cohesive industrial cluster and has limited functional relationships with nearby industrial precincts.

The evolving role of the corridor reflects a broader strategic shift from a traditional industrial and freight-network function towards a series of well-connected urban precincts focused on housing, employment, services and public transport accessibility. While Parramatta Road continues to provide an important transport connection, its strategic role is increasingly linked to supporting urban renewal, housing delivery and access to major employment generators, including the University of Sydney, Royal Prince Alfred Hospital and the broader Camperdown Health and Education Precinct.

In this context, the subject site's future role is increasingly defined by its proximity to these major health, education and innovation assets rather than its historic industrial function. This direction is broadly consistent with the NSW Government's contemporary planning framework, including the Ministerial Statement of Expectations, which encourages councils to plan for and update planning controls applying to locally significant industrial land identified within regional strategic plans. The subject site's classification as Locally Significant Industrial Land recognises that such land may require periodic review to ensure planning controls remain aligned with changing strategic priorities, surrounding land use patterns, infrastructure investment and community needs.

By virtue of its inner-city location, the subject site benefits from close proximity to extensive services and amenities, including:

- **Broadway Shopping Centre** – a regional shopping centre located approximately 700 metres east of the subject site, anchored by Kmart, Target, Coles and Hoyts, providing a broad range of convenience and discretionary retail, entertainment and services.
- **Victoria Park** – a major inner-city open space located approximately 650 metres east of the subject site. The park contains a playground, swimming pool and café and provides approximately 8.9 hectares of publicly accessible recreation space.
- **King Street, Newtown** – a major retail high street located approximately 900 metres south of the subject site, providing a diverse range of food and beverage venues, convenience retail and local services.
- **Tramsheds** – a destination food and beverage precinct located approximately 1 kilometre north-west of the subject site, also containing a Supamart IGA supermarket and a range of convenience retail offerings.

These surrounding services, combined with the subject site's proximity to major employment, education and health institutions, reinforce its suitability for a higher-density mixed-use outcome that responds to the ongoing transition of the Parramatta Road corridor and the broader strategic direction for this part of inner Sydney.

Map I.2 – Local Context



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1 Strategic Alignment

This section assesses the alignment of the proposed alternative land uses with relevant NSW Government and City of Sydney strategic planning documents and policies, and determines whether the proposed alternative uses align with the objectives of the current zoning.

1.1 Alternative Use Identification

In accordance with TN2 Consideration 1, this sub-section undertakes a qualitative assessment to examine the extent to which the proposed alternative land uses for the subject site are consistent with relevant City of Sydney and NSW Government strategic planning documents and policies. The following documents are relevant, and key documents are assessed in Table 1.1.1 and Table 1.1.2:

State and Regional Planning

- Greater Sydney Region Plan
- Eastern City District Plan
- Draft Sydney Plan

Local Strategic Planning

- City Plan 2036: Local Strategic Planning Statement (LSPS)
- Housing for All: City of Sydney local housing strategy
- Economic Development Strategy 2025–2035
- Sustainable Sydney 2030–2050: Continuing the Vision and Community Strategic Plan: Delivering Sustainable Sydney 2030–2050: 2025 Update.

While the City of Sydney does not have a current Employment Lands Strategy in effect, noting the strategic approach and key actions are instead contained in the LSPS, the most recent City of Sydney Enterprise Area Review 2019 provided a strong evidence base for strategic decision making at the time.

Importantly, the review distinguished Parramatta Road, Forest Lodge lands from the broader Southern Enterprise Area, recommending that it be planned in accordance with the Camperdown Innovation Precinct and Biotechnology Hub initiatives due to its strategic relationship with surrounding health, education and innovation uses.

However, the review was prepared within a policy context that strongly prioritised the retention and management of industrial land. Since then, the strategic focus along the Parramatta Road corridor has evolved, with increasing emphasis on housing delivery through initiatives such as the Housing Delivery Authority and the redevelopment of government-owned land. As such, the review's findings should be considered alongside the more recent strategic shift towards accommodating housing growth in this part of the corridor.

1.1.1 State and Regional Planning

The following section summarises the alignment of the proposed rezoning of the subject site with the new suite of NSW Government planning policy reforms and key priorities, including housing and affordable housing delivery, employment and job growth, infrastructure alignment, and vibrancy and culture. Overall, the proposed alternative uses for the subject site (i.e. residential) are broadly consistent across a range of objectives outlined in the State's strategic planning framework and associated policies.

1.1.1.1 Greater Sydney Region Plan: A Metropolis of Three Cities and Eastern City District Plan

The *Greater Sydney Region Plan*: *A Metropolis of Three Cities* was released in 2018 and remains the current strategic regional plan for Sydney until it is replaced by the finalised *Sydney Plan*. The framework responds to

significant population growth by reshaping Greater Sydney into three connected city hubs, with the aim of enabling most residents to access jobs, education and health services within 30 minutes.

The three cities comprise the Eastern Harbour City, anchored by the Sydney CBD; the Central River City, centred on Greater Parramatta; and the Western Parkland City, anchored by Western Sydney (Nancy-Bird Walton) Airport and strategic centres including Penrith.

The framework divides Greater Sydney into five subregions, each guided by a 20-year district plan. The Sydney LGA falls within the Eastern City District, with the *Eastern City District Plan* setting planning priorities and actions to guide growth and implement the broader regional strategy. The district plan sought to increase housing supply and affordability by focusing higher-density residential growth near major transport and employment hubs.

The *Greater Sydney Region Plan*: *A Metropolis of Three Cities* and associated *Eastern City District Plan* established the longstanding "retain and manage" approach to industrial and urban services land. Under this framework, industrial lands were generally to be protected from rezoning and alternative uses in order to maintain employment capacity, support urban services and preserve freight and logistics functions. In this regard, the planning proposal is inconsistent with the historical policy position as it seeks to facilitate the transition of land currently zoned E3 Productivity Support to a mixed-use outcome that includes residential uses.

However, the "retain and manage" framework is now being superseded through the NSW Government's strategic planning reforms, including the draft *Statewide Policy for Industrial Lands* and draft *Sydney Plan*. These reforms adopt a more nuanced approach that differentiates industrial land according to its strategic significance and expressly contemplates consideration of alternative uses on Locally Significant Industrial Land where broader strategic, economic and public benefit outcomes can be demonstrated through an Alternative Use Assessment. As the subject site is identified as Locally Significant Industrial Land, the proposal is more appropriately assessed against this emerging strategic framework rather than the former blanket "retain and manage" approach.

1.1.1.2 Draft Sydney Plan

The draft *Sydney Plan* ("draft Plan") is the first of four regional plans to be publicly exhibited as part of the NSW Government's strategic planning reforms. It is established under the *A New Approach to Strategic Planning*: *Discussion Paper* ("Discussion Paper"), which will be formalised in the future *State Land Use Plan*.

These reforms seek to reduce duplication in the planning system by better aligning housing, jobs and infrastructure planning, providing councils with clearer guidance and making planning policies easier to navigate and implement.

A three-tiered structure of state, regional and local plans will be introduced. These are supported by seven statewide priorities to ensure consistent land use planning, including Aboriginal Outcomes, Housed, Prosperous, Connected, Resilient, Liveable, and Coordinated.

A finalised *Sydney Plan* is expected by mid-2026 when it will replace the current *Greater Sydney Region Plan*: *A Metropolis of Three Cities* and associated *Eastern City District Plan*. With Sydney's population projected to grow by 23% to 6.5 million by 2045, the draft Plan establishes a 20-year land use framework to guide future growth.

