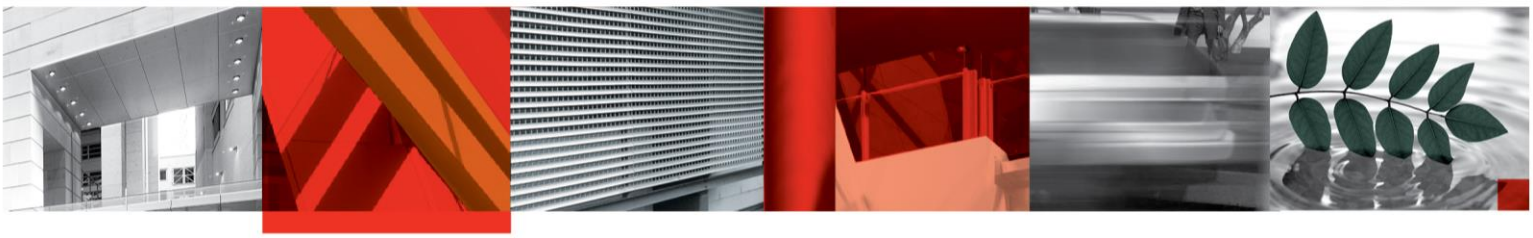
Planning Proposal

For Public Exhibition



2-6 Pilgrim Avenue, 9 Albert Road & 11-13 Albert Road, Strathfield

Amendments to Building Height and Floor Space Ratio

Submitted to Department of Planning and Environment via Strathfield Council
On Behalf of Convertia Pty Ltd

February 2018 ■ 14474

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JBA operates under a Quality Management System that operates in accordance with ISO 9001:2008. This report has been prepared and reviewed in accordance with that system. If the report is not signed below, it is a preliminary draft.

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1.0 Introduction

This report has been prepared by JBA on behalf of Convertia Pty Ltd in relation to land at 2-6 Pilgrim Avenue, 11-13 Albert Road and 9 Albert Road, Strathfield (the site).

The purpose of the Planning Report is to document and integrate the environmental analysis undertaken in support of the rezoning proposal and summarise the proposed approach to development. Specifically, the Planning Report demonstrates how the planning proposal responds to the requirements of section 55 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Report has been drafted in accordance with the guidelines prepared by the Department of Planning dated October 2012 entitled "A guide to preparing Planning Proposals" and the subsequent publication titled "A guide to preparing local environmental plans" (April 2013).

This Planning Proposal addresses the following specific matters:

- Objectives and intended outcomes of the Planning Proposal;
- Explanation of the proposed provisions;
- Justification of the proposal, specifically;
  - Need for the Planning Proposal;
  - Relationship to strategic planning framework;
  - Environmental, social and economic impact;
  - State and Commonwealth interests; and
- Community consultation.

The site is located within the Strathfield Council Local Government Area (LGA) and is therefore subject to the Strathfield Local Environmental Plan 2012 (Strathfield LEP). The current height and floor space ratio (FSR) planning controls under the Strathfield LEP are considered to unnecessarily restrict the ability for the site to realise its full development potential, taking into consideration the site's size and dimensions, its local context, the planning controls for surrounding sites and the opportunity presented by the site to deliver new high-quality housing in a timely manner and in a strategic location close to transport services and amenities.

This planning proposal describes the site, outlines the proposed changes to Strathfield LEP and provides an environmental assessment of the proposal. The report should be read in conjunction with the indicative scheme prepared by Kennedy Associates Architects at **Appendix A** and supporting technical reports appended to this Planning Proposal.

1.1 Pre-Gateway Review

A Pre-Gateway Review was requested by the proponent in April 2016. The Department of Planning and Environment (DP&E) conducted an assessment and proceeded to forward the Planning Proposal on to the Joint Regional Planning Panel (JRPP) for determination. The JRPP determined on 18 October 2016 that the Proposal can proceed to Gateway, subject to the below changes and additional information being provided (**Appendix D**):

- The extension of the proposal across the whole street block, including the service station site;
- The permissible FSR over the whole street block being 5:1;
- The maximum permissible height being 54m;

- A Development Control Plan (DCP) being prepared showing the proposed distribution of height, with that part adjoining the residential area having the lowest height and the part closest to the railway station the highest;
- A traffic study be prepared that applies to the whole street block and includes any public commuter parking provided; and
- Land contamination and hydraulic studies are to be left to the development application stage.

1.2 Gateway Determination

A Gateway Determination for this Planning Proposal was received on 6 November 2017 from the DP&E. The Determination identified a number of updates required to the Planning Proposal, which have been addressed in this report.

Table 1 – Gateway Determination Conditions

Condition	Where in this report?
(a) provide a project timeline, outlining the anticipated timeframes for the plan making process;	Section 1.2.1
(b) reference and address all relevant priorities and actions in the draft Greater Sydney Region Plan;	Section 7.1.2
(c) reference and address all relevant priorities and actions outlined in the draft Eastern City District Plan;	Section 7.1.2
(d) provide updated overshadowing diagrams to state the correct date of the analysis (being the winter solstice at 21 June) and also show the overshadowing impacts of the existing built form;	Appendix A
(e) provide updated analysis of solar access and cross ventilation to the indicative design for the existing service station site at 9 Albert Road;	Appendix A
(f) address and justify the inconsistency with Section 117 Direction 4.1 Acid Sulphate Soils as the subject site is identified as being on Class 5 land in the Strathfield LEP 2012;	Section 7.2.3 and Appendix I
(g) address and justify the· inconsistency with Section 117 Direction 4.3 Flood Prone Land. In this regard, a flood study is to be provided to demonstrate the suitability of the site for redevelopment;	Section 7.2.3, Section 8.3 and Appendix H
(h) provide an updated traffic and transport assessment to address the cumulative effect of traffic generation on the intersection at Raw Square and Everton Road;	Appendix C
(i) provide a preliminary contamination assessment of the extended site to demonstrate the suitability of the site for development;	Appendix I
j) provide an acoustic report to demonstrate the suitability of the site for redevelopment in light of its proximity to the adjacent railway line and road network. The report should also consider the noise impacts of the operation of the existing service station should this use remain whilst the properties at 2-6 Pilgrim Avenue and 11-13 Albert Road are redeveloped;	Appendix E
(k) provide an air quality report to demonstrate the impacts of the existing service station should it not be redeveloped; and	Appendix F
(l) prepare a site specific DCP reflecting the distribution of height across the entire site. This must ensure that the site which adjoins the residential area should have the lowest, while the part which is closest to the station should have the highest.	Appendix J

1.2.1 Timeline for Implementation

It is anticipated that this amended Planning Proposal will be resubmitted to the DP&E for endorsement for public exhibition in March 2018.

Public exhibition is to be for a period of 28 days, with public authorities and other organisations provided 21 days to comment on the proposal, during the public exhibition period. Public exhibition is anticipated to occur between April and May 2018.

The Planning Proposal will be amended as required subject to comments from the public exhibition phase and other agencies and organisations and resubmitted to DP&E for approval and gazettal. This is anticipated to occur in June/July 2018 with the Plan made by the DP&E in August 2018.

Table 2 – Timeline

Description	Date/Timeframe
Commencement Date (date of Gateway Determination)	6 November 2017
Completion of updated Planning Proposal	February 2018
Submission to DP&E for endorsement	March 2018
Public Exhibition	April - mid May 2018
Consideration of submissions	Mid May-June 2018
Timeframe for consideration of a proposal post-exhibition	June 2018
Date of submission to DP&E to finalise the LEP	June/July 2018
Anticipated date for the DP&E to make the Plan	August 2018

2.0 Background

The Sydney metropolitan area is projected to experience significant population growth in the next 10-15 years with an additional 1.6 million people forecast to be living in the region by 2031. Coupled with this anticipated growth will be increased demand on housing, employment, transport, services and facilities. To manage such significant growth, the State Government has released the Plan for Growing Sydney, which sets out a strategic framework to guide and shape Sydney's future development and growth and enable it to realise the NSW Government's vision for Sydney of becoming competitive global city. To achieve this overarching goal of particular importance is the forecast need to deliver some 664,000 new dwellings in the metropolitan area by 2031 to meet the projected population growth. Of this metropolitan wide total, some 130,700 are required in the Eastern City District which includes Strathfield.

The Eastern City District is a highly-urbanised location and therefore to accommodate such significant growth in this area the State Government has made a clear priority to deliver housing through urban renewal, with a particular focus on around key centres and transport hubs. This is reflected within the Plan through Goals 2 and 3 which seek to make Sydney the "city of housing choice, with homes that meet our needs and lifestyles" and "A great place to live with communities that are strong, healthy and well connected."

Underneath these goals the Plan sets out a series of clear 'Directions' and 'Actions' aimed at focusing urban renewal and maximising housing deliver within and around centres and public transport facilities, including:

> ***Accelerate housing supply and local housing choices.*** *(Action 2.1.1)*
>
> ***Undertake urban renewal in transport corridors which are being transformed by investment and around strategic centres.*** *(Action 2.2.2)*
>
> ***Support urban renewal by directing local infrastructure to centres where there is growth.*** *(Action 3.1.1)*

These Actions are supported by the updated draft Eastern City District Plan, which identifies an increased minimum housing target of 157,500 by 2036. Importantly, the draft Plan recognises that Strathfield has a housing target of an additional 3,650 by 2021, with 75% growth in the single-person household group, the largest in the Eastern City District. The draft District Plan confirms that Strathfield Council will monitor and support the delivery of that housing target, while investigating local opportunities to address demand (and diversity) in and around local centres and infill areas. A key focus on transport corridors (such as the adjacent rail corridor passing through the Strathfield Railway Station to the east of the site) and other areas with high accessibility is also to be adhered to by Strathfield Council to successfully meet the necessary housing requirements. The draft Greater Sydney Region Plan also reflects this focus.

The emerging focus on delivering additional housing through transit-oriented development around key transport interchanges, notably railway stations, is clearly seen through the re-development of centres such as Epping, St Leonards, Chatswood, and Hornsby. Interestingly, all these centres (except for Chatswood) which have or are planned to accommodate significant growth and density, all maintained lower passenger movement figures compared to the Strathfield Railway Station (**Table 3**) in 2014.

Strathfield Station provides access to several major rail lines (the T1 North Shore, Northern and Western Line, and T2 Airport, Inner West and South Line) and is served by a nine different Sydney Bus routes that utilise the Railway Station as an

interchange. Furthermore, when compared to other similar town centres, Strathfield is second in 24-hour barrier counts to only Chatswood (**Table 1**). It therefore has more passenger movements in and out than St Leonards, Hornsby and Epping. It is worth considering that these barrier counts only measure movements in and out of the station, and do not take internal train line changes into account. Noting that Strathfield is a key terminal for three key train lines, and a link to a further four, internal passenger movements are likely to be significantly higher than the barrier counts suggest.

Table 3 – Typical 24-Hour Barrier Counts for 2014

Centre Railway Station	Typical 24-hour Barrier Counts (2014)
Chatswood	44,400
Strathfield	**41,420**
St Leonards	35,180
Hornsby	24,500
Epping	21,140

Source: Bureau of Transport Statistics 2014

St Leonards, while not being the juncture of a rail branch line, is a key redevelopment centre identified within the Plan with potential for a future Sydney Rapid Transit station. Accordingly, due to the existing public transport interchange and potential future capability, development is permitted of buildings up to 190m in height. These land use controls are designed to focus high density development in and around the existing train station to maximise public transport accessibility and to achieve the Plan's objective of a well-connected city with people able to live close to jobs, facilities and services.

