



Planning Proposal to amend Georges River Local Environmental Plan 2021

84D ROBERTS AVENUE
MORTDALE

MAY 2024



QUALITY ASSURANCE

Project:	Planning Proposal to amend Schedule 1, Item 5 of GRLEP 2021 to include a 'medical centre' as an additional permitted use
Address:	84D Roberts Avenue, Mortdale
Council:	Georges River Council
Author:	Think Planners Pty Ltd
Client:	Romanous Developments
Template	Local Environmental Plan Making Guideline (August 2023)

Date	Purpose of Issue	Rev	Author	Authorised
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INTRODUCTION

This Planning Proposal aims to explain the intended effect and justify a proposed amendment to Georges River Local Environmental Plan 2021 (GRLEP 2021) and demonstrate the strategic merit of the amendment proceeding.

Think Planners has prepared the Planning Proposal on behalf of Romanous Developments, the owner of the Mortdale Plaza Centre.

This Planning Proposal seeks to amend the GRLEP 2021 to allow a medical centre located within the retail shopping centre, Mortdale Plaza. The proposed amendment is proposed to be facilitated by:

- Updating Schedule 1, Cl.5 (2) to include “medical centre” as an additional permitted use.

The Planning Proposal relates to 84D Roberts Avenue, Mortdale, referred to within this document as the ‘*subject site*’. The subject site is situated on the southern edge of the Peakhurst Industrial Area, an area subject to the E4 General Industrial under GRLEP 2021.

While the zoning of the subject site is industrial, the context is more neighbourhood-based, with the St George Masonic Club being located at No.86 Roberts Avenue, a reserve to the west, along with open space and residential suburbs to the south. Whilst the eastern and northern boundaries are to industrial land, it is notable that residential land is nearby to the east, which blends into the industrial area.

It is also noted that the locality is some considerable distance from other neighbourhood centres which provide for the shopping needs of residents and workers. Accordingly, the subject site is well placed to continue providing services that nearby residents and workers require without driving further distances to other shopping areas.

The amendments proposed in this Planning Proposal are specific to the site and will facilitate an additional use within an existing retail shopping centre. There are no changes to the building form or parking required on the site, nor are there any changes required to site access to facilitate the proposed additional medical centre use. In short, the existing approval provides the floor space and parking required to contain the anticipated GFA of the Mortdale Plaza comfortably.

The proposed amendments are driven by a desire to provide a holistic centre that is more efficient for the community, providing a single location where they can shop, visit the pharmacy, and, if needed, stop at the medical centre. This minor amendment will

provide a neighbourhood centre that meets the community's local needs, providing a positive benefit for all users in the community.

The Planning Proposal has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979 and the Department of Planning and Environment (DPE) document 'Local Environmental Plan Making Guideline (August 2023).

The Planning Proposal is supported by –

- Economic Statement by MacroPlan; and
- Traffic and Parking Assessment Report by Varga Traffic Planning Pty Ltd

This Planning Proposal proposes including a 'medical centre' as an additional permitted use within the existing site-specific provision over 84D Roberts Avenue, Mortdale. The intent is to provide a further complementary use on the site to the broader offering for the premises.

Support for the Planning Proposal is sought, and the subsequent referral to the Department of Planning and Environment for Gateway Determination and public exhibition is sought.

BACKGROUND

This Planning Proposal has been prepared following discussions, reporting, assessments and meetings with relevant planning authorities and urban design experts.

The following timeline represents the relevant background leading up to the Planning Proposal:

Date	Key event
2009	DA approved for a three storey mixed use development comprising supermarket, bulky goods retail, gymnasium and office with basement parking at 84 D Roberts Avenue, Mortdale.
10 September 2019	PP-2020-820 is made by the DPE. The PP facilitates an amendment to the <i>Hurstville Local Environmental Plan 2012</i> and permits retail premises, bulky goods premises and centre-based child care facilities as additional permitted uses in relation to 84D Roberts Avenue, Mortdale.
8 October 2021	Georges River LEP 2021 is made. This LEP harmonised planning controls into a single instrument. It continued the same approach for the subject site as the former HLEP 2012.
24 October 2023	A scoping letter was sent to Georges River Council seeking a meeting to discuss the requirements of a future planning proposal to include a 'medical centre' as an additional permitted use at the subject site.
30 October 2023	Email response received from Georges River Council. The email advice noted the following: <p><i>We have reviewed the attached information and advise that given the pre-planning Proposal does not involve any changes to the built form, we have no issues if you want to proceed with lodging the Planning Proposal through the DPE's Planning Portal.</i></p> <p><i>Alternatively, we are happy to have an online meeting to discuss lodgement requirements.</i></p> <p><i>Essentially your Planning Proposal will need to justify the proposed medical centre additional permitted use, particularly strategic and site-specific merit under the DPE's Local Plan Making Guideline, and impacts on traffic, parking and employment.</i></p>
November 2023	<ul style="list-style-type: none"> - Planning Proposal submitted to Georges River Council - Council requests additional information: <ul style="list-style-type: none"> o Traffic Report o Economic Statement
April 2024	Updated Planning Proposal submitted to Georges River Council
May 2024	Response to Council feedback and updated PP submitted

SITE AND LOCALITY DESCRIPTION

LEGAL DESCRIPTION

The subject site is legally described as Lot 21 DP 542051, more commonly known as 84D Roberts Avenue, Mortdale. Within the community, the subject site is known as the Mortdale Plaza.

SUBJECT SITE

The subject site is irregular battle-axe shape and has a total area of about 11,170m². Occupying the site is the Mortdale Plaza Shopping Centre, a three storey building located along the northern and eastern boundaries of the site. The centre includes retail floor space over three levels and contains more than 400 parking spaces within the building footprint. The site is accessed by pedestrians and vehicles from Roberts Avenue. To the west of the development is a landscaped creek/ drainage area within the site's boundaries.

The aerial photographs in Figures 1 and 2 show the subject site and the immediate context.

Figure 1: Aerial photograph of the subject site (Source: Six Maps)

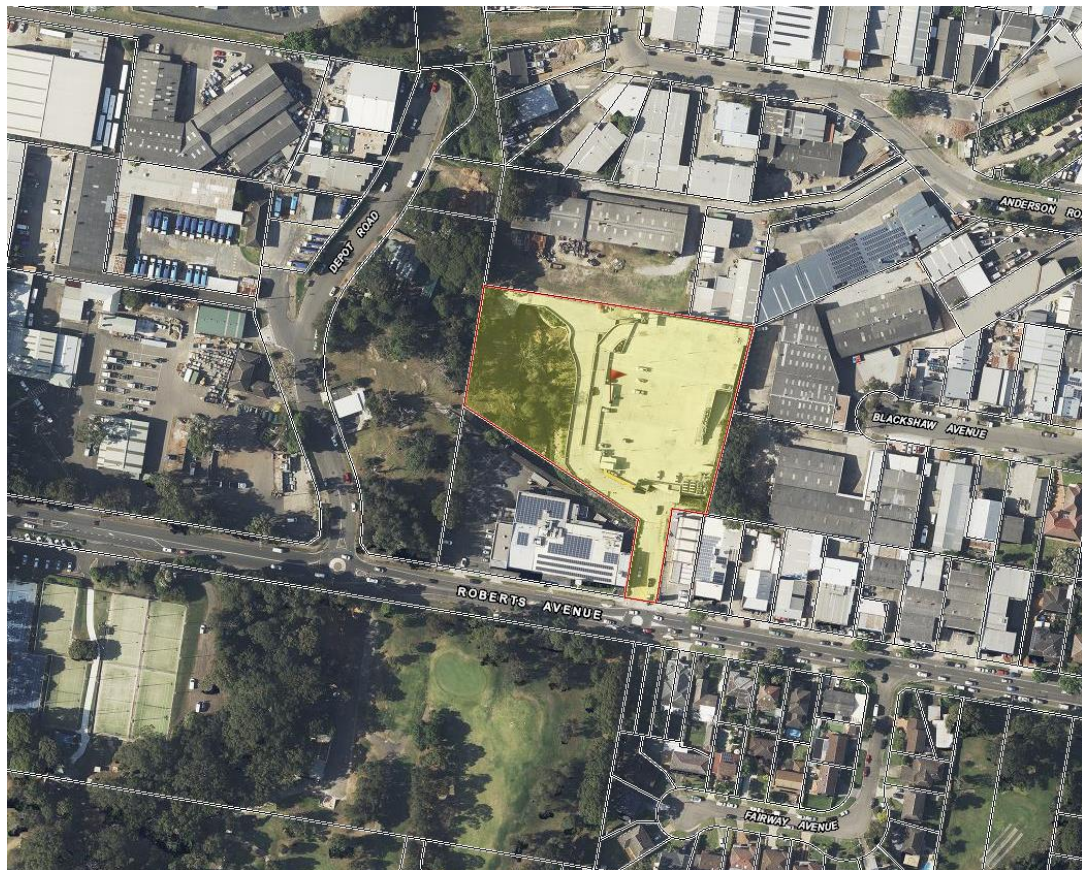
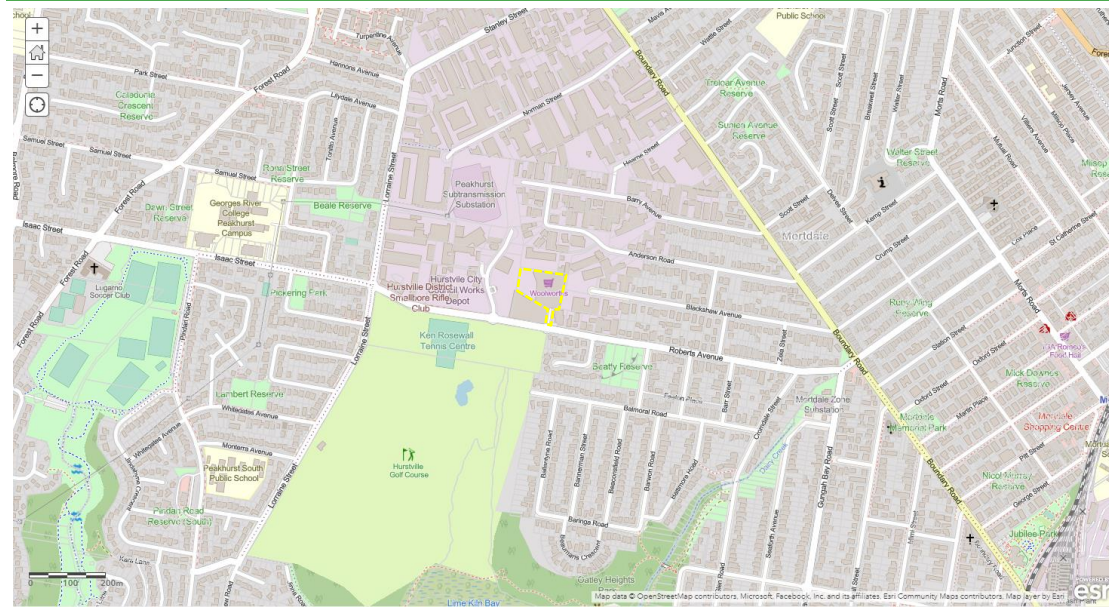