It translates the priorities established by the *Discussion Paper* into the Sydney context through 12 responses that support the region's growth and development. Rezoning the subject site gives effect to several of the draft Plan's key responses:

Table 1.1.1 – Alignment of the Planning Proposal with the Draft Sydney Plan

Relevant Policy Direction	Proposed Rezoning
Response 1: Implement Sydney Housing Targets	
The draft Plan mandates five-year housing targets for all Sydney LGAs. The City of Sydney is obligated to deliver 18,900 dwellings by 2029 — one of the highest targets in the region. The draft Plan is explicit that the NSW Government will intervene if councils do not provide for housing capacity in renewed local plans.	The housing targets are important for the short-term whereas the subject site represents a key site with longer-term potential to accommodate well-located housing that leverages existing infrastructure; is connected to community, jobs, recreation and services; and provides excellent amenity
Response 2: Increase Housing Diversity and Choice	
Councils must identify areas that can accommodate more diverse housing based on public transport connections and consider high-density options around transit hubs.	The subject site is directly serviced by existing bus routes along Paramatta Road The planning proposal will increase housing diversity and choice by enabling development of a significant quantum of apartments and co-living accommodation (including affordable housing) at the subject site.
Response 3: Secure the supply of affordable housing	
The draft plan notes that DPHI will expedite local strategic planning for affordable housing, increasing certainty and streamlining affordable housing provisions in the medium to long term.	The planning proposal will ensure that any future residential development on the site will include the provision of affordable housing, helping secure future supply.
Response 4: Grow Well-Located Jobs	
The draft Plan observes that centres are evolving from shopping destinations to mixed-use spaces, and supports rezoning consistent with the residential centre typology.	The planning proposal is consistent with the draft Plan's residential centre typology, directly transitioning a E3 Productivity Support site to an MU1 Mixed Use zone that retains lower-level retail and employment uses while adding residential density above.
Response 5: Align Infrastructure to Planned Growth	
Growth must be sequenced where infrastructure already exists, without requiring new State capital investment.	The subject site is already served by existing roads, bus routes, utilities, open space, and community facilities. The planning proposal unlocks density where infrastructure capacity exists without requiring significant new State capital investment.
Responses 6 & 7: Create a More Vibrant and Connected Sydney	
Councils should reimagine employment and mixed-use zones to support vibrant, higher-density communities, and require infill development to improve access to and provision of public open space.	The planning proposal would enable active lower-level uses and residential density, while also creating opportunities for new retail and employment uses that support the surrounding health and education precinct, enabling students and workers to live closer to where they study and work.

Source: NSW DPHI; Urbis

1.1.2 Local Strategic Planning

The proposed rezoning of the subject site has been assessed against a range of relevant City of Sydney local strategic planning documents, including housing, economic, and sustainability strategies. Table 1.1.2 provides a summary of the planning proposal's alignment with local strategic planning policies and documents (further details are provided in Appendix A).

Overall, the planning proposal for the subject site is broadly consistent with the City's local strategic planning framework through its support of housing supply, mixed-use renewal, access to services, and continued economic activity on a well-located urban site. However, it is partially inconsistent with some objectives to increase or protect employment lands and growth across the city.

Table 1.1.2 – Summary of the Planning Proposal's Alignment with Local Strategic Planning

Plan	Key direction	Relevance to site	Alignment
City Plan 2036 (LSPS)	Supports walkable neighbourhoods, aligned infrastructure delivery, active streets, and diverse housing including co-living (I1, I2, L2, L3). Encourages employment growth and economic productivity across the city (P1).	The planning proposal retains non-residential uses on-site, supporting walkability and street activation. It is a mixed-use proposal scaled to infrastructure capacity, with potential to introduce diverse housing, including co-living accommodation. Over time, some existing employment activity on the site may become less feasible as redevelopment occurs. Notwithstanding this, the proposal is expected to enable the site to continue contributing to economic growth and productivity through ongoing non-residential uses. While the mix of business activity may evolve, the site is anticipated to support a range of services and employment that cater to the needs of nearby residents, businesses, students and visitors.	**Partially Supports**
Housing for All Strategy	Locates new homes near infrastructure, jobs and transport; coordinates growth with existing infrastructure; increases housing diversity; increases affordable	The subject site is identified as one of 10 key areas for redevelopment. It is well-located near education and health facilities, transport and	**Supports**

	housing supply for lower-income and key worker households (H1, H2, H3, H4).	services; with the planning proposal intending to add apartments and affordable housing opportunities while retaining lower-level employment uses.	
Economic Development Strategy	Aims to secure Sydney's economic future by enabling business / employment growth and safeguarding land for strategic industrial activities and essential urban services, alongside supporting housing near transport and a vibrant street-level economy. Seeks to protect economic activities including industrial and urban services.	The proposal supports housing near transport and street vibrancy through retained retail / commercial uses. However, the rezoning of an industrial / employment specific site is inconsistent with the strategy's safeguarding objective.	**Partially Supports** — supports housing / place-making priorities, but is inconsistent with industrial land protection objectives.
Sustainable Sydney 2030–2050: Continuing the Vision and 2025 Update	Supports diverse and affordable housing, active street-level economic life, and well-planned intensification of existing sites (D10, D9, D4).	The proposal enables residential apartments and co-living (including an affordable housing component), retains active retail / employment at street level, and intensifies an existing site.	**Supports**

Source: City of Sydney; Urbis

Key findings

- The proposed alternative uses for the subject site (i.e. residential) are broadly consistent across a range of objectives outlined in the State's strategic planning framework and associated policies, and with the City of Sydney's local strategic planning framework through its support of housing supply, mixed-use renewal, access to services, and continued economic activity on a well-located urban site.
- The proposal partially conflicts with some objectives which intend to retain or protect employment and industrial land as rezoning and added residential capacity may reduce the viability of existing business operations at the subject site.

1.2 Alternative Use Alignment with Zoning Objectives

In accordance with TN2 Consideration 2, this sub-section assesses whether the alternative uses proposed at the subject site align with the objectives of the current zoning.

As noted previously, the subject site is zoned E3 Productivity Support under the Sydney LEP. The zone's objectives are:

- To provide a range of facilities and services, light industries, warehouses and offices
- To provide for land uses that are compatible with, but do not compete with, land uses in surrounding local and commercial centres
- To maintain the economic viability of local and commercial centres by limiting certain retail and commercial activity
- To provide for land uses that meet the needs of the community, businesses and industries but that are not suited to locations in other employment zones
- To provide opportunities for new and emerging light industries
- To enable other land uses that provide facilities and services to meet the day-to-day needs of workers, to sell goods of a large size, weight or quantity or to sell goods manufactured on-site
- To encourage employment opportunities
- To promote land uses with active street frontages
- To provide for land uses that support the viability of adjoining industrial land uses.

Residential development is not supported within E3 Productivity Support zoning as its introduction is generally considered to undermine the zone's core purpose of retaining land for employment uses. Permitting housing in the E3 Productivity Support zone may inflate land values and place pressure on the ongoing viability of surrounding non-residential uses. Over time this could displace core employment uses and erode the zone's primary function. Residential occupants are also incompatible with operations typical of E3 Productivity Support uses such as servicing, loading, extended trading hours, and associated noise - which may give rise to conflicts.

Rather than seeking an exception to permit residential uses within the E3 Productivity Support zone, a planning proposal for rezoning will be pursued for the subject site. This would enable residential and non-residential uses to coexist, with appropriate controls to retain employment floors pace and manage interface impacts through a MU1 Mixed Use, a more appropriate zoning.

Key findings

- Residential development is not supported within the E3 Productivity Support zone as it undermines the zone's core purpose of retaining land for employment uses.
- A planning proposal is required to facilitate the proposed alternative uses through rezoning the subject site to MU1 Mixed Use.

2 Economic Alignment

This section assesses the adequacy of industrial land supply at both a local and regional level and determines whether the subject site currently makes a significant economic contribution or enjoys strategic proximity.

2.1 Supply and Demand of Industrial Land

In accordance with TN2 Consideration 3, this sub-section assesses the adequacy of industrial land supply using data and information from the Sydney LEP and the NSW Department of Planning, Housing and Infrastructure's ("DPHI") Employment Lands Development Monitor ("ELDM"). It also qualitatively assesses demand for industrial uses at the subject site based on key success factors for typical industrial uses.

2.1.1 Industrial Land Supply Analysis

In assessing the supply of industrial land at a regional level, the Sydney LGA is adopted as the relevant study area. To assess the supply of industrial land at a local level, areas located within a 1 km radius of the subject site have been considered.

2.1.1.1 Regional Analysis - Sydney LGA

In total, the Sydney LGA provides 206.8 ha of industrial-zoned land, with 200.9 ha developed and 5.9 ha undeveloped as of January 2025. The majority (78%) of this land is zoned E3 Productivity Support (161.1 ha) while the remainder is zoned E4 General Industrial.

As shown in the map overleaf, the vast majority of the LGA's industrial land is concentrated within the Alexandria-Rosebery industrial precinct. However, there is also a small provision at Moore Park, and at the Sydney Fish Market site.