Chatswood is a major interchange for public transport on the north shore with both the Epping to Chatswood Rail Links via Macquarie University branching off the main North Shore line to Hornsby. This ensures that the Chatswood is clearly identifiable as a major interchange for public transport. Accommodating higher density around the railway station and rail corridor, Chatswood exhibits permissible heights up to 90 metres to capitalise on the availability of transportation. With similar public transport movements to Strathfield, it is reasonable to expect that Strathfield could support densities around the transport interchange of similar scale to Chatswood.

Epping is a key public transport interchange with the Epping Railway Station providing access to the T1 North Shore, Northern and Western Line, and further north to the Central Coast and Newcastle Line. The future North-West Rail Link will also operate trains through the Epping interchange. Subsequently, in line with the State Government's focus on higher density development around key transport hubs, the Epping Urban Activation Precinct was announced in 2013 and permits buildings up to 22 storeys in height. This is assisting the establishment of Epping as a key development precinct with development primarily concentrated around the railway station and corridor.

Similarly, Hornsby exhibits heights of up to 25 storeys, with these heights decreasing as development moves away from the rail corridor. Again, density is centred on the established railway station which is a key public transport interchange that provides access south to the Sydney CBD through Epping and Strathfield, and north to Newcastle.

As is evident from the above, while heights and density slightly differ between the centres, the key similarity between these centres is the focus on higher density development within close proximity to the established railway station and along the rail corridor. Strathfield exhibits very similar characteristics to these centres, with a major transport interchange located adjacent to the town centre, and as

noted Strathfield presently services more commuters so is arguably a larger interchange worthy of greater density.

Overall, Strathfield town centre presents a clear opportunity to maximise housing delivery as it has all the underlying characteristics that support the delivery of high density transit-oriented development consistent with other centres within Metropolitan Sydney. Delivering such an outcome for Strathfield town centre would contribute significantly to realising the vision set out in A Plan for Growing Sydney as it would maximise the use of the existing public transport network and provide homes closer to jobs, services and facilities.

2.1 Strathfield Residential Land Use Study

The Strathfield Residential Land Use Study, prepared for Strathfield Council in 2011, identifies areas where residential growth is to occur, and where the character of existing neighbourhoods is to be maintained, while assisting Council to accommodate 8,300 new dwellings over the next 25 years.

The Study forecast in 2011 that by 2031 the population of Strathfield was expected to increase to 47,100. Subsequent to this in 2013 the Department of Planning and Infrastructure released updated population forecasts which identified the Strathfield Local Government Area (LGA) as having a 2011 population of 37,150, with this expected to grow by 52.2% to 56,550 persons by 2031.

Population projections for Strathfield between 2011 and 2013 have therefore risen by 9,450 persons, which represent a significant proportion of the total population of the LGA. The increased population forecast by the then Department of Planning and Infrastructure signifies an even greater need to deliver additional housing in the LGA that is above and beyond that which has already been planned for by Strathfield Council.

In seeking to develop a strategy for housing delivery, the Strathfield Residential Land Use Study recognised that the majority of existing residential capacity in the LGA is located around the Parramatta Road and rail corridors.

The Strathfield Town Centre precinct was identified by the study as having a maximum capacity (under the 2011 planning controls) for an additional 247 dwellings with the wider LGA identified as having capacity to provide a likely dwelling yield (again, under 2011 planning controls) of around 4,900 dwellings. Achieving the maximum growth available under the 2011 controls assumes that all the sites with spare capacity or potential for residential would be delivered prior to 2031, which is unlikely to occur and even if it were possible, would still result in significantly less housing than that required to meet forecast population growth under A Plan for Growing Sydney.

The Residential Land Use Study was therefore tasked with identifying further residential capacity in 2011. Following a review of the LGA additional capacity for the Strathfield Town Centre was calculated in the Study to be 410, an increase of 225 dwellings. Across the LGA as a whole, the Study identified a total of 6,294 dwellings for new residential development, still 2,006 dwellings less than the 8,300 required.

Amongst other things the Study concludes that increased residential capacity could be achieved through the intensification of the land bound by Elva Street to the west and Raw Square to the east, which includes the subject site. The use of this land for residential development would result in a theoretical likely yield of 595 dwellings assuming a 75% efficiency rate.

Whilst increased density in this location is clearly the appropriate conclusion, we note that when compared to similar transport interchange hubs, such as

Chatswood, Epping and St Leonards, the densities suggested in the Residential Land Use Study appear to represent a significant underutilisation of the lands potential for residential development, particularly due to its immediate proximity to the Strathfield Railway Station transport interchange.

In particular, we note that the study recommends a floor space ratio of 3.5:1 and building height of 35m for the subject site. Again, when likened to comparable centres serviced by major railway stations, the recommended controls appear to represent a significant underutilisation of the sites potential to accommodate residential development, particularly given recent population and housing projections.

Given the recent release of dwelling targets under A Plan for Growing Sydney, and the likely further increase of these targets following the release of the Sub-Regional Strategies, it is evident that the existing planning controls and dwelling projections for the Strathfield Town Centre will need be revised upwards. Particularly as the town centre and its surrounds is logically the most appropriate location to accommodate further growth, as this will maximise the use of existing and future public transport, services and facilities, and will minimise the need to deliver additional housing in less sustainable car dependent locations.

2.2 Key Redevelopment Precincts

A number of key redevelopment precincts in the Strathfield area are responding to the need for higher density development along the established rail corridor in accordance with A Plan for Growing Sydney, including the Columbia Precinct and the Strathfield Triangle (within the Canada Bay Council LGA). These are located to the north of the subject site as identified **Figure 1**.The Strathfield Town Centre that falls within the Strathfield LGA is situated to the south-east of the subject site in closer proximity to the railway station. Subsequently, the subject site forms a key connection between all three precincts (**Figure 2**) and will make a key contribution to the form and character of development along the rail corridor.

Figure 1 – Key redevelopment precincts
Source: NearMap

The Strathfield Town Centre, Strathfield Triangle and the Columbia Precinct all provide higher residential tower development than the surrounding area, focused around the established rail corridor, Homebush Railway Station and Strathfield Railway Station. This provides a consistent built form through the area around the intersection of the T1 North Shore, Northern and Western Line and the T2 Airport, Inner West and South Line rail lines, all of which merge at the key interchange provided by the Strathfield Railway Station. The subject site is positioned at the pivot point between these three precincts and transport connections (**Figure 2**), thus providing the ideal opportunity to deliver built form that reflects its central status.

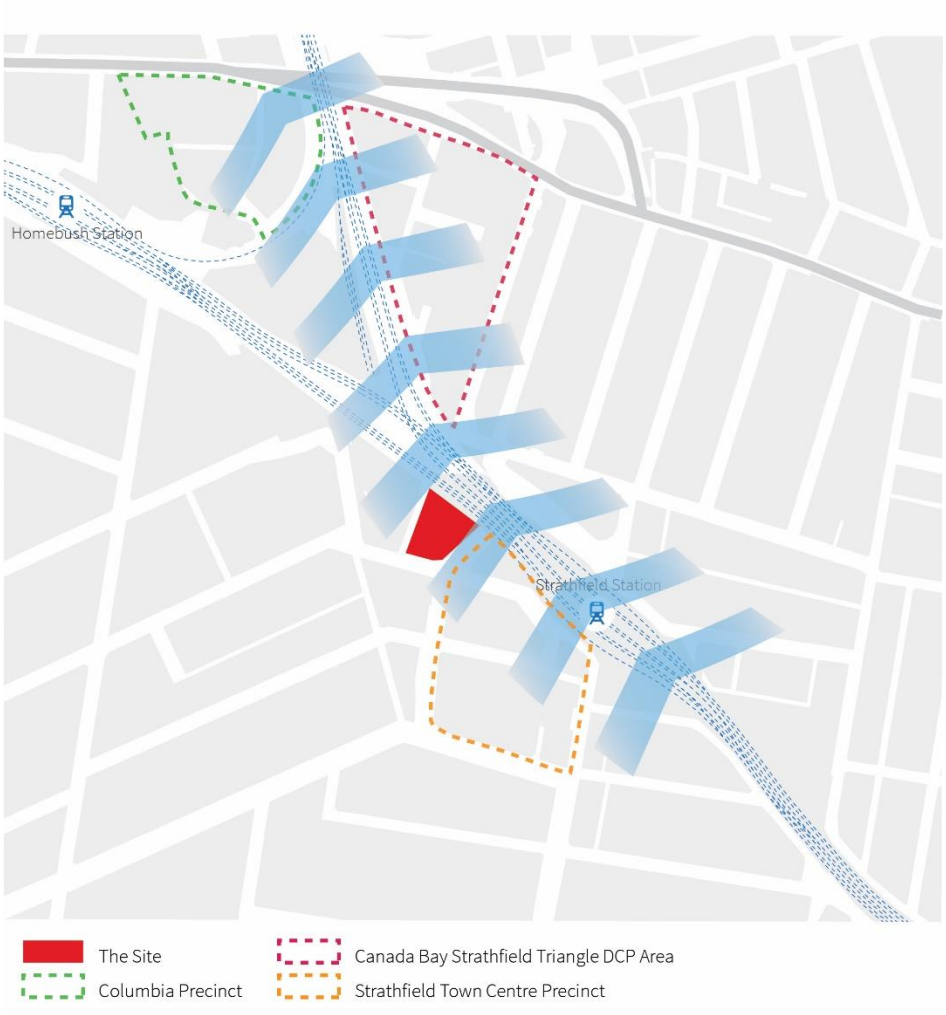

Figure 2 – The site is located at the pivot point of the establish development corridor

2.2.1 Strathfield Triangle Development Control Plan

As identified earlier, the LGA of Canada Bay Council (CBC) is located to the north of the rail corridor with development in that area clearly visible from the Strathfield Town Centre. This area is known as the Strathfield Triangle and is approximately 150m north of the subject site and 250m north of the Strathfield Town Centre (**Figure 3**). Subsequently, CBC have prepared an area specific Development Control Plan (DCP) for the area which guides development in the precinct.

Figure 3 – The Strathfield Triangle is situated directly north of the site
Source: NearMap

Notably, the DCP recognises the precincts' convenient location to the Strathfield Railway Station and the Strathfield Town Centre and seeks to encourage development of a compatible mix of retail and residential development. It makes mention of the fact that the site is surrounded by major transport corridors which create barriers to its integration with the urban fabric of Strathfield, however that its proximity to the Strathfield Railway Station underpins the precincts potential for urban renewal and higher density built form.

To accommodate this urban renewal, the DCP provides building heights across the precinct varying from five storeys in the central-eastern part of the precinct (**Figure 4**), to 18 storeys in the southern-most point of the triangle (adjacent to the rail

corridor). The DCP identifies the need for the tallest buildings to address the widest spaces along the rail corridor (particularly where the rail lines branch out), to create a strong urban edge and act as an acoustic and visual buffer for land behind.

The built form controls set out in the DCP; particularly the building heights confirm the clear vision of CBC to establish a clear town centre location through more intense forms of development to the south of the precinct nearest to the Strathfield Town Centre and the railway station. It is noted that subject site is better positioned to the town centre or the railway station than all the land within the Strathfield Triangle Precinct.