Figure 2: Aerial photograph of the site and locality (Source: Open Street Maps, Spatial Viewer)



Mortdale Plaza provides a neighbourhood centre function having the following significant uses:

- Woolworths (supermarket)
- Liquor shop
- Pharmacy
- Cafe
- Gym
- Child Care Centre
- Vacant retail space

A site-specific clause within the LEP applies over the subject site and permits retail premises, specialised retail premises, and child care centre uses that would otherwise be prohibited in the zone.

LOCALITY

The subject site is located on the northern side of Roberts Avenue, a local road providing an east connection to Boundary Road and a west connection to Forest Road. The 944 bus route travels along Roberts Avenue, with a stop at the subject site.

Given its edge location within the industrial park, the site is within an eclectic mix of uses. To the north is industrial land; to the east, industrial land and housing; to the south, residential land and open space; and to the west, more industrial land with a small area of public bushland.

The immediate southern neighbour is the St George Masonic Club, which provides a defined cluster of neighbourhood centres servicing land uses. The western portion of the site is landscaped, which transitions into the public bushland reserve. This and the immediate residential properties to the east provide a character distinct from the broader industrial area.

Photographs overleaf and in the following pages are provided to illustrate the context of the locality.

Figure 3: Roberts Avenue looking west from the roundabout in front of the subject site (Google)



Figure 4: Roberts Avenue looking east from the round about entering the subject site (Google)

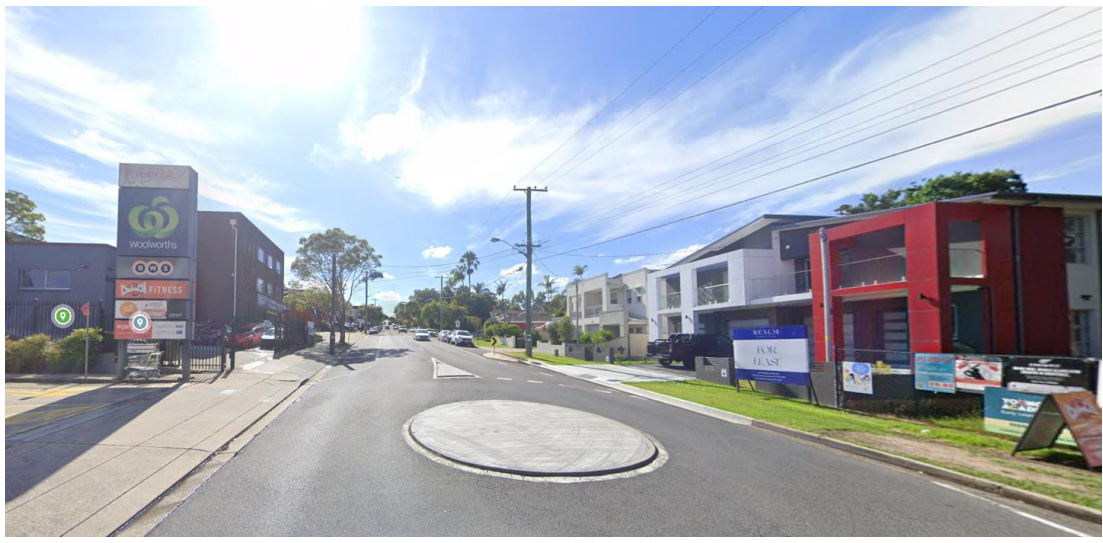


Figure 5: Entry to the subject site from Roberts Avenue



Figure 6: Opposite side of the road from the subject site.



LOCAL PLANNING FRAMEWORK

GEORGES RIVER LOCAL ENVIRONMENTAL PLAN 2021

The environmental planning instrument applying to the subject site is *Georges River LEP 2021*. This section provides a summary of the key provisions within the LEP that are relevant to the subject site.

Zone

The land is zoned E4 General Industrial, with no change to zoning proposed (Figure 7).

Figure 7: GRLEP 2021 Zoning Map extract



The land use table for the E4 General Industrial Zone is provided below for context. Uses permitted in the zone relevant to this proposal are highlighted in green, and those prohibited are highlighted in red.

E4 General Industrial Zone

1. Objectives	<ul style="list-style-type: none"> To provide a range of industrial, warehouse, logistics and related land uses. To ensure the efficient and viable use of land for industrial uses. To minimise any adverse effect of industry on other land uses. To encourage employment opportunities. To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers. To encourage a range of uses that support the repair, reuse, recycling, remanufacturing and reprocessing of waste.
2. Permitted without consent	Nil
3. Permitted with consent	Agricultural produce industries; Depots; Freight transport facilities; Funeral homes; Garden centres; General industries; Goods repair and reuse premises; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Light industries; Local distribution premises; Neighbourhood shops; Oyster aquaculture; Take away food and drink premises; Tank-based aquaculture; Warehouse or distribution centres; Any other development not specified in item 2 or 4
4. Prohibited	Agriculture; Air transport facilities; Airstrips; Amusement centres; Boat launching ramps; Boat sheds; Business premises; Camping grounds; Caravan parks; Cellar door premises; Cemeteries; Charter and tourism boating facilities; Community facilities; Correctional centres; Early education and care facilities ; Eco-tourist facilities; Educational establishments; Entertainment facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Function centres; Health services facilities ; Heavy industrial storage establishments; Heavy industries; Helipads; Highway service centres; Home businesses; Home occupations; Home occupations (sex services); Jetties; Marinas; Mooring pens; Moorings; Office premises; Open cut mining; Port facilities; Pubs; Recreation facilities (major); Registered clubs; Residential accommodation; Respite day care centres; Roadside stalls; Rural industries; Shops ; Small bars; Specialised retail premises ; Tourist and visitor accommodation; Water recreation structures

Except for the gymnasium, retail uses, including specialised retail premises, are prohibited in the E4 General Industrial zone. Likewise, a 'medical centre' is also prohibited in the E4 General Industrial Zone as it falls within the term 'health services facility'. However, Schedule 1, Item 5 allows for additional permitted uses over the site, including retail premises and centre-based child care facilities.

Additional permitted uses for particular land

This clause permits certain uses on land with or without consent to occur despite what the land use table or any other clause in the LEP says, providing the land is listed in Schedule 1. The subject site is listed as Item 5 in Schedule 1 of GRLEP 2021, with the clause reproduced below for reference.