As of January 2025, only 5.9 hectares of industrial-zoned land within the Sydney LGA is still undeveloped, albeit highly fragmented. Only one parcel of undeveloped land has an area exceeding 1 ha, and it is located within the subject site.

Table 2.1.1 – Industrial Land Supply by Zoning, Sydney LGA, January 2025 (ha)

Zone	Developed	Undeveloped	Total
E3	156.7	4.4	**161.1**
E4	44.2	1.5	**45.7**
TOTAL	**200.9**	**5.9**	**206.8**

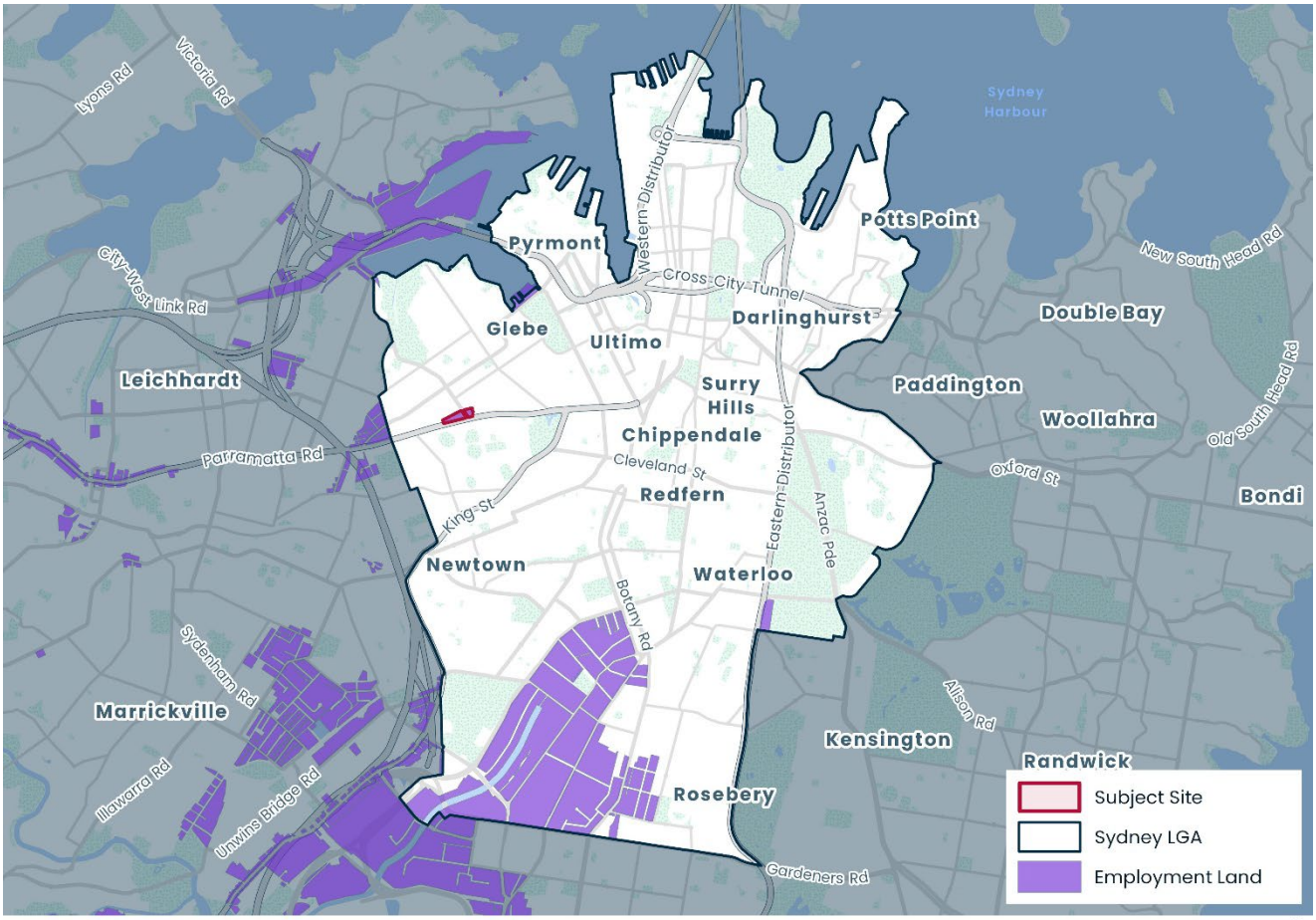
Source: NSW DPHI

Table 2.1.2 – Industrial Land Supply by Lot Size, Sydney LGA, January 2025 (ha)

Lot Size	Undeveloped
<0.1 ha	0.2 ha (2 lots)
0.1 – 0.5 ha	3.0 ha (15 lots)
0.5 – 1 ha	1.2 ha (2 lots)
1 – 5 ha	1.5 ha (1 lot)
TOTAL	**5.9 ha (19 lots)**

Source: NSW DPHI

Map 2.1.1 - Industrial Land, Sydney LGA, 2026



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Impact of Rezoning the Subject Site

While the rezoning would technically result in a 1.1% reduction in the Sydney LGA's total E3 Productivity Support-zoned land and a 0.8% reduction in the LGA's total industrial land supply, the implications extend beyond a simple reduction in zoned land area.

At present, the subject site accommodates a mix of employment-generating uses, including retail, office, education and urban services activities. The planning proposal would require non-residential uses to be retained on the ground and first floors, resulting in the continued provision of a substantial quantum of employment floorspace. However, the retention of employment floorspace may not represent the retention of existing employment functions.

While future redevelopment is likely to accommodate retail, commercial office and other employment-generating uses, it is unlikely to provide a like-for-like replacement of all existing industrial and urban services activities currently operating on the site. Some uses may become less feasible within a predominantly residential mixed-use environment due to building design requirements, servicing constraints, residential interfaces and increased underlying land values. As a result, redevelopment may lead to the displacement of some existing businesses and a transition away from certain industrial and urban services functions.

At the same time, future employment floorspace is expected to support a different mix of activities that are more closely aligned with the subject site's evolving strategic context. In particular, commercial, professional, service-based and knowledge-sector uses are likely to become increasingly prominent, reflecting the site's proximity to the University of Sydney, Royal Prince Alfred Hospital and the broader Camperdown Health and Education Precinct. These uses would continue to generate employment and economic activity while better reflecting the changing character of the Parramatta Road corridor.

Accordingly, while the proposal may result in some loss of industrial function at the subject site, this should be considered in the context of the site's increasing isolation from the broader industrial lands network, the

ongoing transition of surrounding employment lands, and the corridor's shift towards mixed-use, health, education and residential outcomes. In this context, the rezoning is considered unlikely to materially affect the broader industrial land network within the Sydney LGA, with future employment outcomes better aligned to the strategic role of the locality and the wider transformation of the Parramatta Road corridor.

Table 2.1.3 – Impact of Rezoning the Subject Site on Total Industrial Land Supply, Sydney LGA (ha)

	Sydney LGA Including Subject Site	Sydney LGA Excluding Subject Site	*% Reduction*
E3 Productivity Support	161.1	159.4	*1.1%*
Total Industrial Land	206.8	205.1	*0.8%*

Note: The ELDM Supply of Employment Lands includes Employment Land zoned WF4, which has been excluded
Source: City of Sydney; NSW DPHI; Urbis

2.1.1.2 Local Analysis – 1 km Radius from Subject Site

As shown overleaf in Map 2.1.2, there are three industrial precincts located within a 1 km radius of the subject site. These are the Annandale, Camperdown, and Stanmore industrial precincts which are all located within the Inner West LGA.

As of 2025, the majority (79.2% or 9.9 ha) of the industrial land within 1 km radius of the subject site (including the subject site) is zoned E4 General Industrial while the remaining 20.8% (2.6 ha) is zoned E3 Productivity Support. The only undeveloped industrial zoned land in this area is a 0.1-ha parcel zoned E3 Productivity Support which is located within the subject site.