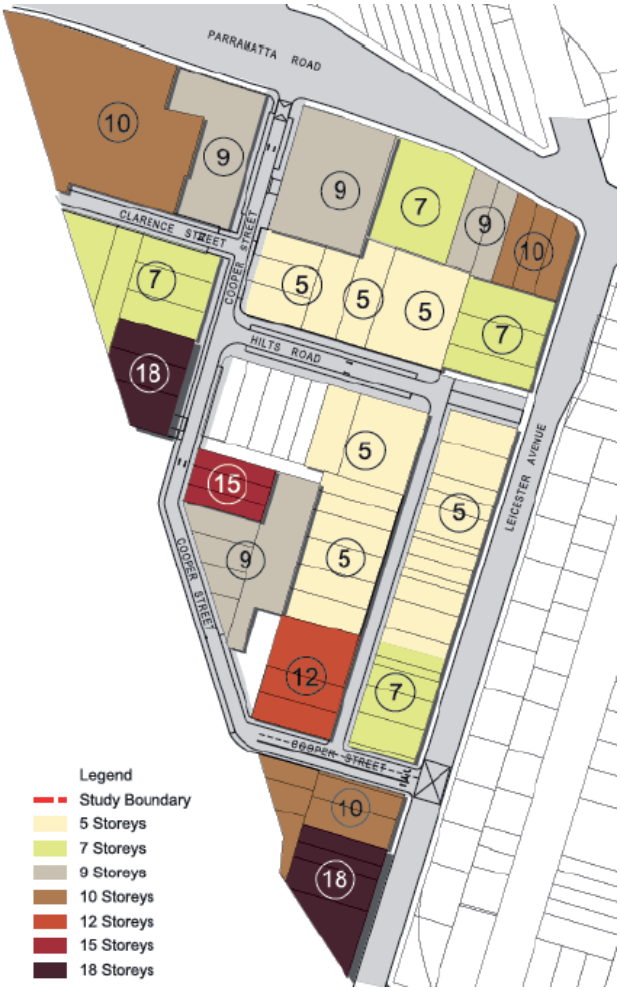

Figure 4 – Strathfield Triangle building heights from the CB Council DCP
Source: Canada Bay Council, Clouston Associates

2.2.2 Columbia Precinct

The Columbia Precinct is a Part 3A Major Project determined by the Department of Planning and Environment in 2013. The concept plan for the precinct proposed to redevelop the existing industrial area to a mixed-use development, involving a mix of commercial, residential and recreational spaces. The precinct sits to the west of the Strathfield Triangle, approximately 600m to the north-west of the subject site, and covers an area of just under 30,000m^2.

The concept plan was approved for a proposed mix of uses with over 60,000m^2 of residential, across several buildings. These buildings included seven residential towers above podiums, with heights ranging between six and 21 storeys. These

buildings transitioned from the lower heights in the north-west, to the taller buildings closest to the rail corridor in the south-west, which is consistent with the Strathfield Triangle DCP as described above, by presenting higher development to the rail network to act as an acoustic and visual buffer.

2.2.3 Strathfield Town Centre

The subject site is situated to the north-west of the Strathfield Town Centre, which is adjacent to a key interchange on the Sydney Trains rail network, the Strathfield Railway Station. Strathfield town centre is unique in that it is influenced by the planning visions of three Councils – Strathfield, Canada Bay and Burwood – due to the suburb falling across LGA boundaries. The subject site is located in the Strathfield LGA and is therefore falls under the planning controls imposed by the Strathfield LEP.

Strathfield Town Centre Master Plan Project

The Strathfield Town Centre Master Plan, prepared and exhibited in 2008 by Strathfield Council, affects land bound by the railway corridor to the north, Raw Square to the west, Redmyre Road to the south and The Boulevarde to the east. While the subject site is not located within this area (**Figure 5**), the Master Plan identifies it as a 'key site' for future higher density development of a residential and mixed-use nature.

The primary purpose of the Master Plan was to apply planning controls designed to deliver and reinforce the town centre's status as the key focal point of the Strathfield LGA, which inevitably necessitate the centre to having the most intense forms of development.

Figure 5 – The site is situated to the immediate west of the Strathfield Town Centre
Source: NearMap

The town centre is zoned B3 Commercial Core to reflect the precincts standing within the urban hierarchy, which focuses the centre around its public transport interchange. The Master Plan also identifies floor space ratios for the town centre of between 4:1 and 7.5:1, with building heights from 11m up to 54m, with parts of the site identified as potentially having 40 storeys. The Master Plan also sets out several key priorities and initiatives for the town centre including:

- redevelopment of the existing Council car park site to an underground Bus Interchange in the east of the precinct with major mixed-use development in two towers above (**Figure 6**);
- the creation of a new town square with active frontages, including restaurants and cafes; and
- Redevelopment of the Strathfield Plaza with an enlarged retail component and two mid-rise towers above (**Figure 7**).

The Master Plan also identifies the subject site as a 'key site' for future higher density residential and mixed-use development. Whilst this is the case it is noted that the current planning controls do not reflect the sites standing as a future higher density site in accordance with the dwelling targets under A Plan for Growing Sydney. Additionally, to maintain consistency with the adjacent Strathfield Triangle and Columbia Precinct, building heights along the rail corridor

should generally be higher than currently allowed for to maximise the use of the public transport network and to provide a visual and acoustic barrier to the rail corridor.

Figure 6 – Strathfield town centre with underground transport interchange
Source: Strathfield Council

Figure 7 – "New LOOK" Strathfield Town Centre
Source: Strathfield Council

2.3 Summary

In summary, it is noted that:

- Significant population growth within the Sydney Metropolitan Area is forecast to drive future housing demand above and beyond that previously anticipated prior to 2014.
- A Plan for Growing Sydney identifies a need for an additional 664,000 dwellings in Metropolitan Sydney by 2031, with some 130,700 of these to be provided in the Central Subregion including Strathfield.

- Given the significant population growth and limited greenfield opportunities, urban renewal and infill development is expected to be pivotal to meeting these dwelling targets.
- The Plan clearly prioritises urban renewal around key centres and transport hubs as this will help deliver a more accessible, connected and sustainable Sydney;
- The draft District Plan identifies Strathfield as needing to provide additional housing in areas near centres with high accessibility along transport corridors;
- Transit oriented development is a key feature of the plan as has already occurred or been planned for in centres such Epping, Chatswood, St Leonards and Hornsby. These key centres focus high density residential development around strategic transport interchanges;
- Strathfield Town Centre exhibits almost identical underlying characteristics to these other key centres given it's standing as a key transport interchange that provides links to the northern, western and eastern suburbs of Metropolitan Sydney.
- The Strathfield Residential Land Use Study, while recognising the need for additional residential growth within the Town Centre area, does not recognise the strategic nature of the Strathfield Railway Station and does not take into account the most recent dwelling and population forecasts. Subsequently, its dwelling targets are somewhat out of date and fall short of the numbers required to satisfy A Plan for growing Sydney. This planning proposal seeks to respond and address that shortfall and in doing so seeks to maximise the opportunity presented by the station and the town centre.
- It is noted that there are three key areas that make up the wider area surrounding Strathfield Station, these being the Columbia Precinct, the Strathfield Triangle and the Strathfield Town Centre. Despite not being as central as the Strathfield Town Centre or the subject site, both the Columbia Precinct and Strathfield Triangle focus high buildings towards the rail corridor to act as visual and acoustic buffers for future residents. The building heights in these areas range from between 18 storeys up to potentially 40 storeys.
- The subject site is situated in close proximity to Strathfield Town Centre, approximately 200m from the railway station and acts as a key link between the town centre, the Columbia Precinct and Strathfield Triangle. The principle of additional height and density in this location is therefore considered to be highly appropriate and development controls should be updated to reflect the clear opportunity provided by the site to deliver significant housing in a sustainable and highly strategic location.
- Delivering additional housing in and around the town centre and railway station will have the added benefit of reducing the need for Strathfield Council to identify other less suitable sites for additional housing to meet the updated dwelling targets.

3.0 The Site

This chapter briefly describes the site. Further detail is provided in the sections describing the different elements of the existing environment.

3.1 Site Location

The proponent's site is located at 2-6 Pilgrim Avenue and 11-13 Albert Road, with the Planning Proposal also including the adjacent site at 9 Albert Road, in Strathfield (**Figure 8**). It is situated close to the boundary of the Strathfield LGA with the LGAs of Canada Bay Council and Burwood Council.

Figure 8 – The subject site is located at the intersection of three local Council areas
Source: Google

The general Strathfield area varies in its style, with a mix of high-rise and low-rise residential development. The Strathfield Railway Station is located approximately 200m to the east of the site, providing fast, direct and reliable access to the north, east and west of the metropolitan Sydney area. The M4 Motorway also begins to the north of the site, heading west to Parramatta, Blacktown and Penrith.

The site itself is located approximately 10kms west of the Sydney Central Business District, and 10kms south-east of Parramatta.

3.2 Site Description

The site comprises six lots as outlined in **Table 4**, and is irregular in shape, with a total area of approximately 4,885m^2. Five of these lots are under the ownership of the proponent with the adjacent lot owned separately. The primary frontage is approximately 60m to Pilgrim Avenue, with secondary frontage to Albert Road provided for the adjacent lot. A site survey prepared by DJ Barrington & Associates is attached at **Appendix B** and provides full details of the lot boundaries, levels and easements.

Table 4 – Lots subject to this planning proposal

Reference	Street address	Legal description	Area
Site A (proponent owned)	2 Pilgrim Avenue	SP8785	500 m^2
Site B (proponent owned)	4 Pilgrim Avenue	Lot 9 DP15917	472 m^2
Site C (proponent owned)	6 Pilgrim Avenue	Lot 8 DP15917	433 m^2
Site D (proponent owned)	13 Albert Road	Lot A DP100558	748 m^2
Site E (proponent owned)	11 Albert Road	Lot B DP100558	715 m^2
Site F	9 Albert Road	Lot 100 DP807807	2,017 m^2

The majority of the site is covered by asphalt and concrete paved areas that are accessed via a single driveway off Albert Road and two driveways off Pilgrim Avenue. Sites A, B and C contain detached single storey brick residential dwellings, with associated landscaping and outbuildings. Sites D and E each contain two storey unit buildings, with a central driveway to a rear at-grade parking area. Site F is currently occupied by a Shell Service Station.

Vegetation is limited to a select number of trees, mainly along Pilgrim Avenue, on the western boundary of the site. Several trees are situated along the western boundary of Site F.

For the purposes of this Planning Proposal, Sites A through E are referred to as Site 1, and Site F (the service station) is referred to as Site 2.