5 Use of certain land at 84D Roberts Avenue, Mortdale

- 1) *This clause applies to land at 84D Roberts Avenue, Mortdale, Lot 21, DP 542051.*
- 2) *Development for the following purposes is permitted with development consent—*
 - a) *retail premises,*
 - b) *centre-based child care facilities.*

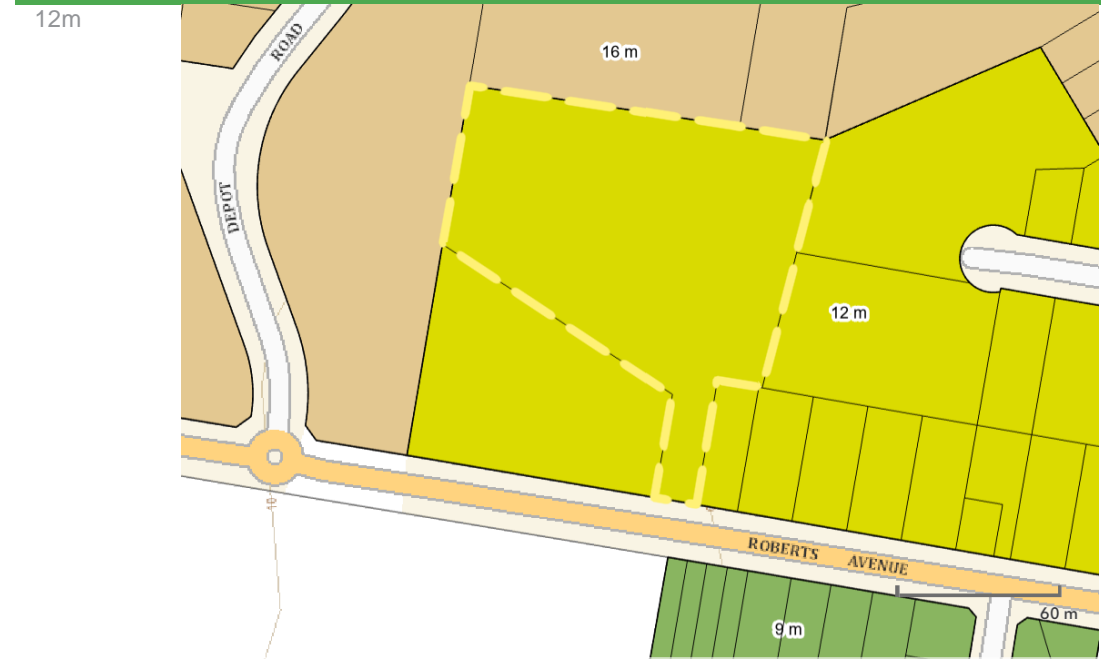
This Planning Proposal will seek to include a ‘medical centre’ as an additional permitted use on the subject site. This will allow the Mortdale Plaza to operate like all other shopping centres that balance retail and service needs.

Part 3 of this Planning Proposal will discuss the justification for the proposed amendment.

Building Height

The Height of Buildings Map indicates that the maximum building height permitted on the subject site is 12m, as shown in the figure below.

Figure 8: Height of Buildings Map extract

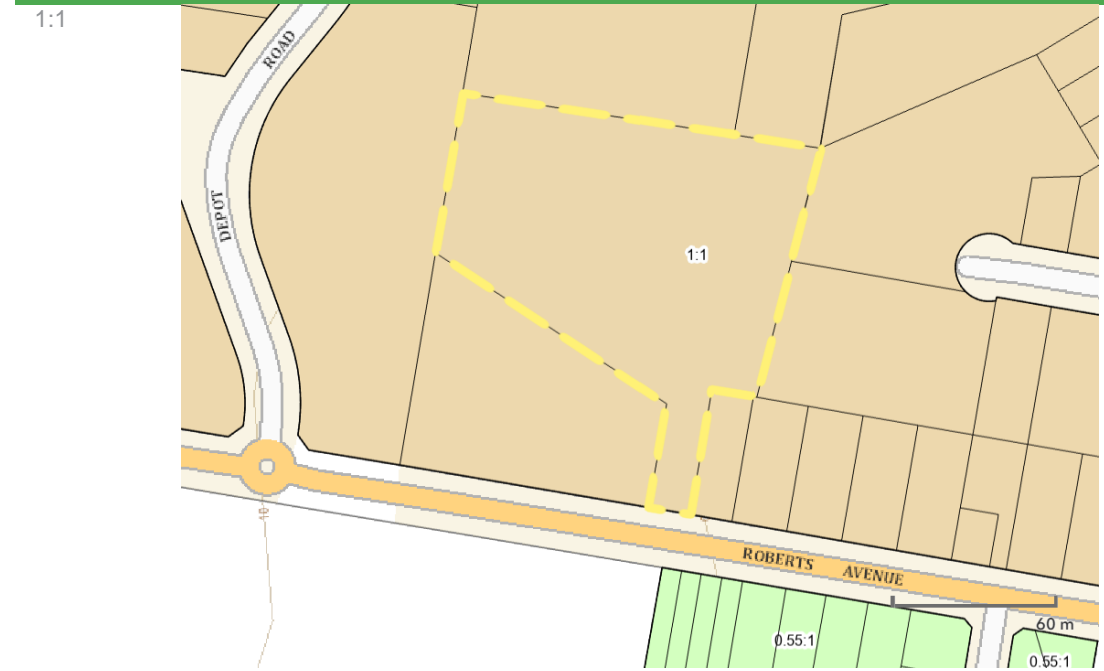


The planning proposal does not seek to change the maximum building height that applies to the subject site.

Floor space ratio

The FSR Map indicates the maximum floor space ratio applicable to the subject site is 1:1, as shown in the figure below.

Figure 9: Floor Space Ratio Map Extract



The planning proposal does not seek to change the maximum FSR that applies to the subject site.

Heritage

No heritage items are located within the site boundaries or the vicinity of the subject site, as shown in the map extract below.

Figure 10: Extract from Hills LEP 2019 Heritage Map Sheet



No further analysis of heritage is necessary, noting that the proposal concerns land use only, with the built form remaining unchanged.

GEORGES RIVER DEVELOPMENT CONTROL PLAN 2021

The Georges River Development Control Plan (GRDCP) 2021 is the primary guideline that supports GRLEP 2021. As this proposal only concerns the permissibility of land use within the existing Mortdale Plaza Shopping Centre, there is no need to consider built form or parking matters of the DCP noting that there is no increase in GFA- only redistribution of GFA to enable the medical centre component and any assessment of the DCP would occur at DA stage- likely in relation to matters of parking.

PLANNING PROPOSAL

Section 3.33 of the Environmental Planning and Assessment Act 1979 sets the required content of a planning proposal. To assist with the preparation of a planning proposal, the DPE has published the Local Environmental Plan Making Guideline (August 2023) which sets out the form and content that is required within the six parts identified below:

- **Part 1 – Objectives and intended outcomes -**
a statement of the objectives of the proposed instrument
- **Part 2 –Explanation of provisions –**
an explanation of the provisions that are to be included in the proposed instrument
- **Part 3 – Justification of strategic and site specific merit –**
justification of strategic and potential site-specific merit, outcomes, and the process for implementation
- **Part 4 - Maps –**
existing and proposed maps, where relevant, to identify the effect of the planning proposal and the area to which it applies
- **Part 5 – Community consultation –**
details of consultation undertaken with Government agencies, council or other authorities, and community consultation that is to be undertaken on the planning proposal post Gateway and during exhibition
- **Part 6 – Project timeline –**
Project timeline to detail the anticipated timeframe for the LEP making process

This Planning Proposal has been prepared consistent with the LEP Plan Making Guidelines, including the specific matters required to be addressed and the anticipated timeframe.

Site history

The subject site has operated as a shopping centre since 2009 when the former Hurstville Council approved DA08/411 for the site's development as a “three storey mixed use development comprising supermarket, bulky goods retail, gymnasium and office with basement parking”.

At the time of approval under the former Hurstville LEP 1994, bulky goods retail and gymnasium were permissible within the light industrial zone. Whilst an office premises and shops were prohibited, Cl.16 (1) of HLEP 1994 permitted these uses if the Council was satisfied that they were suitable under this clause.

Whilst this use was approved in 2009 and operated as a permissible use under HLEP 2009, the introduction of HLEP 2012 effectively prohibited the use as a retail premises, including bulky goods (which was separately defined at the time). Accordingly, in 2017, a planning proposal was prepared by the landowner and submitted to Council to legalise the site's use and to ensure that it did not have to rely on existing use rights. At this time, the planning proposal also sought to include a child care centre as an additional permitted use.

Amendment 17 to HLEP 2012 commenced on 10 September 2019 and made retail premises, bulky goods premises, and centre-based child care facilities permitted to be used with consent over the subject site. This extinguished the need for the site to operate under existing use rights. This has continued in the current GRLEP 2021, where the subject site is identified in Schedule 1 as Item 5 benefiting from additional permitted uses.

Relevant extracts from the Council Planning Proposal confirm that the intention is to ensure that the site operates as a centre (despite its zoning):

*“The NSW Government has identified that the provision of social infrastructure such as child care centres will make a significant contribution to making vibrant local centres. **Permitting the use of a centre-based child care facility on the site will contribute to further vibrancy to this local shopping centre.** Furthermore, the Planning Proposal will legitimise existing uses including the supermarket and bulky goods premises, **which will assist in the revitalisation of the precinct as the local community is granted access to a greater variety of retail premises closer to home.**” [emphasis added]*

*“The Planning Proposal has been proposed to legalise existing uses on the site to allow for future investment on the site. **This security will ensure that Mortdale Plaza can continue to develop as an essential local service provider that brings people together.**” [emphasis added]*

The above confirms that whilst the site is not a centre due to its zoning, Council considers that it has the same role and function as a centre, including community benefit. Including a medical centre as an additional permitted use over the subject site will allow it to operate in a manner similar to other centres, and importantly provide services that are needed within the local area.

PART 1 – OBJECTIVES AND INTENDED OUTCOMES

The objective of the Planning Proposal is:

- To enable a medical centre to operate at the Mortdale Plaza as a complementary use to the existing and service offerings

The intended outcomes of the Planning Proposal are to:

- Permit the use of a medical centre on the site by amending Schedule 1, Item 5.
- Provide a neighbourhood centre that meets the day to day needs of residents and workers within the local area.
- Reduce car trips by providing a medical centre that is co-located within complementary retail and other services.
- To resolve a shortage of medical centres in the local area.
- Provide opportunities for health care workers to be employed locally.

The need for medical centres

MacroPlan have provided an economic assessment of medical centres within the Georges River Council Area. This review has highlighted that there is a shortfall within the vicinity of the subject site. As can clearly be seen, medical centres are located to the east and west of the subject site, either along Forest Road or within Mortlake. This leads to a missing middle where little or no medical centres exist.