Table 2.1.4 – Industrial Land Supply by Zoning, 1 km Radius from Subject Site (including Subject Site), 2025 (ha)*

Zone	Developed	Undeveloped	Total
E3 Productivity Support	2.5	0.1	**2.6**
E4 General Industrial*	9.9	-	**9.9**
TOTAL	**12.4**	**0.1**	**12.5**

**The former WestConnex dive site at 160-186 Parramatta Road and 79-95 Pyrmont Bridge Road, Annandale was rezoned on 12 December 2025 from E4 General Industrial under the Inner West LEP 2022 to MU1 Mixed Use. Therefore, these have been excluded.*
Source: City of Sydney; NSW DPHI; Urbis

While these precincts are currently zoned as either E3 Productivity Support or E4 General Industrial, and considered as employment land, they are also in the processes of being investigated for redevelopment and rezoning. This includes the former WestConnex dive site in Annandale, which was rezoned to MU1 Mixed Use in December 2025. Additionally, as shown in the table below, a number of other sites in the local area are also currently being investigated for residential development or have received approval for rezoning.

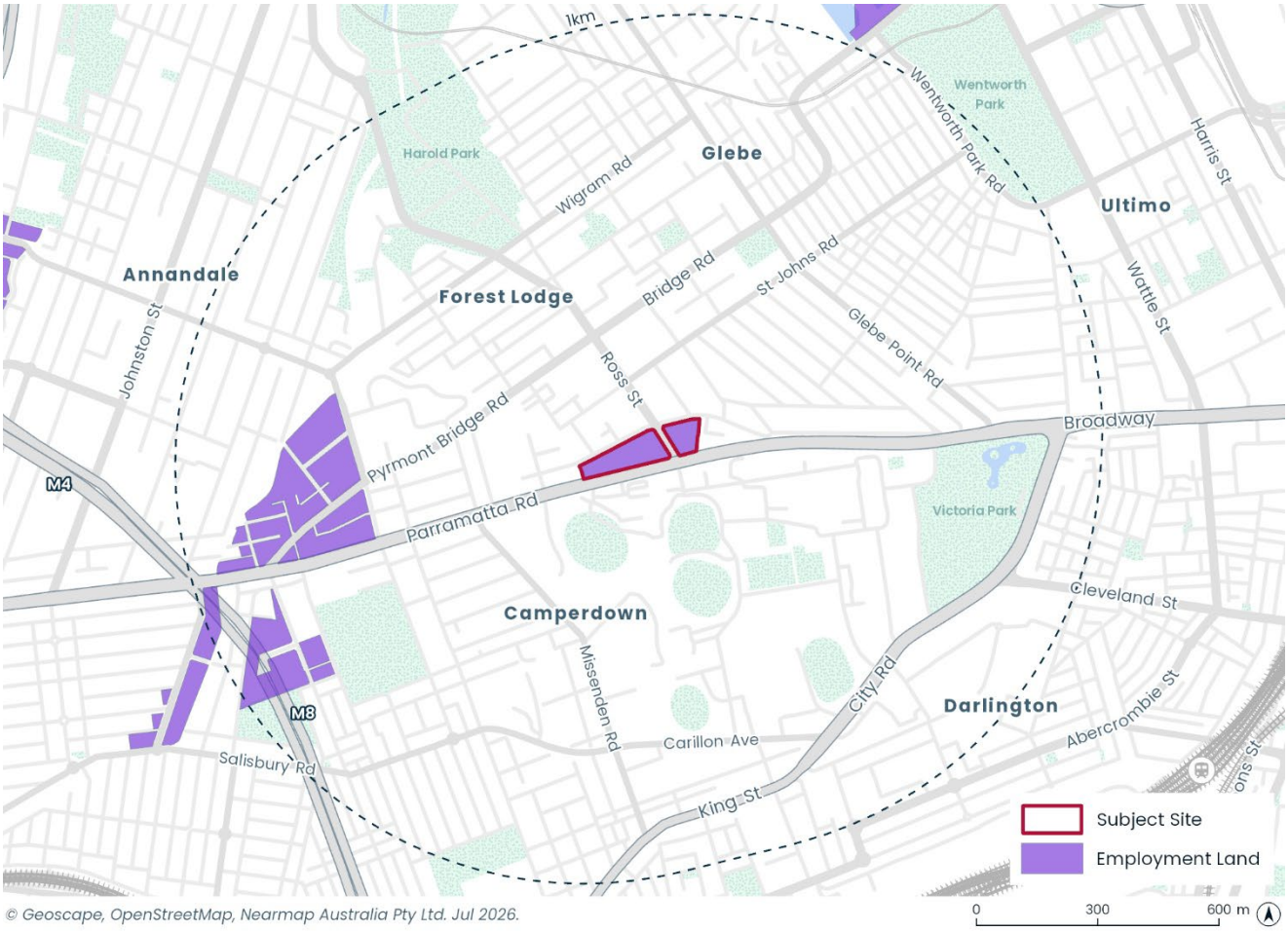
Table 2.1.5 – Proposed/Approved Rezonings of Industrial Land, 1 km Radius from Subject Site

Site	Proposed Uses	Proposed Zoning	Status
52-54 Pyrmont Bridge Road, Annandale	600 residential units. commercial, health	MU1 Mixed Use	Prepare EIS
206 Parramatta Road/130,122-128 Bridge Road, Annandale	281 residential units	MU1 Mixed Use	Under Assessment
WestConnex Dive Site	577 residential units	MU1 Mixed Use	Approved

99-101 Pyrmont Bridge Road, 190-192, 194-196 Parramatta Road	187 residential units, retail, commercial	MU1 Mixed Use	Prepare EIS
63-77 Pyrmont Bridge Road	180 residential units, commercial	MU1 Mixed Use	Prepare EIS

Source: NSW DPHI

Map 2.1.2 - Industrial Land, 1 km Radius from Subject Site, 2026



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Impact of Rezoning the Subject Site

The rezoning of the subject site would technically result in a 69.2% reduction in E3-zoned land supply, a 14.4% reduction in total industrial land supply, and a 100% reduction in undeveloped industrial land supply within a 1 km radius of the subject site (this undeveloped parcel was used for the construction of the NSW Ambulance Station but is now vacant). However, it is critical to recognise that the subject site no longer functions as part of a stable or consolidated industrial cluster. Rather, the surrounding pattern of rezonings and redevelopment outlined above is progressively changing the character and function of the Parramatta Road corridor.

Accordingly, the proposed rezoning of the subject site would not result in the fragmentation or erosion of a viable industrial network, as the broader network is already transitioning away from industrial activities. Retaining the existing industrial zoning in isolation would likely result in the subject site becoming increasingly disconnected from the emerging urban context and less suitable for ongoing industrial operations over time.

Table 2.1.6 – Impact of Rezoning the Subject Site on Total Industrial Land Supply, 1 km Radius from Subject Site (ha)

	1 km Radius Including Subject Site	1 km Radius Excluding Subject Site	*% Reduction*
E3 Productivity Support	2.6	0.8	*69.2%*
Total Industrial Land	12.5	10.7	*14.4%*

Source: NSW DPHI ELDM Supply of Employment Lands

2.1.2 Industrial Land Demand Analysis

The underlying demand for industrial uses at the subject site has been qualitatively assessed based on the subject site's alignment with key success factors and location drivers for typical industrial uses and businesses.

As shown in Table 2.1.7, there is moderate underlying demand for industrial uses at the subject site overall. This reflects the subject site's excellent proximity to potential customers, workers and major arterial roads and motorway networks, and moderate accessibility for heavy vehicles. However, the subject site is not located within an industrial precinct which would provide opportunities for synergies with complementary businesses.