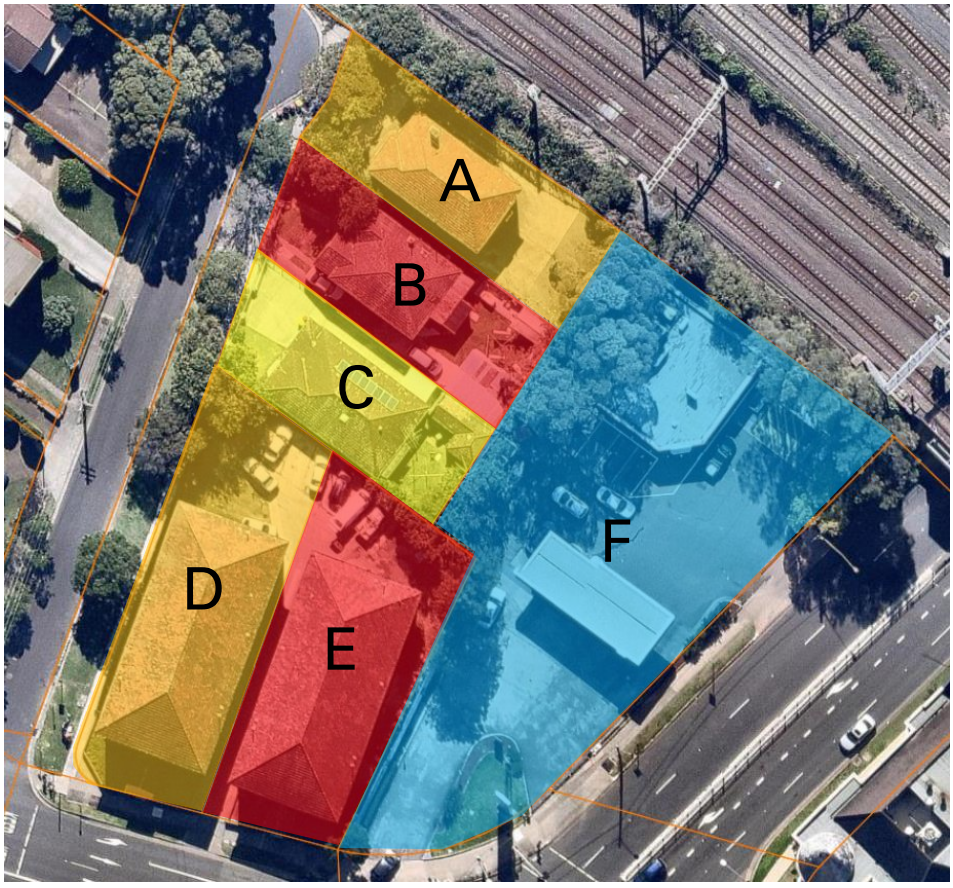

Figure 9 – The subject site contains five separate lots
Source: NearMap

3.3 Surrounding Development

The surrounding locality comprises a mix of land uses. Further to the east of the Shell Service Station is the Sandalwood Apartments residential tower (approximately 18 storeys high) and the Strathfield Railway Station approximately 200m from the site.

As highlighted earlier in this report, the Strathfield Railway Station is a key interchange on the Sydney Trains rail network with a number of key rail services stopping at the station including the T1 North Shore, Northern and Western Line and the T2 Airport, Inner West and South Line provide frequent services from the station into wider Sydney.

Across Albert Road to the immediate south of the site is a mix of single and double storey detached residential dwellings, with a new residential tower development on the corner currently under construction, to be approximately 11 storeys.

The Regal Court mixed use development (approximately 18 storeys high) is located to the site's south-east and comprises a number of smaller ground level retail shops with residential above. Further to the south-east is the Strathfield Plaza shopping complex and a mix of commercial and residential buildings.

West of the site across Pilgrim Avenue are a number of older style 1970's residential flat buildings that vary between two to four storeys in height. The higher residential unit blocks generally front Elva Street, and overlook the rail corridor. Further to the west the height of the residential flat buildings along Elva Street increases to approximately 10 storeys.

The site overlooks the rail corridor to the north. Additional residential areas, within the Canada Bay LGA, are located to the north-east, and generally comprise single storey detached dwellings. A light industrial and warehouse precinct is located approximately 400m to the north-west of the site.

Figure 10 – Site and surrounding context
Source: JBA

3.4 Land Use Capability

Our analysis of the capability of the physical attributes and context of the site to support redevelopment for the purposes of a mix of residential and non-residential uses is summarised in **Table 5**.

Table 5 – Land use capability

Site Attributes	Capability for a medium density mixed residential and commercial redevelopment
Urban and subregional context	The site's urban and subregional context is defined by its location and proximity to the Strathfield Town Centre and Railway Station, which underpin its clear potential for high density residential and mixed-use development. The current and proposed future redevelopment of this area will reinforce Strathfield town centres role as the primary centre in the LGA and will maximise its contributions to the delivery of future housing to meets the forecast population and dwelling growth outlined in A Plan for Growing Sydney.
Surrounding properties	Subject to an appropriate urban design response, the proposed use and density is compatible with the properties and built form that surrounds and adjoins the site, particularly those existing developments in the Strathfield Town Centre and current construction occurring to the south of Albert Road.
Land size and topography	The topography of the site lends itself to achieving a future development outcome as illustrated in the indicative concept plans. The site is of a sufficient size capable of supporting development of a high density and scale which provides a transition from the northern Strathfield Triangle to the Strathfield Town Centre in the east.
Existing vegetation	Minimal vegetation is located on the site at present, with existing vegetation generally being planted as part of residential landscaping. New landscaping and vegetation will be provided as part of any new mixed-use development and will be above and beyond that which presently exists.
Existing buildings and infrastructure	The site contains two double storey unit blocks and three single storey detached dwellings, fronting both Albert Road and Pilgrim Avenue. Existing infrastructure is available to service the future development and further investigations will be undertaken post 'Gateway Determination' to identify if any upgrades are required.
Access and transport	The site currently has direct road access from both Pilgrim Avenue and Albert Road, although the concept plan seeks to relocate road access into the site from Pilgrim Avenue only. Public transport is available in the form of frequent rail services from the nearby Strathfield Railway Station, and bus services (routes 407, 408, 480 and 483) along Albert Road. The surrounding road network is capable of supporting the type of development proposed.
Heritage significance	No items of heritage significance are located on the site. The site is located adjacent to the State Heritage Register listed Strathfield rail under bridges, to the north-east, however future redevelopment of the site is highly unlikely have any adverse impact on this.
Contamination	The site is presently being used for residential purposes, adjacent to a working rail corridor. This proximity to the rail corridor may introduce potential for relatively low level contaminants. Further investigations can be undertaken following the gateway determination if required.
Stormwater and flood risk	Currently there is no prepared flood study for the area however Strathfield Council has recently received funding for a flood study for the Powells Creek and Saleyards Creek. If necessary, flood analysis is able to be prepared following gateway determination or prior to any development application or consent being granted.

3.5 Current Planning Controls

The Strathfield LEP is the primary environmental planning instrument applying to the site. The current planning controls that are applicable to the site are set out below.

Land Use Zoning

The site is zoned B4 Mixed Use under Strathfield LEP 2012. It is not proposed to change the zoning of the land. The current zoning is shown in **Figure 11**.

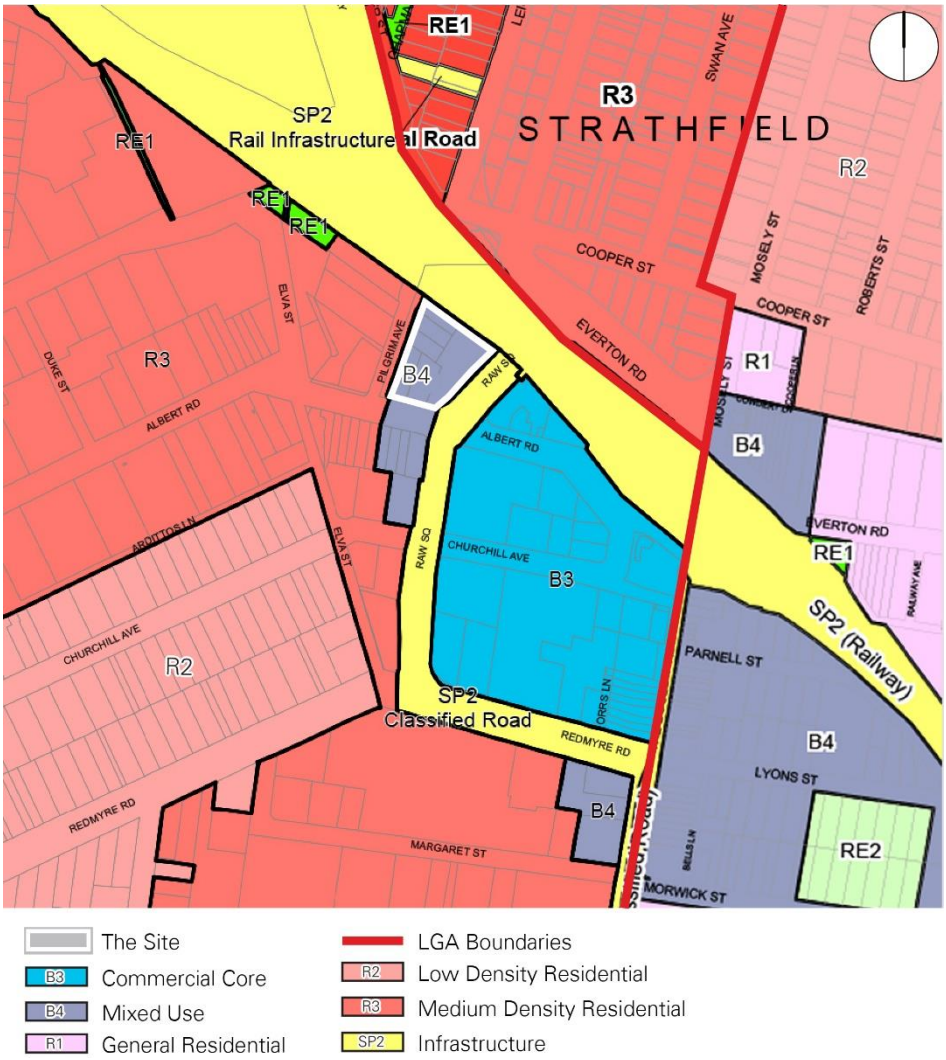

Figure 11 – Strathfield LEP Zoning Map

Building Height

The site has a current height limit of 35m applied under the Strathfield LEP, as shown in **Figure 12**.

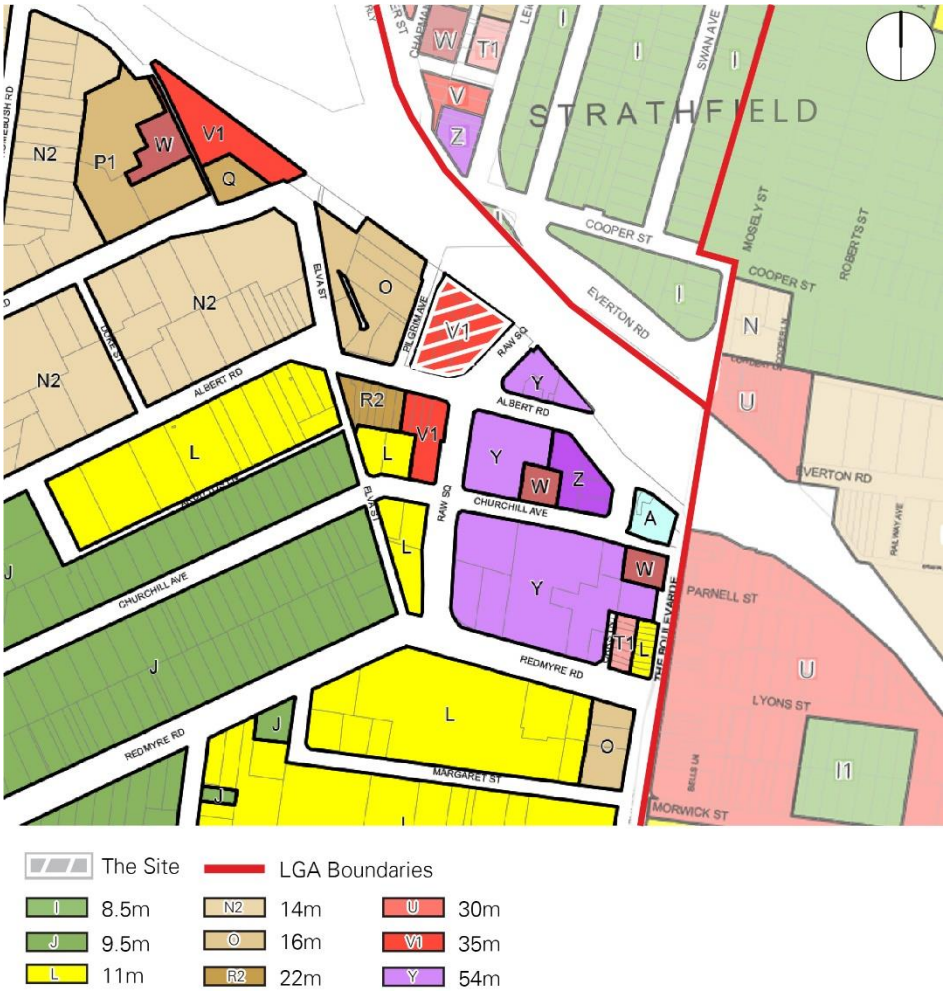

Figure 12 – Strathfield LEP Building Height Map

Floor Space Ratio

The site has a maximum floor space ratio of 3.5:1 applied under the Strathfield LEP, as shown in **Figure 13**.