In a planning sense, including a medical centre with an established centre can assist in meeting an obvious gap in demand. Furthermore, the centre already has the sufficient parking space to accommodate a medical centre, ensuring that there are no amenity impacts to surrounding areas, or impacts to road infrastructure that has not been planned for and accommodated.

A benchmarking exercise by MacroPlan has been undertaken to confirm whether the provision within the catchment is within expected benchmarks. This assessment has confirmed that the provision of General Practitioners (46) is significantly below all benchmarks, with representing 65.7 GP's per 100,000, rather than between 115.1 and 119 GP's per 100,000 people.

Further analysis by MacroPlan has confirmed that there is an undersupply of GP's within the identified catchment (defined by ABS 2021 census data within SA2 boundaries), with this expected to continue over the forecast period to 2036. The provision of a medical centre over the subject site therefore provides a facility that is in demand, and beneficial to the local area.

Figure 11: Medical centres in the vicinity of the subject site (MacroPlan)

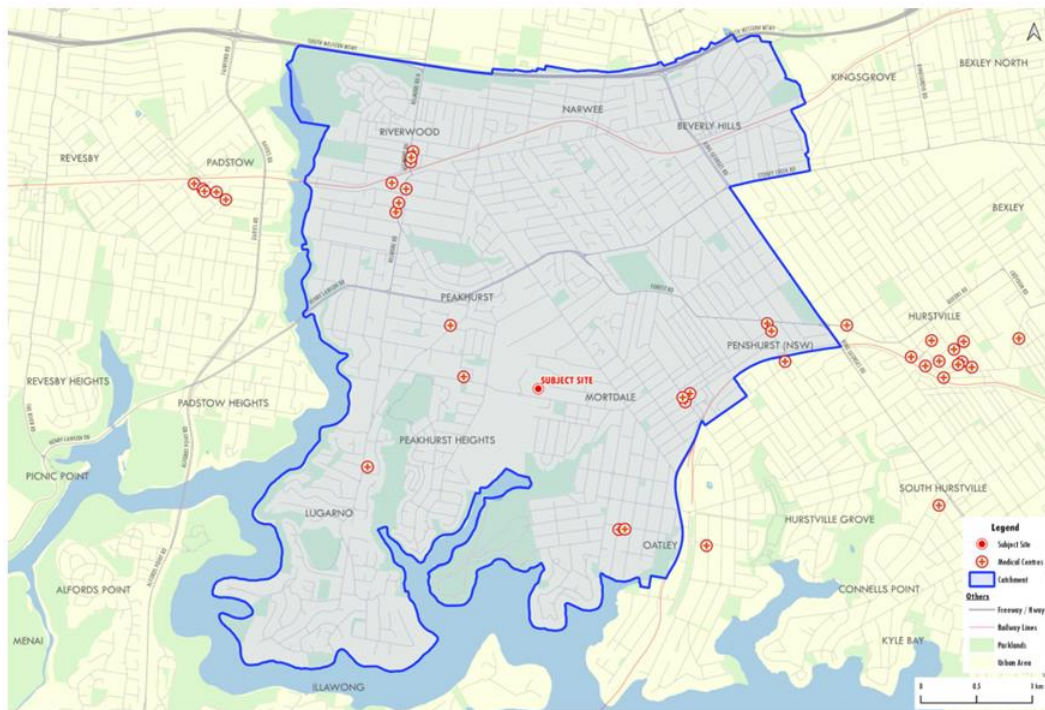


Table 3
Mortdale Plaza Medical Centre - GP provision, catchment, 2022

	Aus. metro.	NSW	Australia	Catchment
Population				69,848
GP's				46
GP's per 100,000 pop.	119.0	119.2	115.1	65.9

Source: Department of Health and Aged Care, Macroplan

Table 4
Mortdale Plaza Medical Centre - GP gap analysis, catchment

	2021	2026	2031	2036
Population	70,000	70,161	72,732	76,682
GP's*	46.0	51.0	51.0	51.0
GP's per 100,000 pop.	65.7	72.7	70.1	66.5
Required GP's**	83.3	83.5	86.7	91.5
Over (+) / under (-) supply	- 17.6	- 10.8	- 16.5	- 25.0

* Assumes 5 GP's at potential future centre **to achieve benchmark provision for metropolitan Australia
Source: Department of Health and Aged Care, Macroplan

The Planning Proposal will result in significant benefits for both the local residents and workers within the precinct. Importantly:

- The proposal is consistent with state and local government strategic planning initiatives, recognising the need for local employment options that support the 15 minute and 30 minute city ideal.
- Including a medical centre on the site will allow it to operate in a similar manner to other shopping centres, ensuring the long term viability and protection of employment generating activities
- The proposal addresses a shortfall of medical facilities within the local population catchment.
- The proposal increases accessibility to important health infrastructure within an accessible location, reducing the need to drive elsewhere.
- Local jobs for health workers are provided, enabling people to work close to where they live, improving lifestyle and overall wellbeing.
- The vibrancy of the centre will increase, enhancing its local character and desirability for residents and nearby workers to visit.
- Existing areas of industrial zoned employment land is retained.
- There is no change to the built form.
- There is no significant change in land use, with a medical centre complementary to the retail and service opportunities already available within the Mortdale Plaza.
- The proposal will not have any adverse impact on adjoining properties, public domain, or the natural environment.

PART 2 – EXPLANATION OF PROVISIONS

Part 2 of the Planning Proposal provides an explanation of the provisions that are to be included within the Planning Proposal. It includes a written explanation that is supported by mapping where relevant.

The stated objective will be achieved by:

- Amending Schedule 1, Item 5 of GRLEP 2021 to include a medical centre as an additional permitted use.

For context the definition of a medical centre is provided below:

***medical centre** means premises that are used for the purpose of providing health services (including preventative care, diagnosis, medical or surgical treatment, counselling or alternative therapies) to out-patients only, where such services are principally provided by health care professionals. It may include the ancillary provision of other health services.*

Note—

*Medical centres are a type of **health services facility**—see the definition of that term in this Dictionary.*

The proposed amendment to Schedule 1, Item 5 is provided below, with the additional text in green:

5 Use of certain land at 84D Roberts Avenue, Mortdale

- (1) This clause applies to land at 84D Roberts Avenue, Mortdale, being Lot 21, DP 542051.
- (2) Development for the following purposes is permitted with development consent—
 - (a) retail premises,
 - (b) centre-based child care facilities,
 - (c) **medical centre.**

PART 3 – JUSTIFICATION OF STRATEGIC + SITE-SPECIFIC MERIT

SECTION A – NEED FOR THE PLANNING PROPOSAL

1. Is the planning proposal a result of an endorsed LSPS, strategic study or report?

No. The planning proposal has been initiated by the proponent. Whilst the Mortdale Plaza is not within the centre's hierarchy (due to zoning), it has since its approval in 2009 operated as a centre. This has been recognised by Council in its employment lands study 2017 and also its planning proposal over the subject site:

The proposal will allow for continued investment into an existing centre and is in keeping with Objective 22¹.

A benchmarking exercise by MacroPlan has been undertaken to confirm whether the provision within the catchment (Figure 11) is within expected benchmarks. This assessment has confirmed that the provision of General Practitioners (46) is significantly below all benchmarks, with representing 65.7 GP's per 100,000, rather than between 115.1 and 119 GP's per 100,000 people.

Further analysis by MacroPlan has confirmed that there is an undersupply of GP's within the identified catchment, with this expected to continue over the forecast period to 2036. The provision of a medical centre over the subject site therefore provides a facility that is in demand, and beneficial to the local area.

Including a medical centre within the subject site will allow it to operate in a manner similar to other areas, where medical centres typically co-locate within a centre. In doing so it will address a gap within the market and facilitate consistency with the key directions and strategies described in the Plan for Growing Sydney, A Metropolis of Three Cities – Greater Sydney Region Plan, and the South District Plan, in addition to Council strategies.

Discussion on the consistency of the planning proposal with this strategy is contained in the response to *Question 3*.

2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes

¹ Georges River Council, Planning Proposal Amendment to Schedule 1 Additional Permitted Uses (PP2017/0001 - 84D Roberts Avenue, Mortdale) January 2018

It is considered that the Planning Proposal is the best means of achieving the stated objective of including a land use that would otherwise be included within a town centre. Whilst the site is not a centre (due to zoning), the former Hurstville Council and now Georges River Council have recognised its long term status as a centre, particularly by including the site as subject to additional permitted uses.

Other options considered include:

a) Existing Use Rights:

A medical centre is prohibited and therefore this option is not available. . . certainty for the centre

b) State Environmental Planning Policy (Transport and Infrastructure) 2021

A 'medical centre' is a sub-term of 'health services facility' with the Transport and Infrastructure SEPP 2021 identifying prescribed zones where the use is permitted, despite any provision of a LEP. However, this pathway is unavailable as General Industrial Zone is not identified as a prescribed zone in Division 10, Clause 2.59 of the Transport and Infrastructure SEPP 2021.

c) Formal submission to a principal LEP

Georges River LEP 2021 is a recently made principal LEP, with its review at least five years away. This pathway is, accordingly, not open.

d) Submission on Council's Planning Proposal

The Council is not preparing a planning proposal. Council has advised by feedback that they are open to considering a planning proposal prepared by a proponent.

e) Cl.4.6 Variation

The planning proposal relates to an additional land use over the land which would otherwise be prohibited. Therefore, this pathway is not available.