Table 2.1.7 – Subject Site Rating Against Industrial Land Use Success Factors

Success Factor	Rating	Rationale
Location within an industrial precinct	Low	▪ The subject site is not located within an industrial precinct and while there are three industrial precincts located within a 1 km radius of the subject site, these precincts have no relationships or functional connections to the subject site and are also progressively transitioning to mixed-use, commercial and higher-density urban outcomes via rezonings ▪ While this does slightly impede some of the subject site's existing land uses (which include large format retail, emergency services, office premises, car showrooms), it is more restrictive for traditional industrial land uses which generally benefit from co-location with complementary businesses
Proximity to customers and workforce	High	▪ Given its inner-city location surrounded by residential uses and large-scale employment-generating uses (e.g. University of Sydney, Royal Prince Alfred Hospital), the subject site enjoys excellent access to a large pool of potential customers and workers
Proximity to major arterial roads and motorway networks	High	▪ The subject site enjoys a direct frontage to Parramatta Road which is a major arterial road providing access to central and western Sydney and connections to Sydney's motorway network
Accessibility for heavy vehicles	Moderate	▪ Although Parramatta Road is identified as a heavy vehicle route, new development proposals would generally experience difficulty obtaining direct vehicular access from Parramatta Road due to traffic management, safety and road network constraints. Instead, access would be required from Arundel Street. This street is shared with low-density residential land uses, which limits its effectiveness for heavy vehicle movement due to the constrained local street environment and potential amenity impacts on nearby residents
OVERALL	**Moderate**	▪ **The site's existing characteristics, surrounding land uses, emerging development context and access arrangements reduce its suitability for traditional industrial activity, particularly those that rely on co-location with complementary industrial businesses and efficient heavy vehicle access**

Source: Urbis

Key findings

- While there is considered to be moderate underlying demand for industrial uses at the subject site, this demand would likely be better accommodated elsewhere, in areas such as Sydney south where there is a more convenient and concentrated cluster of light industrial and urban services uses. This is in contrast to the subject site, which does not enjoy agglomeration benefits due to its relative fragmentation.
- The subject site, as with the other pockets of employment land along Parramatta Road, is largely no longer fit-for-purpose and does not support the corridor's resident-oriented transformation. Overall, the rezoning will have a limited impact on the broader take-up of industrial land within the local area or wider Sydney LGA.

2.2 Economic Contribution and Proximity

In accordance with TN2 Consideration 4, this sub-section quantitively assesses the current economic function of the subject site through analysis of the following metrics:

- Economic Contribution
  - Contribution to local and regional employment
  - Role in supply chains
- Proximity to key infrastructure.

2.2.1 Economic Contribution

2.2.1.1 Contribution to Local and Regional Employment

In assessing the subject site's contribution to local and regional employment, both the employment directly generated on-site and the employment generated indirectly through supply chains has been analysed (refer Appendix B for further details).

Based on data sourced from the *City of Sydney Floor Space and Employment Survey 2022* and supplemented with an in-person audit, it is estimated there are currently 573 jobs at the subject site. As shown in Table 2.2.1, two industries account for over 70% of these jobs – Professional, Scientific and Technical Services (212 jobs, 37%), and Retail Trade (148 jobs, 26%). The remaining 155 jobs (27%) are spread across five other industries, none of which are traditional industrial industries and therefore are able to be accommodated within an alternative zoning. This includes education providers and other occupants occupying commercial office space such as York Business Institute, Berkeley Business Institute, Diabetes NSW, Master Builders Association NSW, in addition to food services providers such as Catering Project.

Despite this, it is acknowledged that it is not feasible for all tenants currently at the site to be retained within a mixed-use precinct that hosts predominantly residential land uses. This is not necessarily a negative, as the subject site's relative isolation from other industrial areas would suggest that there may be better locations for industrial and urban uses to be consolidated, where agglomeration benefits amongst businesses may be better realised. At the same time, the existence of office-based employment at the subject site is not necessarily critical under the current zoning, with those employed in the Professional, Scientific and Technical, Finance and Insurance Services, and Education and Training industries potentially able to retain their on-site location under an alternative zoning or in other office locations across the Sydney LGA.

Table 2.2.1 – Direct Employment by Industry, Subject Site, 2026

Industry	Number of Jobs	Proportion of Total
Professional, Scientific and Technical Services	212	37%
Retail Trade	206	36%
Education and Training	81	14%
Health Care and Social Assistance	36	6%
Financial and Insurance Services	22	4%
Accommodation and Food Services	11	2%
Arts and Recreation Services	5	1%
TOTAL	**573**	**100%**

Source: City of Sydney Floorspace and Employment Survey 2022; Urbis

In addition to direct on-site employment, the subject site also indirectly generates employment locally and across NSW through supply chains. Based on the estimated number of direct jobs by industry, the indirect employment generated by the subject site has been estimated using the REMPLAN Input-Output model.

As shown in Table 2.2.2, it is estimated the existing uses at the subject site support 207 jobs across NSW. Of the 207 supply chain jobs, 149 jobs (72%) are within the Sydney LGA, a further 47 jobs (23%) are based elsewhere in Greater Sydney, and the remaining 11 jobs (5%) are located outside of Greater Sydney.

Table 2.2.2 – Indirect Employment, Subject Site, 2026

	Number of Jobs	Proportion of Total
Sydney LGA	149	72%
Rest of Greater Sydney	47	23%
Rest of New South Wales	11	5%
TOTAL NEW SOUTH WALES	**207**	**100%**

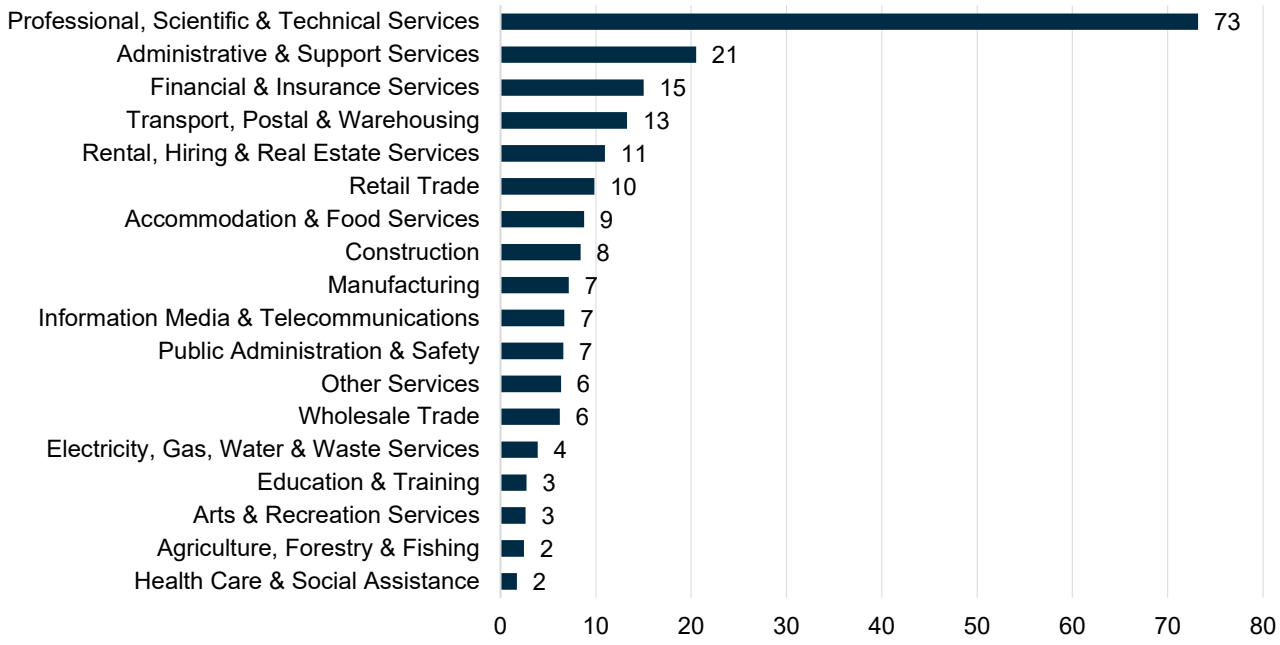
Note: Supply-Chain Effect Only
Source: City of Sydney Floorspace and Employment Survey 2022; REMPLAN; Urbis

2.2.1.2 Role in Supply Chains

The subject site's role in supply chains has been assessed by analysing its indirect employment and gross value added (i.e. economic activity) generation by industry.

As shown in Chart 2.2.1, of the 207 supply chain jobs supported by the array of activities and direct employment at the subject site, over 50% are concentrated within three industries. These comprise the Professional, Scientific and Technical Services industry (73 jobs, 35%), followed by the Administrative and Support Services industry (21 jobs, 10%), and the Financial and Insurance Services industry (15 jobs, 7%).