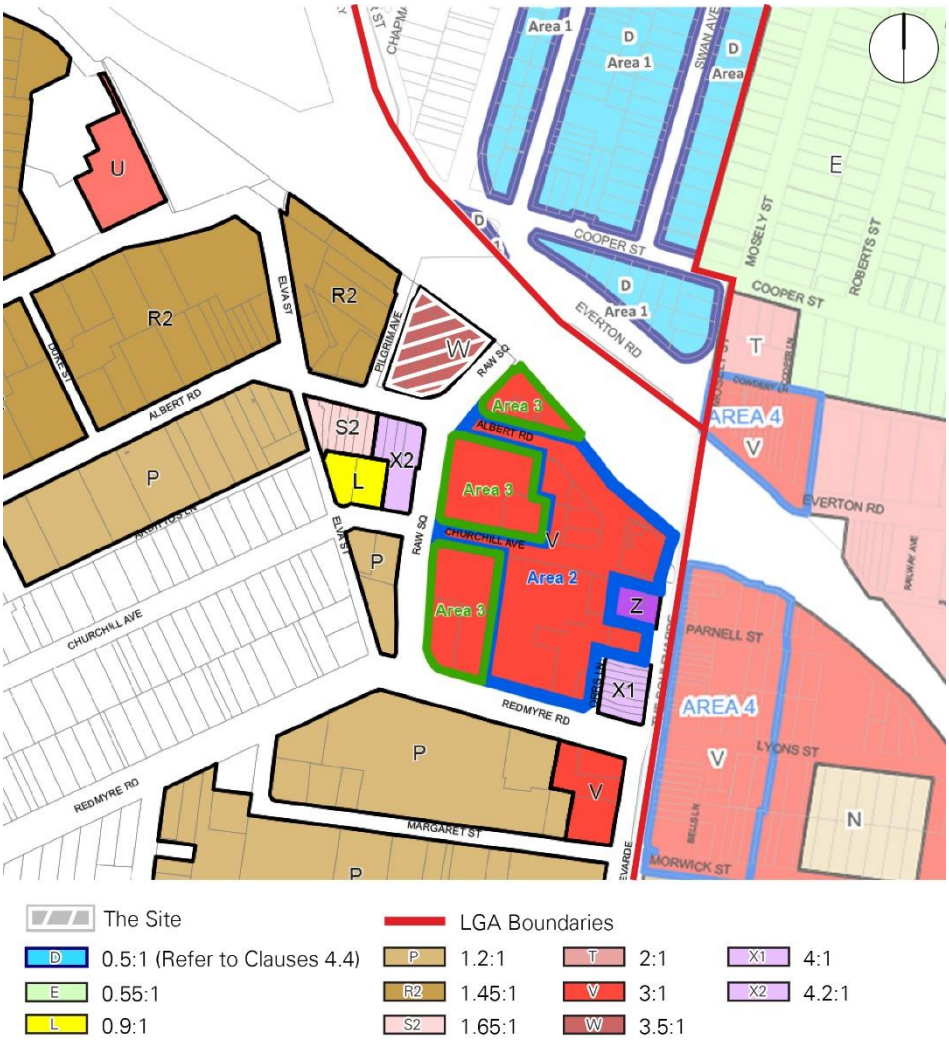

Figure 13 – Strathfield LEP FSR Map

4.0 Indicative Scheme

4.1 Overview

Taking into consideration the site-specific opportunities and constraints including but not limited to its locational attributes, strategic planning policy and the surrounding built form; a number of planning and design principles were established to guide and inform how the site may be redeveloped in the future under the proposed planning controls. Specifically, it was established that any future redevelopment of the site was to:

- Improve the site's frontage and contribution to the Strathfield Town Centre, recognising and responding to the form and character established by the existing tall buildings;
- Contribute to the local housing stock with the provision of a range of dwellings of different sizes;
- Incorporate buildings of varying form and heights that facilitate an appropriate built form outcome that responds to the opportunity presented by the site, whilst minimising overshadowing and view impacts to the west;
- Deliver a high-quality environment for residents in accordance with SEPP 65;
- Be designed to comply with the Apartment Design Guide, particularly with regard to building separation, landscape open space, deep soil planting, solar access, cross ventilation and apartments sizes;
- Deliver a high quality built form and design outcome that complements the desired future modern character of the centre;
- Ensure the future development rights of adjacent sites are not compromised by the proposed development;
- Continue to provide a number of permanent jobs on the site through some ground floor non-residential uses; and
- Ensure minimal adverse environmental and amenity impacts on the existing surrounding buildings.

4.2 Description of Indicative Scheme

Using the above principles, Kennedy Associates Architects have prepared an indicative scheme for the site (**Appendix A** and **Figure 14**) that sets out to achieve the aforementioned objectives and intended outcomes. The indicative scheme demonstrates how the site could be redeveloped in the future under the proposed height and floor space ratio controls, while preserving future development rights on the adjacent service station site. Full details of the indicative scheme are contained in the accompanying Urban Design Report at **Appendix A** however the key components of the scheme include:

- A predominant street wall height of approximately 10 storeys that wraps around the site along all street frontages;
- Building form across the subject site comprising a podium structure with two residential towers of 11 and 15 storeys primarily aligned to the Pilgrim Avenue and Raw Square frontages and act as northern and southern bookends for the site;
- A central lower rise podium level that houses the primary communal open space area characterised by landscaping and recreational pool facilities;
- Ground floor commercial/retail tenancies; and
- Basement level car parking accessed from Pilgrim Avenue and Raw Square.

It is important to note that the indicative scheme represents a single preferred solution for how the site might be redeveloped under the proposed planning controls. It does however not represent the only possible solution to the site's future design which would be subject to detailed analysis to ensure amenity for future residents.

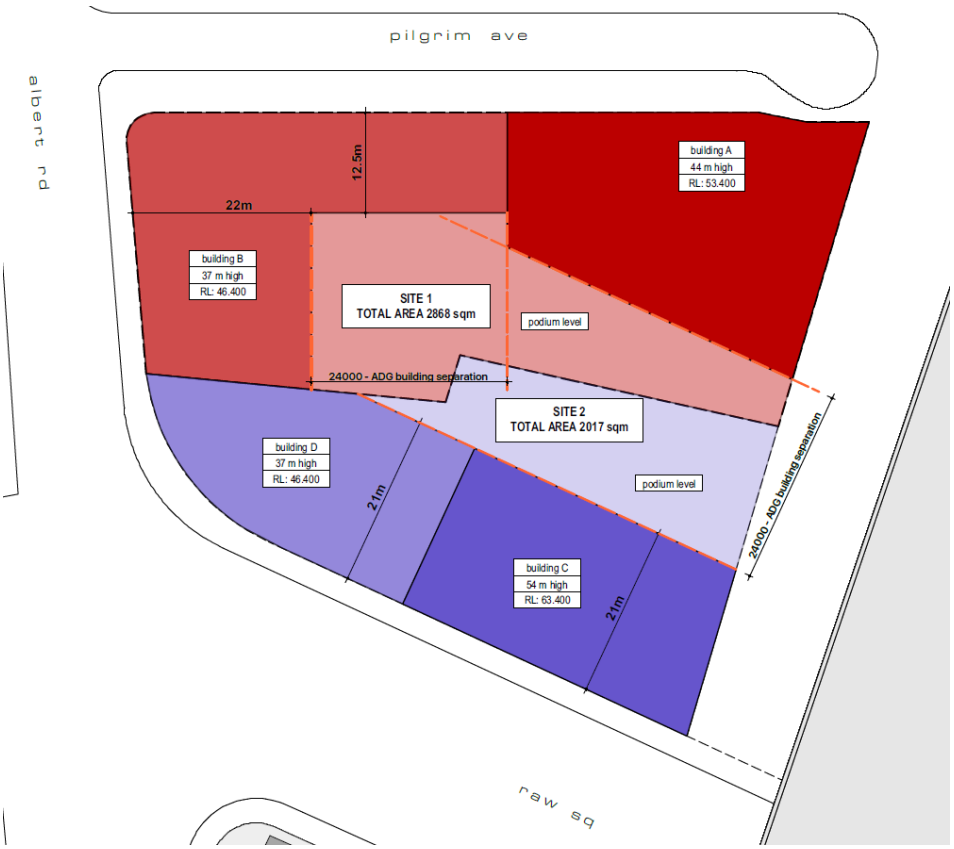

Figure 14 – Indicative layout scheme of the subject site and adjoining site

Indicative Scheme – Key Development Statistics

Key development information is summarised in **Table 6**.

Table 6 – Key development information for the indicative scheme

Component	Detail
Site area	4,885m^2
Gross floor area	24,077m^2
Floor space ratio	4.95:1
Heights	Building A – 12 storeys (44m) Building B – 10 storeys (37m) Building C – 15 storeys (54m) Building D – 10 storeys (37m)
Car spaces	351 spaces on Site 1 and 228 on Site 2.
Residential apartments	280 Site 1: 167 units Site 2: 113 units
Commercial floor space	1,358m^2

Built Form

A key priority for the indicative scheme was to ensure that the built form appropriately responded to the scale and height of the residential buildings to the east of the site, and the recently completed 11 storey development to the south, whilst also ensuring the development rights of the adjacent service station site were maintained.

As shown in **Figure 16** this has been achieved by locating the taller residential building adjacent to the established rail corridor along the Pilgrim Avenue frontage, with heights stepping down towards the Albert Road frontage, respecting the lower storeys to the west and south-west of the site. This proposed height distribution reflects the requirements of the JRPP determination, with a focus on increased height closest to the Strathfield Railway Station, stepping down towards the western residential area.

When developed in conjunction with potential built form on the neighbouring service station site, the development forms a 'U' shape, with the open end towards the rail corridor. This allows for overshadowing to be evenly distributed across dwellings to the south, however ensures that at least 2 hours of sunlight is still obtainable for those properties.