Accordingly, a proponent-led planning proposal is the only mechanism for achieving change over the subject site that contributes to a neighbourhood shopping centre with a diverse range of retail and service based land uses that meet community needs, whilst also reducing car dependency and facilitating greater use of active transport.

The planning proposal is therefore the most suitable means of achieving the objectives and intended outcomes for the site.

SECTION B – RELATIONSHIP TO THE STRATEGIC PLANNING FRAMEWORK

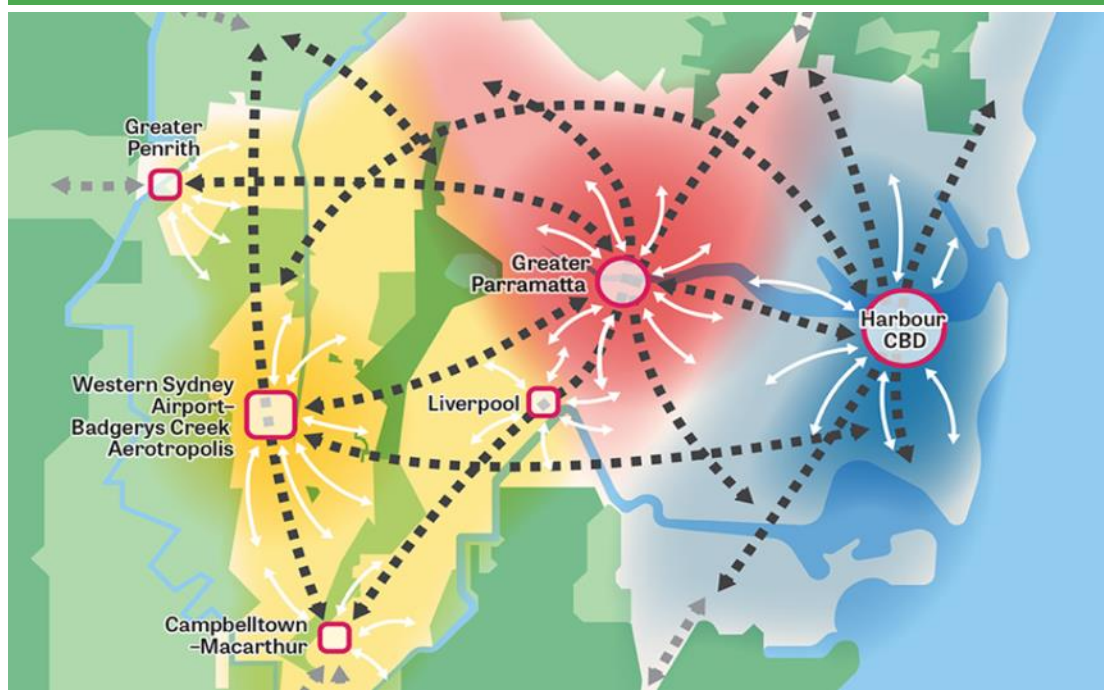
3. Will the planning proposal give effect to the objectives and actions of the applicable regional or district plan or strategy (including any exhibited draft plans or strategies)?

The stated objective of the planning proposal closely aligns with several State Government strategies, specifically the Plan for Growing Sydney, A Metropolis of Three Cities – Greater Sydney Region Plan, and the Central City District Plan.

a. A Metropolis of Three Cities – Greater Sydney Region Plan (Greater Sydney Commission March 2018)

The Metropolis of Three Cities – Greater Sydney Region Plan provides a framework for the predicted growth in Greater Sydney. Key themes based on delivering a metropolis of three 30-minute cities which are a follow on from the ten directions envisioned by the Greater Sydney Commission. This vision is set out in the structure plan shown in Figure 12 below.

Figure 12: Extract from A Metropolis of Three Cities - Greater Sydney Region Plan March 2018



The four key themes are focused on infrastructure and collaboration, liveability, productivity and sustainability.

The planning proposal is aligned with these key themes, directions, metrics and objectives by:

The table below provides a summary of relevant priorities.

THEME	DIRECTION	STRATEGIC ALIGNMENT
Infrastructure and collaboration	1. A city supported by infrastructure	<p>This direction has three objectives, with the indicator for success being improved 30 minute access to a metropolitan centre or cluster. Whilst not strictly relevant to the subject proposal, the principles of efficient use of infrastructure to facilitate a compact city is.</p> <p>Including a medical centre as an additional permitted use over the subject site maximises use of a purpose built shopping centre, which was first approved in 2009 and has operated continuously since its opening. With a major anchor tenant being Woolworths, the centre is an ideal location to have a medical centre which ensures maximum efficiency in terms of existing infrastructure use.</p> <p>Further the proposal also maximises use of existing planned parking spaces within the centre, which removes the need for new car parks or on street parking in residential areas for those seeking attention from a doctor.</p> <p>The proposal also contributes to better use of public transport infrastructure by providing a medical centre in a highly accessible location by public transport, reducing the need for private vehicle use.</p>
Liveability	3. A city for people	<p>This direction seeks to put people at the heart of planning decisions. Its indicator is the improved accessibility to local centres by walking. Whilst not relevant to this proposal, the site is highly accessible by a number of means including walking. By including a medical centre as an additional permitted use on the subject site, the centre becomes more diversified and relevant to the local community. This places people at the heart of the planning decision and can encourage people to walk to the medical centre when needed, rather than having to drive to a destination further away.</p>
Productivity	6. A well connected city	<p>Not relevant to this proposal. However, the proposal is consistent with this direction by providing a local destination that is accessible by a number of means including active transport.</p>

THEME	DIRECTION	STRATEGIC ALIGNMENT
	<p>7. Jobs and skills for the city</p>	<p>This direction relates to developing metropolitan and strategic centres that make the economy stronger. The indicator of success is increased jobs in these locations.</p> <p>While it is not relevant to this proposal, the planning proposal is consistent with the intent of the direction which is to increase employment opportunities within accessible locations. The subject site is an existing centre and a medical centre within this area is desirable both in terms of creating more local jobs, but also local jobs within the concept of both a 15 minute and 30 minute city.</p> <p>The proposal also does not seek to rezone any land, rather it is contained within a purpose built local shopping centre that is anchored by Woolworths. This ensures consistency with objectives that seek to retain areas of industrial zoned land. The Gateway Report for the previous planning proposal over the subject site noted the following:</p> <p><i>It is considered that the proposal is consistent with the plan as it:</i></p> <ul style="list-style-type: none"> • <i>does not seek to rezone industrial land;</i> • <i>does not reduce the availability of existing industrial land;</i> • <i>permits exiting approved uses on the site;</i> <i>and</i> • <i>provides the opportunity for more diverse employment uses on the site.</i>
Sustainability	<p>8. An efficient city</p>	<p>This direction aims to ensure that resources are used wisely. An indicator of success is a reduction in transport related gas emissions, along with reduced energy use per capita.</p> <p>The planning proposal is consistent with this direction. It facilitates the consolidation of economic activity within an existing centre. This can contribute to a reduction in transport related greenhouse gases by reducing the distance people need to travel to access a medical centre, ensuring that land uses a co-located to prevent the need for multiple trips to different destinations, and facilitating bus based or active transport modes to access the centre.</p>

THEME	DIRECTION	STRATEGIC ALIGNMENT
		Likewise, the planning proposal facilitates an additional land use within the existing Mortdale Plaza shopping centre. Importantly, this is a purpose built location and does not necessitate the construction of a new building. This means that both energy and resource use is efficiently used.

b. South District Plan (Greater Sydney Commission March 2018)

The (former) Greater Sydney Commission released the South District Plan on 18 March 2018. The intent of this plan is to provide a growth structure plan that has at its foundation better social, economic and environmental outcomes. Importantly when considering the original planning proposal that sought to formalise the existing use rights as a permitted use on the site, in addition to including a child care centre as a permitted use, this was supported by both the DPE and the Greater Sydney Commission. The Gateway Report notes the following:

Of key relevance to the proposal is Planning Priority S10 Retaining and managing industrial and urban services land, which states that councils must retain and manage industrial and urban services land, protecting it from conversion to other land uses.

The proposal does not seek to amend the zoning or development standards applying to the industrial-zoned site. It seeks to manage the existing uses on-site and provide alternative urban services uses to those that are already permitted on-site.

The existing development is recognised as a significant local shopping centre anchored by a major supermarket, which provides essential retail functions for residents and workers. The applicant has stated that the proposed use of a centre-based child care facility will be provided within the existing Mortdale Plaza development. It is considered that the child care centre would be consistent with other urban services uses provided on-site and across the wider Peakhurst Industrial Precinct.

The proposal is consistent with the South District Plan as:

- it does not seek to rezone industrial land;*
- it does not result in the reduction of available existing industrial land;*
- the site is located at the interface of light industrial, residential and recreational land uses; and*
- the additional land uses will promote opportunities for employment diversification and growth.*

The Greater Sydney Commission has advised that the planning proposal should be supported on the basis that it involves regularising an existing, approved retail use and allows a child care centre. The Commission has also noted that the planning proposal is not to rezone the land but to allow additional permitted uses. The issuing of this Gateway does not hinder the objectives or the ongoing implementation of the District Plan.

This planning proposal remains entirely consistent with the South District Plan as it seeks to only include a medical centre as an additional permitted use on the site, a location that is an existing retail shopping centre. The table below addresses relevant priorities of the District Plan.

