



TfNSW Reference: SYD20/0049/01
Council Reference: SF20/881

The General Manager
Gail Connolly
Georges River Council
PO Box 205
Hurstville BC NSW 1481

Attention: Stephanie Lum

Dear Ms Connolly,

REVIEW OF (STAGE 1) DRAFT GEORGES RIVER LOCAL ENVIRONMENT PLAN (LEP) 2020

Transport for NSW (TfNSW) advises that legislation to bring Roads and Maritime Services and TfNSW together as one organisation came into effect on 1 December 2019 so we can deliver more integrated transport services across modes, and better outcomes to customers and communities across NSW.

This letter represents the views of the new TfNSW organisation.

To implement the *Georges River Local Strategic Planning Statement*, along with other strategies such as the Draft Local Housing Strategy, the Commercial Centres Strategy and Industrial Land review, Council is proposing a staged response to its LEP amendments, with Stage 1 currently under review. We understand the full staged approach in relation to preparing the Georges River LEP to be as follows:

- Stage 1 – Housing and Harmonisation (not inclusive of the HLEP2012)
- Stage 2 – Housing Choice (scheduled for 2021)
- Stage 3 – Jobs and Activation (scheduled for 2022)
- Stage 4 – Housing and Future Growth (scheduled for 2025 and beyond)

TfNSW notes that the Draft LEP 2020 Planning Proposal (Stage 1) primarily actions the harmonisation of the main existing LEPs applicable to the former council areas of Kogarah (*Kogarah Local Environmental Plan 2012*) and Hurstville (*Hurstville Local Environmental Plan 2012*) to provide a consistent planning approach across the LGA. We understand that the remaining Deferred Land known as the Hurstville Civic Precinct and the Westfield site will not be incorporated into the GRLEP 2020 at this stage and will remain under the *Hurstville Local Environmental Plan 1994*.

This Stage 1 planning proposal also seeks to achieve shorter term housing targets through rezoning certain areas, and proposes non-residential floor area provisions for mixed use development in certain business areas to better protect this land for warehousing and other business uses. The introduction of a minimum lot size requirement for IN2 industrial is proposed, as well as a building height increase in Kingsgrove and parts of Peakhurst to 16m to provide more diversity of product.

TfNSW has reviewed the Draft LEP 2020 (Stage 1) Planning Proposal documents and has collated comments from across the Transport cluster, which are provided at Attachment A for Council's

consideration. TfNSW would be happy to facilitate a meeting to discuss the comments with Council, as well as early discussion on future stages.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, Amanda Broderick would be pleased to take your call on phone 8849 2391 or email: development.sydney@transport.nsw.gov.au

Yours sincerely

A handwritten signature in blue ink that reads "Cheramie Marsden". The signature is fluid and cursive, with the first name being more prominent.

Cheramie Marsden
Senior Manager Strategic Land Use
Land Use, Networks & Development, Greater Sydney

Attachment A: Detailed Comments

Property and Transport Reservations

All existing TfNSW corridors and reservations need to be maintained and appropriately reflected in the Land Zoning and Land Reservation Acquisition maps as SP2 Infrastructure. TfNSW will provide shapefiles of its reservations under separate correspondence to assist Council in reflecting these requirements. No new reservations or SP2 zones relating to TfNSW are to be added without prior written approval.

Transport Infrastructure

TfNSW supports Council undertaking appropriate studies to support further stages of the LEP review, noting this is when more substantial housing and employment uplift is proposed to occur.

It is important that commercial centres strategy carefully considers local freight access to centres. Efficient movement of freight requires a strategy that integrates it with the efficient movement of people, especially in and around the city centre whilst protecting urban amenity and freight access. Local distribution centres for example, might be beneficial in the B4 zone, providing Council the flexibility to promote and approve local freight hubs in key urban centres where freight demand is high, kerb and road space is constrained and freight movements have the potential to impact amenity and place-making objectives. Local freight hubs can support freight consolidation and the use of sustainable alternative modes, such as walking and cycling, for last mile delivery (such as online shopping or parcel freight) as well as support place outcomes.

Freight rail forms an essential and invaluable component of NSW's freight and logistics network and in turn for the NSW economy. The Illawarra rail line is an important rail freight corridor in Georges River LGA. In considering amendments to the LEP, Council needs to consider and plan for the continuation of freight rail operations, noting they:

- have a unique noise profile, when compared to passenger rail and road noise;
- have other off-site impacts, including vibration;
- are likely to result in increased movements (particularly at night) as the State Government continues to encourage freight rail as an alternative to congested road networks;
- have long-standing and fixed corridors that cannot be moved without prohibitive costs to Government;
- have irregular, and in some cases, infrequent movements; and
- make a substantial and significant contribution in economic terms.

TfNSW would appreciate the opportunity to continue to work collaboratively with Council on associated transport studies and precinct planning to deliver place based outcomes, and identification of practicable transport infrastructure and funding responsibilities. As Council would appreciate, this should consider and identify required transport infrastructure to support growth as well as an implementation strategy, including: timing, land components, costings, delivery responsibilities, and funding mechanisms.

LEP Amendment:

- It is noted that the Draft LEP 2020 Planning Proposal (Stage 1) will include a new minimum non-residential floor space control within business zones that permit residential development (Clause 4.4B). The intention of the provision is that it will result in the protection of non-residential uses and will reduce the loss of employment floor space through redevelopment. TfNSW generally supports this provision in mixed use developments around transport nodes to protect local employment, provide better place-based outcomes, and assist in achieving a 30 minute city.

- The Draft LEP 2020 Planning Proposal (Stage 1) also proposes changes to residential controls to provide a consistent planning approach across the LGA and start to contribute to housing targets through realigning the zoning and housing typologies in certain areas. This includes rezoning the existing R3 land with a permissible height of 12m or great to an R4 zone to create a hierarchy of residential zones whilst retaining the existing FSR and height of buildings. Based on access to services and the need to provide more housing choice, precincts in Aspley Estate, Rowe Street, north and west of Peakhurst Park and Culwulla Street are proposed to be rezoned from R2 to R3. As the R3 zone permits multi dwelling housing, whereas the R2 zone does not, Council estimates this rezoning will equate to an estimated additional 325 dwellings in these areas. A small area in Hillcrest Avenue is proposed to be rezoned from R2 to R4, permitting residential flat buildings, equating to an additional 9 dwellings.
- TfNSW is supportive of providing housing within walking distance to transport infrastructure, such as train stations and frequent bus services, encouraging the efficient use of existing public infrastructure.
- Any development at Treacy Street Car Park which is proposed for B4 Mixed Use, must have regard to the function of the rail corridor as an important freight corridor. The adjacent Illawarra rail line is part of the National Land Transport Network and a vital connection between Sydney and the Illawarra region.
- As Council would be aware, the NSW transport cluster owns a number of land parcels within the Georges River LGA, with some of these parcels currently underutilised until required for operation purposes, and others identified as surplus. As part of any future planning and LEP amendment, TfNSW would appreciate the opportunity to work in collaboration with Council to identify development potential for underutilised and surplus land owned by the NSW transport cluster to assist Council in achieving its housing and commercial centres strategies.