Figure 15 – The proposed height distribution across the site
Source: Kennedy Associates

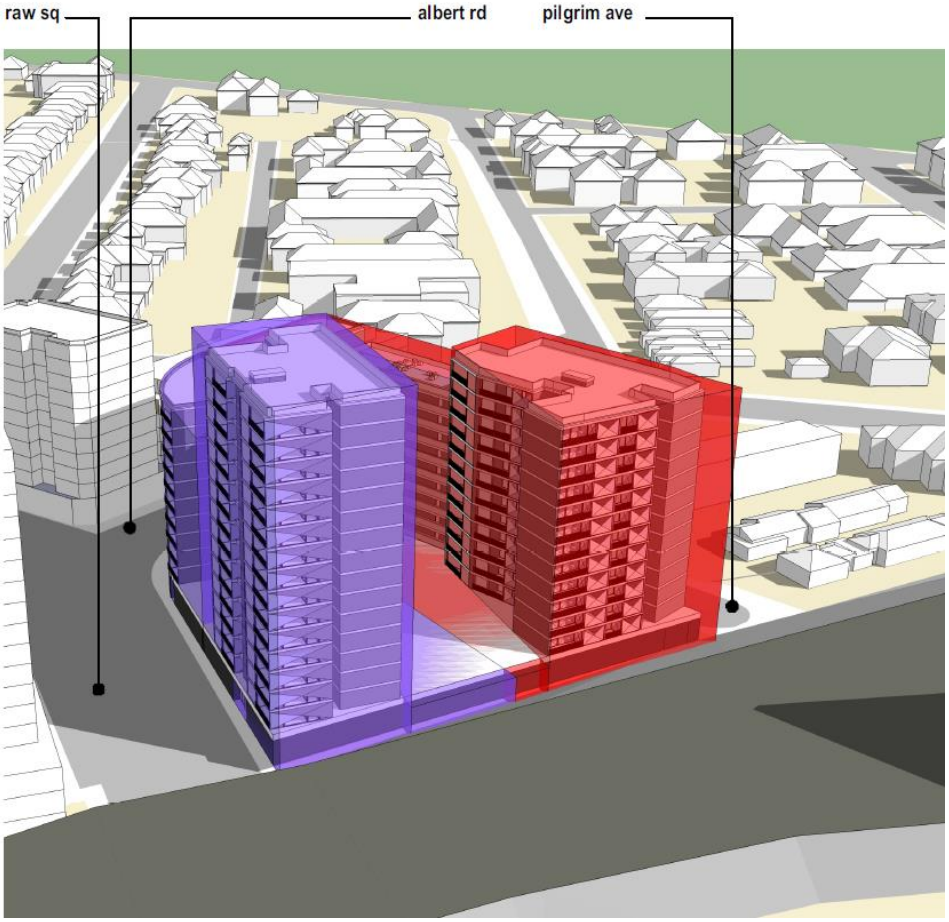

Figure 16 – The height distribution focuses the tallest buildings towards the railway corridor
Source: Kennedy Associates

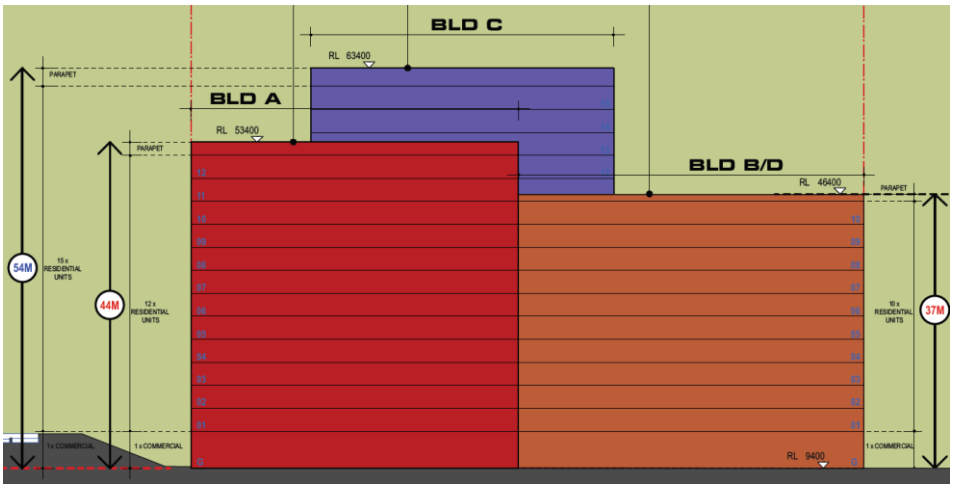

Figure 17 – Elevation showing the proposed relationship of the Indicative scheme
Source: Kennedy Associates

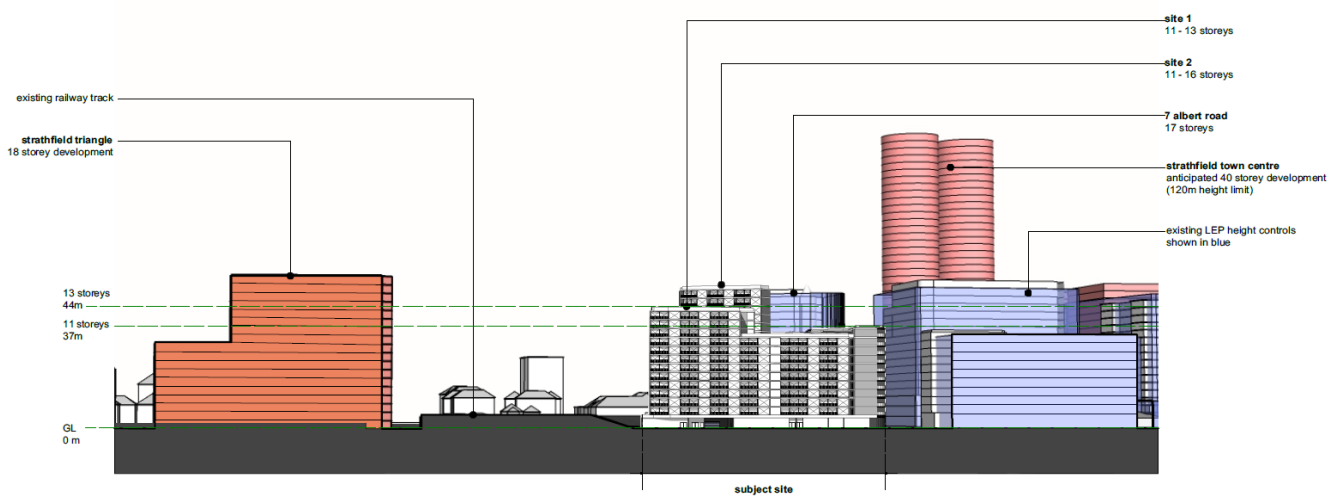

Figure 18 – Perspective showing the proposed relationship of the indicative scheme to the Strathfield Town Centre and Strathfield Triangle
Source: Kennedy Associates

Apartment Design Guide

Table 7 lists the relevant ADG 'Rules of Thumb' and assesses the Indicative schemes consistency with those standards. The assessment demonstrates that the indicative scheme complies with the majority of the 'Rules of Thumb' and that the scheme is capable of providing a high standard of amenity for future residents. Where departures are proposed to the 'Rules of Thumb' they are discussed in further detail below the table.

Table 7 – Assessment against the relevant Design Criteria in the ADG

Design Criteria	Proposal
Part 3 Siting the Development	
3D Communal and Public Open Space	
Objective An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping	✓
Design Criteria Communal open space has a minimum area equal to 25% of the site	✓ Can comply – the area of communal open space will be confirmed during the DA stage.
Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid-winter)	Can comply (during detailed design at the DA stage)
3E Deep Soil Zones	
Objective Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality.	A proportion of the site will be confirmed as deep soil zone during the detailed design phase. Given the sites location in a highly-urbanised town centre environment, it is considered unrealistic for significant areas of deep soil zone.

Design Criteria	Proposal
Design Criteria Deep soil zones are to meet the following minimum requirements: Site Area / Minimum Dimensions / Deep Soil Zone (% of site area) Less than 650m² / - / 7% 650m² – 1,500m² / 3m Greater than 1,500m² / 6m Greater than 1,500m² with significant existing tree cover / 6m	As above, details of deep soil zones will be confirmed during the detailed design stage.
3F Visual Privacy	
Objective Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy.	✓ Appropriate separation between apartments and buildings has been provided.
Design Criteria Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows: Building Height / Habitable rooms and balconies / Non-habitable rooms Up to 12m (4 storeys) / 6m / 3m Up to 25m (5-8 storeys) / 9m / 4.5m Over 25m (9+ storeys) / 12m / 6m	✓
3K Bicycle and Car Parking	
Objective Car Parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas	✓
Design Criteria For development in the following locations: ▪ on sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or ▪ on land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre The minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less. The car parking needs for a development must be provided off street.	✓ There are 351 car spaces provided on Site 1 and 228 on Site 2under the indicative scheme.
Part 4 Designing the Buildings	
4A Solar and Daylight access	
Objective To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space	✓
Design Criteria Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas.	✓ 74.2% for Site 1 and 77% for Site 2
In all other areas, living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9 am and 3 pm at mid winter.	✓ Can comply subject to detailed design
A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid winter.	✓ 10.2% for Site 1 and 15% for Site 2
4B Natural Ventilation	
Objective	✓

Design Criteria	Proposal
The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents	The indicative scheme generally complies, with units being less than 18m in depth. Natural ventilation through units will be achieved during detailed design.
Design Criteria At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed.	✓ 62.5% for Site 1 and 66.6% for Site 2.
Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.	Details will be provided at the DA stage, however the development will comply
4C Ceiling Height	
Objective Ceiling height achieves sufficient natural ventilation and daylight access	✓
Design Criteria Measured from finished floor level to finished ceiling level, minimum ceiling heights are: Minimum ceiling height Habitable rooms: 2.7m Non-habitable: 2.4m For 2 storey apartments: 2.7m for main living area floor; 2.4m for second floor, where its area does not exceed 50% of the apartment area Attic spaces: 1.8m at edge of room with a 30 degree minimum ceiling slope If located in mixed use areas: 3.3m for ground and first floor to promote future flexibility of use These minimums do not preclude higher ceilings if desired.	✓ The development will comply with detail provided at the DA stage.
4D Apartment Size and Layout	
Objective The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity	✓ Apartments have been designed to generally comply with this requirement. Further detail design of the indicative scheme will be carried out prior to a DA being lodged.
Design Criteria Apartments are required to have the following minimum internal areas: Studio: 35m^2 1 bedroom: 50m^2 2 bedroom: 70m^2 3 bedroom: 90m^2 The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m^2 each. A fourth bedroom and further additional bedrooms increase the minimum internal area by 12m^2 each.	✓ Apartment sizes within the indicative scheme comply with the minimum ADG requirements

Design Criteria	Proposal
Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms.	✓
Objective Environmental performance of the apartment is maximised	✓
Design Criteria Habitable room depths are limited to a maximum of 2.5 x the ceiling height.	Apartments have been designed to generally comply with this requirement. Further detail design of the indicative scheme will be carried out prior to a DA being lodged.
In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window.	
Objective Apartment layouts are designed to accommodate a variety of household activities and needs	✓
Design Criteria Master bedrooms have a minimum area of 10m^2 and other bedrooms 9m^2 (excluding wardrobe space).	Bedroom and living space dimensions and areas will be confirmed during detailed design, however the development will comply.
Bedrooms have a minimum dimension of 3m (excluding wardrobe space).	
Living rooms or combined living/dining rooms have a minimum width of: ▪ 3.6m for studio and 1 bedroom apartments ▪ 4m for 2 and 3 bedroom apartments	
▪ The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts.	
4E Private Open Space and Balconies	
Objectives Apartments provide appropriately sized private open space and balconies to enhance residential amenity	✓ The indicative scheme provides private open space for apartments through the use of balconies.
Design Criteria All apartments are required to have primary balconies as follows: Dwelling Type / Minimum Area / Minimum internal area Studio apartment / 4m^2 / - 1 bedroom apartment / 8m^2 / 2m 2 bedroom apartment / 10m^2 / 2m 3+ bedroom apartment / 12m^2 / 2.4m The minimum balcony depth to be counted as contributing to the balcony area is 1m.	The indicative scheme indicates general compliance. Details will be provided at the DA stage.
For apartments at ground level or on a podium or similar structure, a private open space is provided instead of a balcony. It must have a minimum area of 15m^2 and a minimum depth of 3m.	Will comply. Details will be provided at the DA stage.
4F Common Circulation and Spaces	
Objective Common circulation spaces achieve good amenity and properly service the number of apartments	✓
Design Criteria The maximum number of apartments off a circulation core on a single level is eight.	✓ There are multiple cores proposed with eight apartments off each core. Detail will be provided at the DA stage.
For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.	✓ There are multiple cores proposed.
4G Storage	

Design Criteria	Proposal
Objective Adequate, well designed storage is provided in each apartment	Details will be provided at the DA stage. The scheme is capable of complying.
Design Criteria In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided: Dwelling Type — Minimum Area Studio apartment — 4m² 1 bedroom apartment — 6m² 2 bedroom apartment — 8m² 3+ bedroom apartment — 10m² At least 50% of the required storage is to be located within the apartment.	The indicative scheme is capable of complying with this requirement. Further design development will be undertaken at DA stage to ensure this is achieved.