Chart 2.2.1 – Supply Chain Employment by Industry, NSW, 2026 (No. of Jobs)



Source: City of Sydney Floorspace and Employment Survey 2022; REMPLAN; Urbis

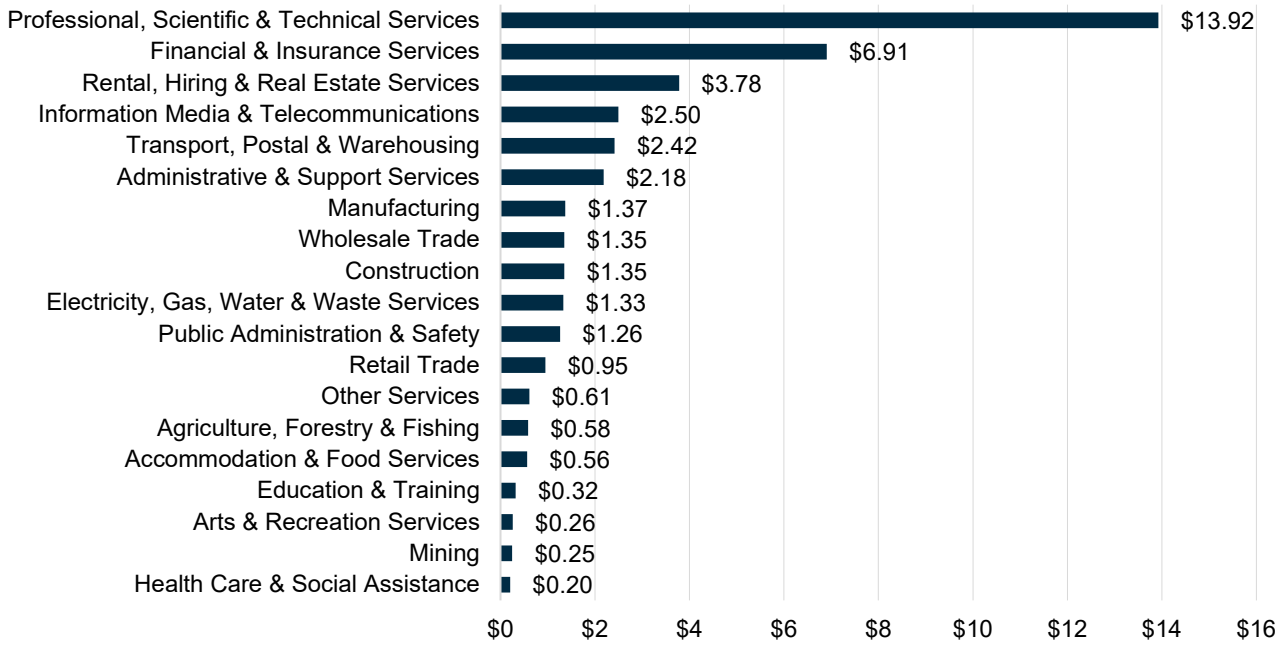
As not all industries are equally productive, the subject site's indirect contribution to gross value added through its supply chains does not mirror its indirect contribution to employment at an industry level.

Chart 2.2.2 shows that 58% of the gross value added indirectly generated by the subject site through its supply chains is concentrated in just three industries, and only two of these industries reflect the top three

industries in terms of supply chain employment. The activities at the subject site indirectly provide the greatest contribution to the Professional, Scientific and Technical Services industry at $13.92 million per annum (33%), followed by the Financial and Insurance Services Industry at $6.91 million per annum (16%). A further $3.78 million per annum is contributed to the Rental, Hiring and Real Estate Services industry (9%).

This analysis demonstrates that the current uses at the subject site are playing an important role in supply chains across NSW. However, as outlined previously, it is likely that any potential future development would support a different mix of land uses and therefore play a different role in supply chains.

Chart 2.2.2 – Supply Chain Gross Value Added by Industry, NSW, 2026 ($M per annum)



Source: City of Sydney Floorspace and Employment Survey 2022; REMPLAN; Urbis

2.2.2 Proximity to Key Infrastructure

As shown in Map 2.2.1, and noted previously, the subject site benefits from close proximity and access to key infrastructure which support its role as industrial land. Most notably, the subject site enjoys a frontage and direct access to Parramatta Road which provides access to central and western Sydney and connections beyond Greater Sydney. However, this connectivity does not substantially benefit the majority of the existing uses on-site, with the exception of emergency services. It is also noted that vehicular access is not guaranteed for new development, with most access expected to be via Arundel Street.

Map 2.2.1 – Key Infrastructure Surrounding Subject Site



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Key findings

- The existing uses at the subject site make a significant economic contribution by:
  - Directly supporting 573 on-site jobs and indirectly supporting 207 jobs across the Sydney LGA, rest of Greater Sydney and rest of NSW
  - Playing an important role in supply chains across NSW through supporting employment and economic activity in upstream and downstream industries such as the Professional, Scientific and Technical Services industry and the Financial and Insurance industry.
- The subject site benefits from close proximity and access to Parramatta Road, however this does not substantially benefit the majority of the existing uses on-site, with new development likely to be more reliant on Arundel Street for vehicular access.

3 Viability and Connectivity

This section assesses the suitability of the subject site for continued industrial use to prevent the premature loss of industrial land, and determines whether the proposed alternative uses at the subject site would significantly impact nearby existing or planned industrial uses.

3.1 Viability and Connectivity Assessment

In accordance with TN2 Consideration 5, the suitability of the subject site for continued industrial use has been qualitatively assessed through consideration of:

- Lot size and fragmentation
- Access to freight routes
- Adjacency to other industrial lands.

As noted by the draft policy, a site that is isolated, constrained or unviable for future industrial development may be suitable for transition.

As shown in Table 3.1.1, the subject site is considered to have moderate suitability for continued industrial use. Although its fragmentation poses issues for larger scale industrial uses that would require lot consolidation, the individual properties are generally of sufficient scale to accommodate many typical light industrial uses. The subject site also currently enjoys access to freight routes; however, this may change in the medium-long term as Parramatta Road shifts to a multi-modal transport corridor which would further limit its potential to accommodate heavy vehicles. Finally, despite being located within 1 km of three industrial precincts, these precincts are investigating or undergoing rezoning themselves, and the subject site is relatively isolated with no relationships or functional connections to them.

The changing role and function of the Parramatta Road corridor, which is coinciding with broader urban renewal across inner-Sydney, is re-shaping the potential for the subject site and other nearby currently zoned industrial lands. As mentioned previously, these precincts are currently in the process of investigations, rezoning proposals and strategic reviews, with the potential to be realised as mixed-use precincts anchored by residential land uses. These broader changes further dilute the subject site's role within Sydney's employment lands network.

However, it must be recognised that the planning proposal will not guarantee the loss of this moderately suitable site from an employment perspective. As noted previously, the planning proposal will require non-residential uses on the ground and first floors, with future redevelopment likely to accommodate retail, commercial office and other employment-generating uses. While many existing uses will remain technically permissible, some industrial and urban service uses may not remain economically or operationally viable within a future mixed-use development.

Table 3.1.1 – Subject Site Rating Against Industrial Land Use Suitability Criteria

Suitability Criteria	Rating	Rationale
Lot size and fragmentation	Moderate	▪ The subject site is highly fragmented, comprising 14 properties in separate ownership, spread across 24 allotments and ranging in size from 119 sq.m to 3,375 sq.m. While the fragmentation poses issues for larger scale industrial uses that would require lot consolidation, the individual properties are generally of sufficient scale to accommodate many typical light industrial uses

Access to freight routes or transport nodes	Moderate	▪ While the subject site enjoys direct frontage to Parramatta Road which is approved for heavy vehicle access and provides access to central and western Sydney, links to Sydney's motorway network (e.g. M4 and M8), and connections beyond Greater Sydney, new development proposals would generally experience difficulty obtaining direct vehicular access from Parramatta Road due to traffic management, safety and road network constraints ▪ Additionally, the NSW Government has a vision for Parramatta Road to shift to a multi-modal transport corridor (potentially including light rail) which would further restrict the already limited freight route's usage
Adjacency to other industrial lands	Low	▪ While there are three industrial precincts located within a 1 km radius of the subject site, these precincts have no relationships or functional connections to the subject site. These sites are also undergoing rezoning investigations, which would further reduce any adjacency to other industrial lands. As such, the subject site is relatively and increasingly isolated.
OVERALL	**Low-Moderate**	▪ **The subject site has both positive and negative attributes in respect of lot size and fragmentation, and access to freight routes. However, there is a high likelihood that the subject site would face further isolation within the Sydney industrial land network, as nearby precincts also respond to the urban renewal of Parramatta Road corridor**

Source: Pricefinder; Nearmap; Urbis

Key findings

- The subject site has low to moderate suitability for continued industrial use. Therefore, while the proposed rezoning would enable approximately 25,000 sq.m of non-residential floorspace on-site, broadly consistent with the current provision, this does not represent a like-for-like replacement of existing industrial uses. Retention of employment floorspace does not necessarily equate to the retention of the existing mix of industrial and urban services uses.
- Rather, the proposed built form is expected to accommodate a different mix of employment uses, predominantly commercial and service-based in nature. Although existing uses may remain permissible under the proposed zoning and controls, their feasibility will be influenced by the design and operational characteristics of the future development.