THEME	DIRECTION	STRATEGIC ALIGNMENT
Liveability	3. Providing services and social infrastructure to meet people's changing needs	The proposal seeks to include a medical centre as an additional permitted use on the subject site. A map review of the locality has highlighted a distinct need for a medical centre within a walkable distance of homes. The proposal will facilitate the additional use within an existing centre known locally as the Mortdale Plaza, a centre that provides a wide range of services that meets the needs of its surrounding residents and workers. Including a medical centre will further contribute to the attractiveness of this location and its long term viability.
	6. Creating and renewing great places and local centres, and respecting the district's heritage	The will contribute to the ongoing attractiveness and economic performance of the Mortdale Paza centre. This will have positive effects on and will support the overall hierarchy of centres within Georges River by containing activities within existing centres.
Productivity	10. Retaining and managing industrial and urban services land	<p>The proposal does not seek to rezone industrial land but rather allow for a medical centre use that would typically be expected to occur within any centre, be it neighbourhood, local, strategic or metropolitan. Whilst the subject site is not formally recognised in the centre's hierarchy (because of its zoning), it is recognised by Council as a centre in both its employment study and previous planning proposal over the subject site:</p> <p><i>The existing development is recognised as a significant local shopping centre anchored by a major supermarket which provides essential retail functions for the surrounding residents and workers.</i></p> <p>Importantly, the medical centre use will be contained with the existing Mortdale Plaza which</p>

THEME	DIRECTION	STRATEGIC ALIGNMENT
	12. Delivering integrated land use and transport planning and a 30-minute city	<p>has the necessary floor area and parking to contain this use. This ensures that there will be no reduction to the area of land zoned for industrial purposes.</p> <p>The proposal remains consistent with this direction as it provides local employment and important local services close to residents and workers.</p>
Sustainability	17. Reducing carbon emissions and managing energy, water and waste efficiently	<p>The planning proposal is consistent with this direction. It facilitates the consolidation of economic activity within an existing centre. This can contribute to a reduction in transport related greenhouse gases by reducing the distance people need to travel to access a medical centre, ensuring that land uses a co-located to prevent the need for multiple trips to different destinations, and facilitating bus based or active transport modes to access the centre.</p> <p>Likewise, the planning proposal facilitates an additional land use within the existing Mortdale Plaza shopping centre. Importantly, this is a purpose built location and does not necessitate the construction of a new building. This means that both energy and resource use is efficiently used.</p>

4. Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?

a. Georges River Local Strategic Planning Statement

Implemented in February 2020, the Georges River Local Strategic Planning Statement (LSPS) is a 20 year land use vision for the LGA. The vision seeks to recognise the local character and leverage the social, environmental and economic values and strengths of the area. It is aligned with and implements the higher order strategic vision, directions and priorities of the Region Plan and South District Plan.

Relevant planning priorities are addressed in the table below.

THEME	PRIORITY	STRATEGIC ALIGNMENT
1. Access and movement in 2040	P1. We have a range of frequent, efficient transport options to connect people, goods, services, businesses and educational facilities	Whilst not strictly relevant to the proposal, the subject site remains consistent with the intent of this priority. Including a medical centre within the subject site will ensure that people can access essential services at the Mortdale Plaza, rather than having to travel elsewhere.
	P2. Everyone can navigate and experience the LGA in safety	Not applicable
	P3. Roads, footpaths and cycleways are safe, accessible and free of congestion	Not applicable
2. Infrastructure and community in 2040	P4. Collaboration supports innovation and delivers infrastructure, services and facilities	Not applicable
	P5. The community is involved in planning our future	The Planning Proposal will be publicly exhibited.
	P6. Everyone has access to efficient digital connectivity	Not applicable
3. Housing and neighbourhoods in 2040	P7. Residential suburbs will be protected and retained unless identified as areas of change or investigation	The planning proposal facilitates a medical centre within the existing Mortdale Plaza shopping centre. This ensures that a use that otherwise could occur in a residential zone, is more appropriately co-located with retail uses.
	P8. Place-based development, quality building design and public art deliver liveable places	Not applicable
	P9. A mix of well-designed housing for all life stages caters for a range of lifestyle needs and incomes	Not applicable
	P10. Homes are supported by safe, accessible, green, clean, creative and diverse facilities, services and spaces	Not applicable
	P11. Aboriginal and other heritage is protected and promoted	Not applicable

THEME	PRIORITY	STRATEGIC ALIGNMENT
<p>4. Economy and centres in 2040</p>	<p>P12. Land is appropriately zoned for ongoing employment growth</p>	<p>The planning proposal retains the existing zoning, with an additional permitted use as a medical centre. It is noted that a medical centre could exist in the nearby residential land. However, it is better co-located within a purpose built shopping centre, which was first approved by Hurstville Council in 2009 and has continuously operated since, with its status also recognised by the now Georges River Council who have granted the site additional permitted use status which facilitates a diverse range of retail uses, and also uses like centre based child care centres.</p>
	<p>P13. Planning, collaboration and investment delivers employment growth and attractive, lively, accessible and productive centres</p>	<p>Not applicable, however the planning proposal will not impact on the operation or growth of planned centres as it is itself a historical centre despite the industrial zoning.</p>
	<p>P14. Hurstville, Beverly Hills and Kogarah are supported to grow nighttime entertainment, dining and other recreational opportunities</p>	<p>Not applicable.</p>
	<p>P15. All local centres are supported to evolve for long-term viability</p>	<p>Whilst this direction strictly does not apply, the principle does. Council have recognised the status of the Mortdale Plaza as a type of centre by adding retail premises and child care centre as an additional permitted use. This is consistent with the development consent issued in 2009 by Hurstville Council for a “three storey mixed use development comprising supermarket, bulky goods retail, gymnasium and office with basement parking”</p> <p>Therefore, by permitting a medical centre as an additional permitted use on the site, Council is supporting the long term viability of a location that acts as a centre, noting its context on the edge of an industrial zone, close to green areas and recreation area (including club) and residential dwellings.</p>

THEME	PRIORITY	STRATEGIC ALIGNMENT
5. Environment and open space in 2040	P16. Our waterways are healthy and publicly accessible	Not relevant
	P17. Tree canopy, bushland, landscaped settings and biodiversity are protected, enhanced and promoted	Not relevant
	P18. An environmentally friendly approach is applied to all development	Not relevant
	P19. Everyone has access to quality, clean, useable, passive and active open and green spaces and recreation places	Not relevant
	P20. Development is managed to appropriately respond to hazards and risks	Not relevant

b. Employment Lands Study 2017

The Georges River Employment Lands Study (ELS) was prepared by Council in 2017 and aimed to provide a strategic direction for employment lands across the Georges River local government area, particularly with regard to ensuring that there was adequate supply of employment land to cater for projected demand.

The ELS identified the subject site as within the Peakhurst Industrial Area and recommended that it retains its existing industrial zoned land area. Importantly, the strategy recognises Mortdale Plaza as one of the key features and strengths of the area. This is due to the amenity it provides, along with the desired future character. Importantly, the ELS recommended that Mortdale Plaza be retained, signifying an acknowledgement of its value in terms of providing retail and service uses to both the nearby residential areas, but to the industrial precinct itself. The strategy particularly noted that the centre was making a valuable contribution to the unmet retail demand within the area.

Including a medical centre within the existing building remains consistent with the recommendations of the ELS as it consolidates non industrial employment within an existing centre, ensuring that the quantum of industrial zoned land is retained.

c. Georges River Industrial Zoned Land Review

On 17 December 2018, Georges River Council adopted its Industrial Zone Land Review Study. This study found that the areas of existing zoned industrial land should be retained, with there being no clear case to rezone any of the industrial precincts.

The subject site has since 2009 essentially acted as a centre, a status that has consistently been recognised by Council via its employment land review and subsequent planning proposal for additional permitted uses. Including a medical centre within the existing shopping centre building will have no impact on the available land for industrial. This planning proposal accordingly remains consistent with the Industrial Zone Land Review Study as it does not rezone any industrial land.

5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

The planning proposal is consistent with all relevant studies and strategies prepared by the NSW Government as discussed in the table below.

Document	Discussion
<p>Future Transport Strategy 2056</p>	<p>The Future Transport Strategy sets the direction of the NSW Government to improve the transport system across the state. It intends to make decisions by putting people and places at the centre to ensure that customers, community and the economy experience maximum benefits.</p> <p>The planning proposal over the subject site is consistent with key strategic directions within the strategy including:</p> <ul style="list-style-type: none"> - C1.1 Enhance 30-minute metropolitan cities - C2.1 Support car-free, active, sustainable transport options - C3.1 Provide transport choices for people no matter where they live - P1.2 Support growth around public transport - P2.1 Support thriving and healthy 15-minute neighbourhoods
<p>Staying Ahead: State Infrastructure Strategy 2022 – 2042</p>	<p>The State Infrastructure Strategy provides a 20-year plan for the NSW Government for strategic investment decisions. The strategy aims to provides recommendations that aid the growth and productivity of the State to improve living standards for the community.</p> <p>This proposal improves the range of uses within an existing centre, allowing it to better meet the needs of the community, including residents and workers. This maximises the efficient use of infrastructure both on the site and external to the site, for example public transport. It also makes a valuable contribution to living standards by providing accessible medical centre that is co-located with other retail and services within the Mortdale Plaza.</p>

Document	Discussion
Net Zero Plan	The Net Zero Plan outlines the NSW Government's plan to grow the economy, creating jobs and reducing emissions over the next decade. The planning proposal is consistent with the aims of the net zero plan, with a future medical centre being able to make a valuable contribution to the overall net zero goals of the State. There are any number of methods including the use of green energy, use of energy efficient devices, and being located within a centre that minimises the need for people to make multiple car trips.