Dwelling Mix

The indicative scheme illustrates that the entire site has the potential to accommodate approximately 280 new dwellings comprising a mix of types and sizes, these being:

- 51 x 1 bedroom units;
- 212 x 2 bedroom units; and
- 18 x 3 bedroom units.

The DCP does not identify a required dwelling mix. Notwithstanding this the proposal will still provide an acceptable mix that meets the objectives of the ADG as it will provide a diversity of apartments which cater to differing household needs both now and in the future.

Solar Access and Cross Ventilation

Indicative modelling of the proposal identifies that 74.4% of units (125 of 168) of Site 1 can achieve at least two hours of direct sunlight and 77% for Site 2. This has been modelled on an indicative design for the service station site as any design on that property would be the responsibility of the owner.

Cross ventilation is achievable to 62.5% of units on Site 1 and 66.6% on Site 2.

Landscape

The indicative scheme provides a general landscape concept design that illustrates how landscaping would be provided across the site. The landscape concept seeks to minimise the amount of hardscape within the site and provides private and communal open space areas that have been treated with plantings to soften the built form, maintain solar access and to offer high levels of amenity to future occupants.

Car parking

The indicative scheme indicates the capability for basement parking, with additional parking located on the ground floor behind the commercial premises fronting the street. In total, the scheme provides an indicative 351 car spaces on Site 1 and 228 on Site 2.

Potential commercial component

The indicative scheme identifies commercial floorspace along the ground floor fronting Albert Road to present towards the Strathfield Town Centre. This is a deliberate design measure to facilitate street activation and provide ground floor uses that complement and support the town centre.

Summary

The indicative concept scheme illustrates that a high-quality design outcome is able to be achieved under the proposed planning controls. In particular, the indicative scheme demonstrates that a FSR of 5:1 and a maximum building height of circa 54m will sit comfortably within its surrounding context and will not result in an unacceptable adverse impact on the local area. Furthermore, it also illustrates that the apartments within the indicative scheme will support a high level of residential amenity in accordance with SEPP65, the ADG and the Strathfield DCP 2005.

5.0 Objectives and Intended Outcomes

The objectives and intended outcomes of the Planning Proposal are to:

- Facilitate the achievement and realisation of the Goals, Directions and Actions of A Plan for Growing Sydney, the draft Greater Sydney Region Plan and draft Eastern City District Plan, in particular maximising the delivery of new housing on strategically well located sites that are close to jobs and well serviced by infrastructure, transport, education, recreation and community facility facilities;
- Provide a variety of different housing typologies and products to meet the varying needs of the community, and improve housing choice and affordability in the local area;
- Provide planning controls that will enable the site to realise its full development potential whilst ensuring minimal impact on the surrounding area;
- Maximise the Strathfield Town Centre's potential for transit-oriented development, and minimise the need for land use intensification in less sustainable locations that rely more heavily on private motor vehicles and the sites that are less capable of accommodating increased density;
- Create an urbanised built form environment that reinforces Strathfield Town Centre's role as the primary focal point in the LGA, and which delivers a design outcome that better relates to the Strathfield Triangle and the Columbia Precinct;
- Provide the opportunity to retain a portion of non-residential land uses within the site;
- Facilitate the achievement of a high-quality design outcome that reflects the site's strategic location; and
- Generate investment in the construction sector.

6.0 Explanation of Provisions

This section provides an explanation of the provisions proposed to apply to the subject land under the Strathfield LEP 2012.

6.1 Strathfield LEP 2012

The site falls within the B4 Mixed Use land zoning under the Strathfield LEP 2012, which is proposed to remain unchanged. The following provisions are proposed to apply to the site in the Strathfield LEP 2012 under this Planning Proposal.

6.1.1 Land to which the Plan will apply

The Planning Proposal applies to the site known as 2-4 Pilgrim Avenue and 11-13 Albert Road, Strathfield, legally described as SP8785, Lot 9 DP15917, Lot 8 DP15917, Lot A DP100558, Lot B DP100558 and Lot 100 DP807807.

6.1.2 Maximum Building Height

The Planning Proposal is to amend the Strathfield LEP 2012 Building Height Map as follows:

- **Current** – A maximum building height of 35m currently applies to the site
- **Proposed** – A maximum building height of 54m is proposed to apply to the site

6.1.3 Maximum Floor Space Ratio

The Planning Proposal is to amend the Strathfield LEP 2012 Floor Space Ratio map as follows:

- **Current** – A floor space ratio of 3.5:1 currently applies to the site
- **Proposed** – A floor space ratio of 5:1 is proposed to apply to the site

It should be noted that these controls will apply to the whole site. Specific controls around setbacks could be imposed through a Stage 1 DA, but do not form part of this Planning Proposal.

7.0 Strategic and Statutory Framework

This chapter outlines the strategic and statutory planning framework within which the development outcomes for the land have been considered and provides commentary on how the proposal responds to each of these documents.

7.1 Strategic planning policies

7.1.1 A Plan for Growing Sydney

A Plan for Growing Sydney is the current strategic plan for the Sydney metropolitan area. Having been recently published in December 2014, it represents the most up to date strategic framework and sets out the Government's vision for Sydney as a strong global city and a great place to live. To achieve this vision, it sets out four overarching goals for the region, these being:

- A competitive economy with world-class services and transport;
- A city of housing choice with homes that meet our needs and lifestyles;
- A great place to live with communities that are strong, healthy and well connected; and
- A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

A series of more detailed directions and actions provide the framework for realising the goals and overall vision. These are discussed in further detail below.

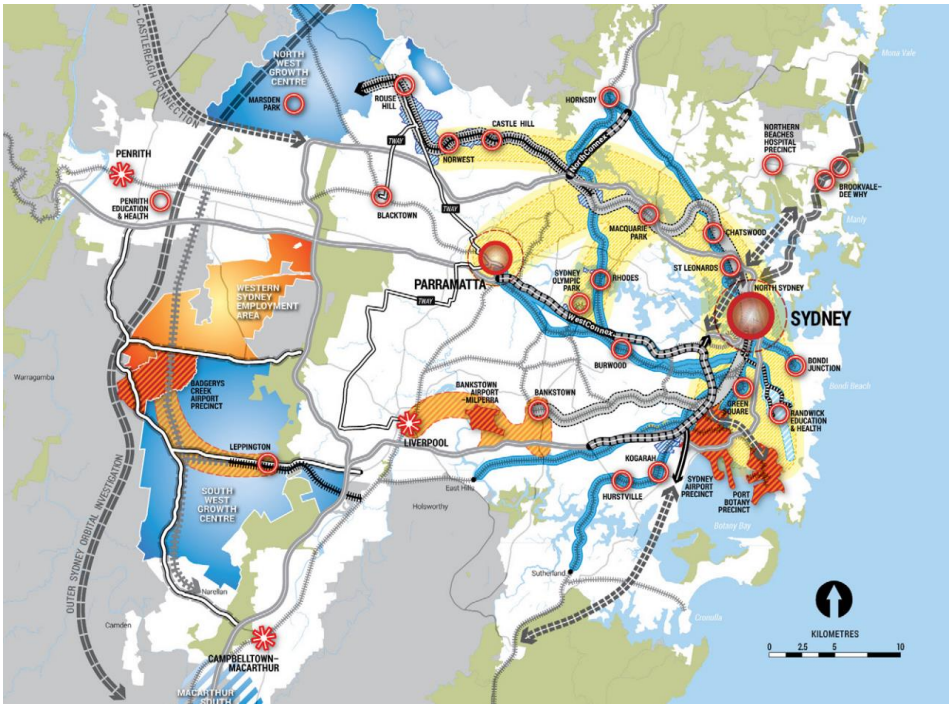

Figure 19 – A Plan for Growing Sydney, NSW Government 2014

Goal 1 – *A competitive economy with world class services and transport*

To ensure that Sydney has a competitive economy with world class services and transport the Plan sets out a number of key priorities including but not limited to:

- Creating new and innovative opportunities for growing and expanding the Sydney CBD office space;
- Diversifying the CBD by enhancing the cultural ribbon that surrounds the CBD including Barangaroo, Darling Harbour, Walsh Bay and the Bays Precinct;
- Growing greater Parramatta as Sydney's second CBD;
- Transforming the productivity of Western Sydney through growth and investment
- Enhancing the capacity of Sydney's gateways and freight networks;
- Expanding the global economic corridor; and
- Growing strategic centres and providing more jobs closer to home.

By carrying out the above, The Plan seeks to support and ensure that Sydney will continue to be a premier location for global commerce, business and investment with strong ties to its region and with world class infrastructure that supports growing, efficient and innovative industries. Of particular relevance to this Planning Proposal is Direction 1.7 which seeks to *'Grow strategic centres – providing more jobs closer to home.'*

The site is located 200m from the Strathfield Railway Station and forms part of the Strathfield Town Centre. In addition, it is situated in close proximity to the Burwood strategic centre, which has excellent access to jobs, education, and community facilities and services. Accordingly, the Plan notes that *"Focusing future growth in both strategic centres and transport gateways will provide the greatest benefits to Sydney in terms of land and infrastructure costs, social infrastructure and social and environmental outcomes."* Direction 1.7 also states that *"Delivering more housing through targeted renewal around centres on the transport network will provide more homes closer to jobs and boost the productivity of the city."* The Planning Proposal will therefore clearly provide an outcome that is consistent with the Plan in this regard.

Goal 2 – *A city of housing choice with homes that meet our needs and lifestyles*

The Plan identifies that some 664,000 additional homes need to be built over the next 20 years to meet forecast demand and highlights that *"The Government must accelerate the delivery of new housing in Sydney to meet the needs of a bigger population and to satisfy a growing demand for different types of housing"*

To achieve this, it sets out a number of strategic directions including:

- Accelerate housing supply across Sydney;
- Accelerate urban renewal across Sydney – providing homes closer to jobs;
- Improve housing choice to suit different needs and lifestyles; and
- Deliver timely and well planned greenfield precincts and housing.