3.2 Adjoining Industrial Land Impact Assessment

The degree of potential land use conflicts between the proposed alternative land use (i.e. residential) at the subject site and nearby existing or planned industrial uses has been assessed in accordance with TN2 Consideration 6.

While there are three industrial precincts within a 1 km radius of the subject site, these precincts are immediately adjacent to and surrounded by existing low, medium and high-density residential uses. Therefore, the introduction of residential uses at the subject site presents no risk of operational conflicts or land use interface issues with these nearby industrial areas.

For the same reasons, there is also no potential for amenity impacts on the subject site arising from industrial operations, such as noise, odour or heavy vehicle movements. Similarly, the proposed residential uses will not encroach upon freight corridors, operational buffers or other infrastructure associated with industrial precincts.

Additionally, the proposed rezoning to MU1 Mixed Use is consistent with the surrounding land use context, which is characterised by a mix of residential, educational and mixed-use zones. This pattern reflects an established urban environment that has transitioned away from industrial activity toward residential and mixed-use development. MU1 Mixed Use zoning occurs to the west of the subject site along Parramatta Road and to the south-west, while a small pocket of E1 Local Centre zoning is located at the intersection of St Johns Road and Ross Street. A large, consolidated area of R1 General Residential-zoned land is located to the north of the subject site, with SP2 Educational Establishment zoning associated with the University of Sydney to the south.

Therefore, the proposed rezoning is not expected to compromise the function or viability of industrial land, nor generate land use conflicts, and is considered appropriate within the existing and evolving urban context.

Key findings

- While there are three industrial precincts within a 1 km radius of the subject site, these precincts are immediately adjacent to and surrounded by existing low, medium and high-density residential uses. As such, there is no risk of operational conflicts or land use interface issues, nor potential for amenity impacts on the proposed residential uses at the subject site.

4 Public Benefit

This section identifies public benefits that would likely be achieved by the proposed alternative uses at the subject site (beyond what would otherwise be achieved through standard contributions) and determines whether a net material public benefit would likely be achieved.

The proposal will be subject to the City of Sydney's affordable housing contribution framework under the Sydney Local Environmental Plan 2012, including Clauses 7.13 and 7.13B, and the City of Sydney Affordable Housing Program. These provisions require development to contribute to affordable housing through either monetary contributions or dedication as a condition of consent. Contributions are directed to community housing providers to support the delivery and ongoing management of affordable rental housing for very low to moderate income households.

Key findings

- Enabling the development of residential uses at the subject site will deliver a net public benefit as the proposed alternative residential uses would result in the contribution of affordable housing within the Sydney LGA.

Conclusion

Industrial lands are critical to the functioning of the Sydney LGA and the wider Greater Sydney region, providing trade, employment and services for communities, and generating significant economic activity. Therefore, any proposed rezoning of industrial lands needs to be carefully considered in accordance with the requirements of the draft policy.

In assessing the suitability of the subject site for rezoning to enable the development of residential uses above ground and first floor non-residential uses (e.g. retail, commercial and other employment uses), the following has been found:

- The proposed alternative uses for the subject site (i.e. residential) are broadly consistent across a range of objectives outlined in the State's strategic planning framework and associated policies, and with the City of Sydney's local strategic planning framework through its support of housing supply, mixed-use renewal, access to services, and continued economic activity on a well-located urban site.
- A planning proposal is required to facilitate the proposed alternative uses through rezoning the subject site to MU1 Mixed Use.
- The existing uses at the subject site, which will remain permissible under the new zoning and controls implemented by the planning proposal, make a significant economic contribution by:
  - Directly supporting 573 on-site jobs and indirectly supporting 207 jobs across the Sydney LGA, rest of Greater Sydney and rest of NSW
  - Playing an important role in supply chains across NSW through supporting employment and economic activity in upstream and downstream industries such as the Professional, Scientific and Technical Services industry and the Financial and Insurance industry.
- The subject site has close proximity and access to Parramatta Road, however this does not substantially benefit the majority of the existing uses on-site, nor is it likely to materially benefit any future uses.
- The subject site has low to moderate suitability for continued industrial use and there is moderate underlying demand for industrial uses at the subject site. While this demand can still technically be accommodated under the proposed new zoning and controls as all on-site uses will remain permissible, it is acknowledged that there will potentially be a loss or displacement of some of these existing users of the site due to site constraints and rental increases associated with a higher zoning and higher-grade development.
- The introduction of residential uses above non-residential uses at the subject site is not expected to result in operational conflicts or land use interface issues, nor potential for amenity impacts on the proposed residential uses at the subject site as the industrial precincts in the surrounding area are already located immediately adjacent to and surrounded by existing low, medium and high-density residential uses.
- There are other sites and precincts along and near Parramatta Road that are concurrently being assessed or investigated for a rezoning from E3 Productivity Support or E4 General Industrial. The rezoning of the subject site will have a limited impact on the broader take-up of industrial land within the local area or wider Sydney LGA due to the existing lack of interconnection and shifting role and function of the other sites in the short-medium term.
- Enabling the development of residential uses at the subject site will deliver a net public benefit through the contribution to affordable housing.

While the planning proposal would technically reduce the overall supply of industrial land within the Sydney LGA, the existing zoning no longer reflects the evolving role and function of the Parramatta Road corridor as a population-serving precinct. This broader transition is also evident in planning proposals for nearby industrial sites, many of which seek rezoning to MU1 Mixed Use.

Although the proposal may result in the displacement of some existing industrial and urban services occupants of the subject site due to building design requirements, servicing constraints, residential interfaces and increased underlying land values, these businesses may have opportunities to relocate to more suitable industrial locations that are still accessible to their existing markets where necessary.

At the same time, the planning proposal would facilitate the delivery of non-residential floorspace capable of accommodating businesses and occupants that are better aligned with the site's strategic location and the emerging character of the Parramatta Road corridor, including some existing businesses and occupants already occupying commercial office space at the site. Given the site's proximity to the University of Sydney, Royal Prince Alfred Hospital and the broader Camperdown Health and Education Precinct, commercial, professional, service-based and knowledge-sector uses are likely to become increasingly prominent on-site and would continue to generate employment and economic activity.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendices

A Local Strategic Planning Alignment

A.1.1 City Plan 2036: Local Strategic Planning Statement (LSPS)

The *City Plan 2036*: *Local Strategic Planning Statement* (LSPS) is a legislatively mandated local strategic plan required under the *Environmental Planning and Assessment Act 1979* (EP&A Act). It sets out a 20-year planning framework for the Sydney LGA, guiding the vision, priorities and actions regarding land use, development, and infrastructure through to 2036. The LSPS establishes 13 planning priorities grouped into the themes of infrastructure, liveability, productivity, sustainability, and governance and implementation.

The proposed rezoning of the subject site is broadly consistent with the City Plan 2036, particularly around housing diversity, mixed-use activation and design excellence goals. It is noted that under the NSW strategic planning framework reforms, the City of Sydney will be required to update its existing LSPS to better align with new state, regional, and local goals; accordingly, the alignments identified here are subject to change.