6. Is the planning proposal consistent with applicable State Environmental Planning Policies?

The following table provides a brief assessment of consistency against each State Environmental Planning Policy (SEPP) relevant to the planning proposal.

Consideration of relevant SEPPs	Strategic Alignment
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Not applicable. The proposal relates to a land use only that will occur within the footprint of the existing Mortdale Plaza Shopping Centre.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	Not applicable.
State Environmental Planning Policy (Housing) 2021	Not applicable.
State Environmental Planning Policy (Industry and Employment) 2021	Not applicable. Chapter 2 relates to Western Sydney Employment area and does not apply. Chapter 3 relates to advertising and signage and is not a consideration for a Planning Proposal.
State Environmental Planning Policy (Planning Systems) 2021	Not applicable.
State Environmental Planning Policy (Precincts—Central River City) 2021	Not applicable
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021	Not applicable
State Environmental Planning Policy (Precincts—Regional) 2021	Not applicable

State Environmental Planning Policy (Precincts—Western Parkland City) 2021	Not applicable
State Environmental Planning Policy (Primary Production) 2021	Not applicable
SEPP (Resilience and Hazards) 2021	Consistent, with this addressed during the earlier Planning Proposal over the subject site. It is noted that the subject site is flood prone however the proposal is within the footprint of the existing building and will not require any external works.
State Environmental Planning Policy (Resources and Energy) 2021	Not applicable
State Environmental Planning Policy (Sustainable Buildings) 2022	Not applicable.
SEPP (Transport and Infrastructure) 2021	Consistent. The proposal is for a medical centre with a future development application being able to address any key requirements of the Transport and Infrastructure SEPP 2021. However, the existing DA for the shopping centre has provided all parking for the site, with no external areas required and existing access appropriate.

Draft State Environmental Planning Policy (Environment SEPP)

The draft Environment SEPP aims for the protection and management of the natural environment. Since its exhibition between 31 October 2017 and 31 January 2018, the SEPP has not been finalised and remains in draft form. Since this time, the DPE has consolidated a number of SEPPs, with the Biodiversity and Conservation SEPP consolidating many of the SEPPs that had been addressed in the draft Environment SEPP. Whilst the Environment SEPP status is unknown, it does not appear as if it will be made imminently.

7. Is the planning proposal consistent with applicable Ministerial Directions (section 9.1 Directions) or key government priority?

The following table provides a brief assessment of consistency against each S.9.1 Direction relevant to the Planning Proposal.

Ministerial Directions	Consistency	Strategic Alignment
Focus Area 1: Planning Systems		

1.1 Implementation of Regional Plans	Yes	<p>This proposal is consistent with the objectives and strategies of A Plan for Growing Sydney as outlined in the Planning Proposal report.</p> <p>The Planning Proposal is consistent with the NSW Government's A Plan for Growing Sydney. Refer to Part 3 – Justification of this report, Section B – Relationship to Strategic Planning Framework of the Planning Proposal for an explanation of the consistency of the Planning Proposal with A Plan for Growing Sydney.</p> <p>The Planning Proposal achieves the overall intent of the Plan and seeks to implement the achievement of its vision, land use strategy, policies, outcomes or actions. The proposal is consistent with this Direction as it:</p> <ol style="list-style-type: none"> 1. Retains the existing area of industrial land; 2. Preserves the availability of existing industrial land supply; 3. Enable a medical centre to collocate within an existing shopping centre that services the neighbourhood and employment area. 4. Improves the diverse employment uses on the site, creating more local jobs and potential for living and working local.
1.2 Development of Aboriginal Land Council Land	N/A	The proposal relates to the use of an existing building with no ground penetration works required.
1.3 Approval and Referral Requirements	N/A	The Planning Proposal does not introduce any provisions that require any additional concurrence, consultation, or referral.
1.4 Site Specific Provisions	Yes	The subject site has additional permitted uses via Schedule 1, Item 5 of the GRLEP 2021. This planning proposal seeks to include a medical centre as an additional permitted use on the site. There is no change to any other provision in the LEP, with all relevant standards including height and zoning remaining in their current form.
1.4A Exclusion of Development Standards from Variation	N/A	The Planning Proposal does not seek to exclude any development standard. Therefore this is not relevant.
Focus Area 1: Planning Systems – Place Based	N/A	Not relevant to the subject planning proposal.
Focus Area 2: Design and Place	N/A	Directions not made

Focus Area 3: Biodiversity and Conservation	N/A	Not relevant to the subject planning proposal.
3.1 Conservation Zones	N/A	Not relevant to the subject planning proposal.
3.2 Heritage Conservation	Consistent	There are no items, areas, objects and places of environmental heritage significance and indigenous heritage significance, on the subject site. Accordingly, there is no impact on any areas requiring heritage conservation.
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	N/A	Not relevant to the subject planning proposal.
3.5 Recreational Vehicle Areas	N/A	Not relevant to the subject planning proposal.
3.6 Strategic Conservation Planning	N/A	Not relevant to the subject planning proposal.
3.7 Public Bushland	Consistent	There are no areas of public bushland on the subject site
3.8 Willandra Lakes Region	N/A	Not relevant to the subject planning proposal.
3.9 Sydney Harbour Foreshores and Waterways	Consistent	The subject site is well away from any foreshore and waterway area. A future development application can provide the necessary measures to manage water quality.
3.10 Water Catchment Protection	Consistent	The subject site is within the Georges River Catchment. It is however within an existing building and will not require any additional buildings or parking areas to contain the use. Therefore, there is no impact from the proposal on the Georges River Catchment.
Focus Area 4: Resilience and Hazards		
4.1 Flooding	Justifiably consistent	The subject site is identified as flood prone land, being subject to the 1% AEP and PMF. The proposal is within an existing shopping centre building, with this proposal only seeking to add a medical centre as an additional permitted use. There is no additional floor area as a result of this proposal.
4.2 Costal Management	N/A	Not relevant to the subject planning proposal.

4.3 Planning for Bushfire Protection	Consistent	The site is not impacted by a Bushfire Map, nor is it bushfire prone.
4.4 Remediation of Contaminated Land	Consistent	<p>The existing uses of the site include residential development which are unlikely to result in contamination of the land.</p> <p>The planning proposal is consistent with the aims and provisions of this SEPP.</p> <p>In any case, future redevelopment of the site will need to address the requirements of the SEPP. The proposal is consistent with the provision of this SEPP.</p>
4.5 Acid Sulfate Soils	Consistent	The site is potentially impacted by acid sulfate soil classes 2 and 5. However, the proposal additional use will be located within the existing Mortdale Plaza ensuring that there is no ground disturbance or construction of new building or parking areas.
4.6 Mine Subsidence and Unstable Land	N/A	Not relevant to the subject planning proposal.
Focus Area 5: Transport and Infrastructure		
5.1 Integrating Land Use and Transport	Consistent	The planning proposal is consistent with the direction. The subject site is well serviced by transport infrastructure. It is within walking distance to homes and jobs, in addition to having good vehicle access and also access by buses.
5.2 Reserving Land for Public Purposes	N/A	The planning proposal does not seek to change the current zoning provisions and therefore does not impact on land reserved for public purposes
5.3 Development Near Regulated Airports and Defence Airfields	N/A	The land is not within the vicinity of an aerodrome.
5.4 Shooting Ranges	N/A	The land is not within the vicinity of a shooting range.
Focus Area 6: Housing		
6.1 Residential Zones	N/A	Not applicable.
6.2 Caravan Parks and Manufactured Home Estates	N/A	Not applicable.
Focus Area 7: Industry and Employment		
7.1 Employment zones	Justifiably inconsistent	The planning proposal does not seek to amend the existing zoning of the site. Rather it seeks to include a medical centre within the existing Schedule 1, Item 5 which already facilitates retail

premises and centre based child care facilities on the subject site, in addition to other uses permitted by the zoning.

The Planning Proposal achieves the overall intent of the Plan and seeks to implement the achievement of its vision, land use strategy, policies, outcomes or actions. The proposal is consistent with this Direction as it:

1. Retains the existing area of industrial land;
2. Preserves the availability of existing industrial land supply;
3. Enable a medical centre to collocate within an existing shopping centre that services the neighbourhood and employment area.
4. Improves the diverse employment uses on the site, creating more local jobs and potential for living and working local.

An economic report has been prepared by MacroPlan and is submitted with this planning proposal and confirms that a medical centre is desirable in the locality to address a shortfall in provision.

7.2 Reduction in non-hosted short-term rental accommodation period	N/A	Not relevant to the subject planning proposal.
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	N/A	Not relevant to the subject planning proposal.
Focus Area 8: Resources and Energy	N/A	Not relevant to the subject planning proposal.
Focus Area 9: Primary Production	N/A	Not relevant to the subject planning proposal.

SECTION C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected because of the proposal?

This Planning Proposal relates to an additional use only and will not lead to any uplift in development potential over the site. It is notable that the proposed medical centre will be within the existing Mortdale Plaza development which has already been constructed and operating for a number of years. It accordingly will have no negative impact on critical habitat or threatened species, populations, or communities.

9. Are there any other likely environmental effects of the planning proposal and how are they proposed to be managed?

There is no additional development uplift on the site as a result of this Planning Proposal. The existing approval contains the necessary parking spaces and floor area to comfortably accommodate the medical centre, with no impacts on the site, or external to the site or to the natural environment.

Transport and Parking

Varga Traffic Planning Pty Ltd have provided a detailed assessment of the traffic and parking implications of the Planning Proposal. Based on the analysis within the transport and parking report, the following conclusions were made:

- *the planning proposal seeks approval to include a medical centre as an additional permitted use on the subject site, resulting in the potential for the fitout of the existing level 2 tenancy for a medical centre*
- *analysis based on the traffic generation rates published by TfNSW indicates that the proposed development will result in a nett increase in the traffic generation potential of the site of approximately 41 vph when compared with the previously approved uses on the site*
- *the SIDRA capacity analysis of the public road intersections in the vicinity of the site indicates that:*
 - o *the projected “additional” traffic flows expected to be generated by the planning proposal (i.e. assuming that the site is currently vacant) indicates that there will be no change in current Levels of Service to any of the intersections located around the perimeter of the site, and*
 - o *no road improvements or intersection upgrades would be required as a consequence of the planning proposal*

- the future car parking facilities will be provided in accordance with Council's requirements and the relevant Australian Standards
- the future vehicular access arrangements will be via the existing vehicular access driveway in Roberts Avenue with no changes proposed.
- It is therefore reasonable to conclude that the planning proposal will not have any unacceptable implications in terms of road network capacity or off-street parking/access requirements

With specific reference to car parking requirements, the transport and parking assessment notes that under DCP 2021 if the centre was approved today, it would require a total of 345 parking spaces, some 77 spaces less than the provided capacity of 422 parking spaces.

Georges River DCP 2021 – PARKING REQUIREMENTS		
Parking Provisions	REQUIRED	
	Supermarket/Pharmacy (4,248m²):	212.4 spaces
	Café (23m²):	0.8 spaces
	Ground Floor Sub-Total:	213.2 spaces
	Gymnasium (1,817m²):	81.8 spaces
	First Floor Sub-Total:	81.8 spaces
	Retail (238m²):	5.9 spaces
	Childcare Centre (94 children & 16 staff):	23.7 spaces
	Medical Centre (600m²):	20.0 spaces
	Sub-Total:	49.6 spaces
TOTAL:	344.6 spaces	

The above accordingly confirms that there is adequate parking provided on-site for all uses, including the medical centre use within this Planning Proposal.

Noting the purpose built nature of the centre, along with the adequate supply of parking and site access, including a medical centre as an additional permitted use will have no environmental impacts.

10. Has the planning proposal adequately addressed any social and economic effects?

The social and economic effects of the Planning Proposal are most appropriately described in the context of the challenges associated with a growing population as described in the State Government document the Metropolis of Three Cities.

Among other things, the Plan explains that to meet the needs of a larger population and to maintain economic growth, urban renewal in combination with infrastructure delivery should occur in strategic urban centres. Whilst not a zoned centre, the subject site has consistently been recognised as a type of centre by the former Hurstville Council and now Georges River Council.

The proposed development is considered to generate the following positive social and economic effects:

- Contributes to the retention of an important local shopping centre by ensuring it remains economically viable by including an additional land use needed by the local community
- Contributes to more local jobs for health care workers within the LGA, enabling people to work close to home.
- Addresses a shortfall within the population catchment of medical centres, thereby providing a use that meets the needs of the community.
- Enhances the liveability and vibrancy of the Mortdale area.
- Retains the area of existing industrial zoned land.
- Protects the amenity of residential areas by co-locating employment uses within an existing centre.
- Provides a medical centre within a highly accessible location by walking and cycling, reducing the need for multiple trips.

Employment outcomes

MacroPlan have identified the following employment outcomes as a result of this Planning Proposal to include a medical centre as an additional permitted use:

The proposed Medical Centre will support an increased level of employment both directly onsite and indirectly in the wider economy.

Using industry employment densities and our own view of appropriate benchmarks, an employment density of 31.7 sq.m per worker is estimated for a Medical Centre provision at the subject site, suggesting the proposed 600 sq.m can support 19 Full Time Equivalent (FTE) jobs. With regard to the undersupply of GP's in the catchment, the planned scale of development and employment density outcome, we believe that there is support for 3 – 6 GP's at the subject site.

The direct operational employment will also flow through to indirect employment elsewhere in the local economy that supports onsite employment. The ABS I-O

simple employment multipliers indicate that every 1 direct health/medical FTE job will generate another 0.2 indirect supporting FTE jobs (production induced) elsewhere in the economy, including professional, scientific and technical services, transport, postal and warehousing, rental, hiring and real estate services, administrative and support services, manufacturing, and other industries. Using this benchmark, an estimated 4 additional jobs could be created elsewhere in the local economy.

Table 5 summarises the above medical centre job projections, and those of the current Mortdale Plaza retail and supporting non-retail uses, assuming typical vacancy rates seen in comparable centres. There is estimated to be 176 FTE jobs in the current centre, with an increase to 195 jobs (+11%) including the proposed medical centre.

Table 5 Mortdale Plaza - estimated employment, retail and supporting non-retail uses*			
	GLA	Emp. density**	Onsite jobs
Woolworths	4,170	30	139
Total retail specialties	435	20	22
Crunch Fitness	1,000	67	15
Total current	5,605		176
Medical Centre (p)	600	32	19
Childcare centre (p)	1,280		16
Total proposed	7,485		211

* excludes tenancies estimated as vacant, FTE jobs
 ** sq.m per worker
 Source: ABS, Macroplan

Summary

The key conclusions drawn from this analysis are as follows:

- There is an undersupply of Medical Centres and General Practitioners within the catchment.
- 19 FTE jobs could be created by a Medical Centre development at the subject site, an increase of 11% over the current centre estimate of retail and supporting non-retail jobs.
- 2 - 5 General Practitioners could be supported.
- 4 additional jobs could be created in the local economy.

The Planning Proposal therefore provides substantial economic benefits to the local community. Refer to attached economic needs assessment for further details.

SECTION D – INFRASTRUCTURE (LOCAL, STATE AND COMMONWEALTH)

11. Is there adequate public infrastructure for the planning proposal?

The site is occupied by the Mortdale Plaza Shopping centre, with the proposed additional medical centre use contained within this building. As there is no additional development uplift on the site, no additional demand on public infrastructure is anticipated.

SECTION E –STATE AND COMMONWEALTH INTERESTS

12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

Consultation with public authorities and agencies will occur in a manner consistent with the Gateway Determination.

PART 4 – MAPS

No maps are required with this planning proposal seeking to update Schedule 1, Item 5 of GRLEP 2021 only.

PART 5 – COMMUNITY CONSULTATION

Community consultation will be undertaken in accordance with the requirements prescribed by the Gateway Determination. Whilst the planning proposal should fit within the Basic category, we understand that it is more likely to be considered as a 'standard' planning proposal, with a maximum public exhibition period of 20 days.

Given the planning proposal is a minor change and relates to only an additional permitted use as a medical centre, we suggest that a 14 day notification period is appropriate. This balances partway between the basic and standard categories and better reflects the nature of this proposal.

PART 6 – PROJECT TIMELINE

The Gateway Determination will identify when the planning proposal is to be submitted back to the DPE for finalisation.

An indicative timeline for the planning proposal includes:

Milestone	Timeframe
Consideration by council	July 2024
Council decision	August 2024
Gateway determination	November 2024
Pre-exhibition	November 2024
Commencement and completion of public exhibition period	December 2024
Consideration of submissions	January 2025
Post-exhibition review and additional studies	February 2025
Submission to the Department for finalisation (where applicable)	February 2025
Gazettal of LEP amendment	March 2025

CONCLUSION

This Planning Proposal explains the intended effect of and provides a justification for a proposed amendment to the *Georges River Local Environmental Plan 2021*. The Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* and the Department of Planning and Environment's document *Local Environmental Plan Making Guideline* (August 2023).

This Planning Proposal proposes to amend the existing site specific provisions at 84D Roberts Avenue, Mortdale to include a medical centre as an additional permitted use. There are no other changes proposed in the Planning Proposal to the LEP, nor are there any required amendments to the DCP. It is considered that the LEP amendment sought by the planning proposal will allow for the consolidation of economic activity within a planned centre, first approved by the former Hurstville Council in 2009.

The Planning Proposal has identified significant benefits for both the local residents and workers within the precinct. Importantly:

- The proposal is consistent with state and local government strategic planning initiatives, recognising the need for local employment options that support the 15 minute and 30 minute city ideal.
- Including a medical centre on the site will allow it to operate in a similar manner to other shopping centres, ensuring the long term viability and protection of employment generating activities
- The proposal increases accessibility to important health infrastructure within an accessible location, reducing the need to drive elsewhere.
- Local jobs for health workers are provided, enabling people to work close to where they live, improving lifestyle and overall wellbeing.
- Provides a much needed land use within the area, addressing an shortfall within this part of the Georges River Council area.
- The vibrancy of the centre will increase, enhancing its local character and desirability for residents and nearby workers to visit.
- Existing areas of industrial zoned employment land is retained.
- There is no change to built form.

- There is no significant change in land use, with a medical centre complementary to the retail and service opportunities already available within the Mortdale Plaza.
- The proposal will not have any adverse impact on adjoining properties, public domain, or the natural environment.

The planning proposal is considered to have strong merit based on a sound analysis of relevant planning considerations and is submitted to Georges River Council for consideration, endorsement and forwarding the DPE for a Gateway Determination.