Table A.1 – Alignment with City Plan 2036: Local Strategic Planning Statement

LSPS Priority	Strategic Direction	Relevance to the Planning Proposal	Alignment
L3 – New Homes for a Diverse Community)	Facilitate additional housing supply, housing diversity and affordable housing to meet the needs of current and future residents.	The planning proposal would enable a significant amount of new housing on a strategically located site close to jobs, education, health services and public transport. The subject site has also been identified by the Proponent as a potential housing growth opportunity through the Housing for All Discussion Paper.	**Supports**
I2 – Align Development and Growth with Supporting Infrastructure	Direct growth to locations that can be efficiently serviced by existing or planned infrastructure.	The subject site is located within an established urban area serviced by existing transport, utility, open space, community and social infrastructure. The proposal would increase the utilisation of existing infrastructure rather than requiring significant new infrastructure investment.	**Supports**
P1 – Growing a Stronger and More Competitive Economy	Support employment growth and economic productivity across the city.	The proposal would retain employment floorspace and facilitate additional commercial and service-based employment opportunities associated with nearby strategic assets including the University of Sydney and Royal Prince Alfred Hospital. However, some	**Partially Supports**

		existing industrial and urban service activities may become less feasible over time due to redevelopment and land value changes.	
L2 – Creating Great Places	Deliver attractive, vibrant and mixed-use places that support community life and local services.	The proposal would facilitate redevelopment of a prominent Parramatta Road site with active lower-level non-residential uses and residential uses above, contributing to the ongoing transformation of the corridor into a more mixed-use urban environment.	**Supports**

The planning proposal is not uniformly aligned with the LSPS. It strongly supports priorities relating to housing delivery, place-making and infrastructure-supported growth but conflicts with Priority P1, which seeks to expand employment and economic growth across the city. This conflict is a consequence of the proposal's transition of land currently zoned E3 Productivity Support to a mixed-use outcome as residential capacity at the subject site may constrain the growth of existing or new business uses.

Notwithstanding this conflict, the subject site has been identified for investigation as a housing growth opportunity by the City of Sydney and is classified by the NSW Government as Locally Significant industrial land under the draft *Statewide Policy for Industrial Lands*. Unlike State Significant or Regionally Significant industrial land, this classification specifically contemplates consideration of alternative uses through a TN2 assessment where broader strategic outcomes can be demonstrated.

Accordingly, the proposal is considered to present a strategic trade-off rather than a clear case of either alignment or conflict with the LSPS. The principal strategic question is whether the housing, infrastructure and urban renewal benefits outweigh the loss of industrially zoned land and some industrial functionality at the subject site.

A.1.2 Housing For All: City of Sydney Local Housing Strategy

The *Housing for All: City of Sydney Local Housing Strategy* sets the City's 20-year plan for housing delivery to 2036. It seeks to facilitate new homes in the right locations close to infrastructure, jobs and public transport, balance housing growth with the City's economic role, and increase housing diversity, affordability and design quality across all tenures. Seven local housing priorities are identified.

Table A.2 – Housing for All: City of Sydney Local Housing Strategy

Relevant Policy Direction	Planning Proposal
Facilitating more homes in the right locations (H1)	
The Strategy seeks to locate new homes close to infrastructure, jobs, services and reliable public transport, while balancing housing growth with employment, sustainable economic growth and the creation of great places.	The planning proposal will enable new housing in an established inner-city location on Parramatta Road, close to the University of Sydney, Royal Prince Alfred Hospital, Broadway Shopping Centre, and frequent bus services. The planning proposal will retain retail and employment uses on the lower levels, balancing housing delivery with ongoing economic activity.
Coordinating housing growth with infrastructure (H2)	
The Strategy emphasises that housing growth should be supported by transport, walking and cycling connections, open space, community facilities, services and social infrastructure.	The subject site is already served by existing roads, utilities, public transport and nearby retail, education and health infrastructure.

Increasing diversity and choice in housing (H3)	
The Strategy supports a mix of dwelling types, tenures and sizes to meet diverse household needs, noting that most future housing growth in the LGA will be delivered as apartments in medium- to high-density development.	The planning proposal will enable the development of residential apartments and co-living accommodation on-site. This will support housing diversity for students, workers, and smaller households seeking to live close to education, health, jobs and services.
Increasing the diversity and number of homes available for lower-income households (H4)	
The Strategy identifies affordable rental housing as critical social and economic infrastructure and supports using the planning framework to increase affordable housing supply, particularly for lower-income and key worker households.	The planning proposal would create an opportunity to deliver affordable housing in an accessible location close to retail, services and employment opportunities.

A.1.3 Economic Development Strategy 2025-2035

The *Economic Development Strategy 2025–2035* aims to secure Sydney's economic future by enabling new business and industry opportunities, supporting employment across a diverse range of sectors, and safeguarding land for strategic industrial activities and essential urban services. The proposal broadly aligns with the strategy across several of its key outcome areas.

Table A.3 – Alignment with Economic Development Strategy 2025–2035

Relevant Policy Direction	Planning Proposal
Housing and Economic Sustainability	
The Strategy recognises that housing unaffordability is costing Sydney's economy and supports concentrating density near established transport infrastructure.	The planning proposal enables the development of high-density residential uses directly fronting a major transport route frequented by bus services.
Experiential Economy and Vibrant Streets	
The Strategy supports vibrant streets and a 24-hour economy through the retention and expansion of active commercial uses at street level.	The planning proposal will contribute to vibrant streets by retaining retail and employment (including commercial) uses on the lower levels.

A.1.4 Sustainable Sydney 2030–2050: Continuing the Vision and Community Strategic Plan: Delivering Sustainable Sydney 2030–2050: 2025 Update

Sustainable Sydney 2030–2050: *Continuing the Vision* extends the original *Sustainable Sydney 2030* vision through to 2050, building on achievements in emissions reduction, urban greening, public domain improvements, and support for cultural life. The plan includes ten strategic directions focusing on environmental sustainability, economic growth, social equity, and cultural enrichment.

Table A.4 – Alignment with Sustainable Sydney 2030–2050: Continuing the Vision

Relevant Policy Direction	Planning Proposal
Direction 10: Housing for All	
The plan targets at least 156,000 private dwellings by 2036, supporting diverse and affordable housing supply.	The planning proposal directly supports this direction through the permitting a mix of residential apartment and co-living accommodation uses, including affordable housing, on-site.
Direction 9: A Transformed and Innovative Economy	
The direction calls for new business models that diversify the economy and sustain active street-level economic life.	The planning proposal retains active lower-level retail and employment uses below residential uses, thereby sustaining street-level activation

The *Community Strategic Plan*: *Delivering Sustainable Sydney 2030–2050*: *2025 Update* identifies the Sydney LGA community's main priorities and aspirations and includes strategies to achieve these over the next 30 years. Ten strategic directions are outlined.

Table A.5 – Alignment with Community Strategic Plan: Delivering Sustainable Sydney 2030–2050: 2025 Update

Relevant Policy Direction	Planning Proposal
Direction 4: Design Excellence and Sustainable Development	
The plan supports well-planned and designed development that reduces environmental impacts through intensification of existing sites.	The proposal delivers well-planned development through intensification of an existing site.
Direction 10: Housing for All	
The plan sets a target of 173,500 dwellings by 2036 and explicitly calls for diverse housing types including co-living, student accommodation and affordable rental options.	The planning proposal directly addresses this direction through enabling the development of co-living accommodation and residential apartments on-site, contributing to the dwelling target and expanding the diversity of housing types available within the LGA.

B Input-Output Analysis

In this assessment, REMPLAN software has been used to model and quantify the economic contribution associated with the existing uses at the subject site. REMPLAN is an Input-Output model that captures inter-industry relationships within an economy. It can assess the area-specific direct and flow-on implications across industry sectors in terms of employment, wages and salaries, output and gross value added (Gross State Product).

The current economic contribution of the subject site has been quantified in terms of direct and indirect employment generation, and indirect gross value added generation.

Key points regarding the workings and terminology of the model are as follows:

- REMPLAN uses either the value of investment or employment as the primary input. For this analysis, the current on-site employment at the subject site was the input
- Outputs from the model include direct and indirect employment and gross value added (i.e. economic activity) generated by the existing uses on-site
- Employment generated includes all full-time, part-time and casual jobs generated
- Both the direct and indirect contributions were modelled for employment and gross value added
  - Direct refers to the effect felt within the industry where the activity is occurring. For example, for a shopping centre, the majority of the direct effects are felt in the Retail Trade industry
  - Indirect effects are (1) those felt within industries that supply goods to the industries directly affected (supply chain effects) and (2) to industries that benefit from the wages that are earned and spent by those employed within the industries directly affected (consumption-induced effects). For the purposes of this analysis, consumption-induced effects have been excluded. Consumption-induced effects are prone to overstate the benefits of a particular investment as they overestimate the impact of wage and salary increases in the local economy. This is accepted industry practice.

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