Of particular relevance to this Planning Proposal is Action 2.2.2 which seeks to, *"Undertake urban renewal in transport corridors which are being transformed by investment and around strategic centres".*

The proposal is situated adjacent to an established major public transport interchange and will provide new housing within an established urban area. The Planning Proposal will facilitate increased housing supply in the local area and in this regard, will make a significant contribution to enhancing the local economy and diversifying housing choice to meet the needs of the growing population.

Goal 3 – *A great place to live with communities that are strong, healthy and connected*

To create a city with strong, healthy and connected communities the plan highlights the importance of creating more vibrant places and revitalised suburbs where people want to live, and welcoming centres with character and vibrancy that offer a sense of community and belonging. The key Directions for achieving this goal include:

- Revitalise existing suburbs;
- Create a network of interlinked, multipurpose open and green spaces across Sydney;
- Create healthy built environments; and
- Promote Sydney's heritage, arts and culture.

Of particular relevance to the Planning Proposal is Direction 3.1 which is to 'revitalise existing suburbs'. Under this direction the Plan notes that *"research has found that new housing within Sydney's established suburbs brings real benefits to communities and makes good social and economic sense."*

According to the Plan directing new housing to existing urban areas will reduce the impact of development on the environment and protect productive rural land at the urban fringe. It also improves residents' access to jobs, services and recreation which enhances the liveability of the city. The sites location in an established town centre (Strathfield) adjacent to a key public transport interchange provides the opportunity for an outcome that is directly consistent with this goal and direction.

Goal 4 – *A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources*

The Plan notes that as the city grows, good urban design and planning will be more critical than ever to make the city's built environment sustainable and energy efficient while also protecting the environment. To do this it sets out a number of key strategic directions, these being:

- To protect our natural environment and biodiversity;
- To build Sydney's resilience to natural hazards; and
- To manage the impacts of development on the environment.

The above Directions are relevant to the Planning Proposal and will be supported by the sites future redevelopment as proposed, as it will:

- Promote increased density in a highly appropriate and sustainable location in close proximity to existing transport infrastructure, community facilities and jobs;
- Promote urban renewal of a well located urban block by enabling a built form outcome that respects the surrounding area, is consistent with the locality's transitional status, and which will be capable of providing high residential amenity for future occupants;
- Will release pressure on the urban fringe and support a balanced approach to the use of land and resources by locating new housing and employment opportunities within an existing built up area; and
- Be appropriately designed in accordance with latest ESD initiatives thus minimising impacts on the environment.

Subregional Delivery

The site is included in the Central Subregion of the Plan (now the Eastern City District in the draft Greater Sydney Region Plan and draft Eastern City District Plan) which is expected to continue to play the dominant role in the economic, social and cultural life of Sydney. A Plan for Growing Sydney notes that the variety and diversity of activities and centres in the subregion will be key to creating liveable communities and ensuring that the subregion is a desirable place to live, work and visit. To achieve this, the plan sets a number of priorities for the subregion including the need to identify suitable locations for housing intensification and urban renewal particularly around Priority Precincts, established and new centres, and along key public transport corridors.

The Plan notes that it will continue to support Burwood as a strategic centre and major location for jobs and investment. The site is located in close proximity to the Burwood strategic centre thus ensuring existing and future residents will have excellent access to jobs, education, and community facilities and services.

The subregional plan under *A Plan for Growing Sydney* outlines the framework for growth, and provides future growth expectations and targets including:

- A population increase of 266,850 people to 2031; and
- The provision of 130,700 new residential dwellings by 2031.

The proposed development will support these growth targets through the provision of quality housing and renewed commercial opportunities in close proximity to existing infrastructure and services such as the Strathfield Town Centre, the Strathfield Triangle and the Strathfield Railway Station.

7.1.2 Draft Greater Sydney Region Plan

On 22 October 2017, the Greater Sydney Commission (GSC) released the Draft Greater Sydney Region Plan (draft Metropolitan Plan) for public exhibition. This Plan is a revision of A Plan for Growing Sydney and, once adopted, will become the overarching strategy for growing and shaping the Greater Sydney region. It accommodates changes in policy, trends, directions, and actions that will inform development until 2056. The vision of the draft Metropolitan Plan is framed on the creation of three-city metropolis and enhancing Greater Sydney's liveability, productivity and sustainability. This will also be supported through greater infrastructure provision and collaboration throughout the region.

To support the vision of boosting Greater Sydney's liveability, productivity and sustainability, the GSC have established ten (10) directions which establish the aspirations for Greater Sydney over the next 40 years. These include:

- A city supported by infrastructure
- A collaborative city
- A city for people
- Housing the city
- A city of great places
- A well-connected city
- Jobs and skills for the city
- A city in its landscape
- An efficient city
- A resilient city

This Planning Proposal is generally consistent with the above directions as outlined below in **Table 8**. Each of these directions is supported by several objectives.

Table 8 – Summary of consistency with the directions of the draft Greater Sydney Plan

Connectivity	
A city supported by infrastructure	The Planning Proposal seeks to capitalise on the nearby Strathfield Railway Station key characteristics as a transport interchange. The location of the site within 200m of rail and bus networks will reduce the sites reliance on private motor vehicles while allowing future residents easy and efficient access into greater Sydney.
A collaborative city	The Proposal will assist in the continued recognition of Strathfield as a key strategic centre associated with a transportation hub. While not identified as a Collaboration Area in the draft Plan, the site seeks to support future growth of the existing town centre, allowing for natural growth.
Housing + Great Places	
A city for people	The Proposal looks to provide active frontages with commercial and retail uses at ground level, supporting and complementing the adjacent Strathfield Town Centre. The provision of a public car park on-site will also support the local community in visiting both the Town Centre and acting as a commuter car park for users of the nearby rail network.
Housing the city	The Planning Proposal seeks to increase the permissible height and FSR on the site, allowing the site to take full advantage of its location near to a major transport interchange and provide much needed housing. Strathfield is identified in the draft Eastern City District Plan as needing to provide 3,650 dwellings in the coming years, and the Planning Proposal will contribute approximately 280 of these.
A city of great places	The site is located on the western edge of the Strathfield Town Centre which contains a variety of commercial and retail uses. The provision of active uses on the ground floor of the site through a future DA will contribute to the existing town centre.
Jobs	
A well-connected city	The site can potentially accommodate 280 new dwellings within 200m of a key transport interchange, contributing to the shift towards public transport. Strathfield Railway Station has strong connections to greater Sydney, and is strategically located to allow direct access to the Sydney and Parramatta CBDs via both rail and bus services.
Jobs and skills for the city	The site does not propose significant levels of commercial or employment generating floor space, however the provision of ground floor retail and commercial floor space will contribute to the local economy of the Strathfield Town Centre.
Landscape	
A city in its landscape	The Planning Proposal, while only seeking height and FSR, indicates that a communal open space can be provided in the central part of the site, allowing for landscaping of vegetation including shade trees. This will provide future residents with readily accessible communal space to enjoy.
An efficient city	The site will consolidate urban form on the site and given its location near a key transport interchange will reduce the need for private motor vehicle use.
A resilient city	The Planning Proposal has considered the flooding hazard associated with the site and future DAs will manage this appropriately. Refer to **Section 8.3**.

Draft Eastern City District Plan

In October 2017, the Greater Sydney Commission (GSC) released the revised draft District Plans for the Greater Sydney Metropolitan Region for public exhibition and review. The draft District Plans will fill the gap between the metropolitan plan and Council's Local Environmental Plans giving effect to the metropolitan goals and planning priorities from A Plan for Growing Sydney by setting out priorities and actions for each of the six Sydney District. An assessment of the Planning

Proposals consistency with the relevant priorities and actions is provided in **Table 9**.

The draft District Plans are structured around the GSC's three key themes of a Productive City, a Liveable City and a Sustainable City and aims to achieve the following for Greater Sydney by 2036:

- support the generation of over 817,000 additional jobs;
- accommodate 1.74 million additional people and more than 725,000 new homes;
- increase Greater Sydney's economic growth rate; and
- increase total economic activity by 75% to approximately $655 billion.

The Eastern City District includes Sydney City and economic corridors to its north through the Macquarie Park and south through Sydney Airport and Port Botany to Kogarah. The site is strategically located near the economic corridor and is identified within the pocket of urban renewal area located west of Sydney Airport.

Table 9 – Summary of consistency with the priorities and actions of the draft Eastern City District Plan

Liveability	
Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities	
Action 10	The Planning Proposal will allow for the redevelopment of an underutilised site directly adjacent to the established Strathfield Town Centre. This will contribute to the provision of a walkable place with an active street life (supported by the proposed active frontages to Albert Road and Raw Square) at a human scale. The location of the site near to the Strathfield Railway Station also allows for residents to access schools, social, health, sporting, cultural and shared facilities through the public transport network.
Planning Priority E5: Providing housing supply, choice and affordability, with access to jobs and services	
Action 15	Strathfield Council, as directed by the draft District Plan, will be required to prepare a local or district housing strategy outlining the delivery of housing targets for 5 years, 6-10 years and longer term 20-year periods. The Planning Proposal will facilitate the delivery of approximately 280 new dwellings, contributing to these targets.
Planning Priority E6: Creating and renewing great places and local centres, and respecting the District's heritage	
Action 17	The Planning Proposal is located in an area adjacent to an established town centre, and offers potential for a highly walkable and accessible redevelopment of an inner centre site. This will improve the amenity of the town centre and its surrounds, while introducing active uses to the area, creating a community focus.
Planning Priority E11: Growing investment, business opportunities and jobs in strategic centres	
Action 37 and Action 38	While the Planning Proposal will not contribute significant jobs, it will reinvigorate the existing town centre through a new built form of high quality. This will assist with future leasing opportunities in and around the Strathfield Town Centre, and can potentially be recognised as a natural expansion of the town centre footprint. Furthermore, the provision of residential dwellings near to a transport interchange (the Strathfield Railway Station) will allow residents the option of living in Strathfield and working elsewhere, with the Harbour CBD, Parramatta and Sydney Olympic Park being within 30 minutes – contributing to the creation of a 30-minute city.

The revised draft Eastern City District Plan sets a 20-year strategic target for housing and employment growth within the Eastern City District, with a direction to "create housing capacity in the Eastern City District", targeting 157,500 dwellings by 2036 and a short-term (5-year) housing target of 46,550 new dwellings. Approximately 3,650 of these dwellings are proposed to be delivered in the Strathfield LGA from 2016-2021.

In relation to housing capacity, the draft Plan notes one of Strathfield Council's key actions to prepare housing strategies that address the delivery of five-year housing supply targets. The Planning Proposal will facilitate the delivery of approximately 280 new dwellings, contributing to the above targets set for the Eastern City District and Strathfield LGA.

Strathfield is in proximity to key areas of employment contained in surrounding Strategic and District centres, as shown in **Figure 21**. By enabling renewal, this can be the catalyst to creating a vibrant and rejuvenated centre that fosters a place to live, work and play and a more connected community. In line with the draft Plan, this would deliver upon the principles of the 30-minute city by locating new residents along the various rail lines from Strathfield Railway Station providing access to the following Strategic and District Centres within 30 minutes.

- Green Square / Mascot;
- Harbour CBD;
- Burwood;
- Rhodes;
- Parramatta; and
- Sydney Olympic Park.

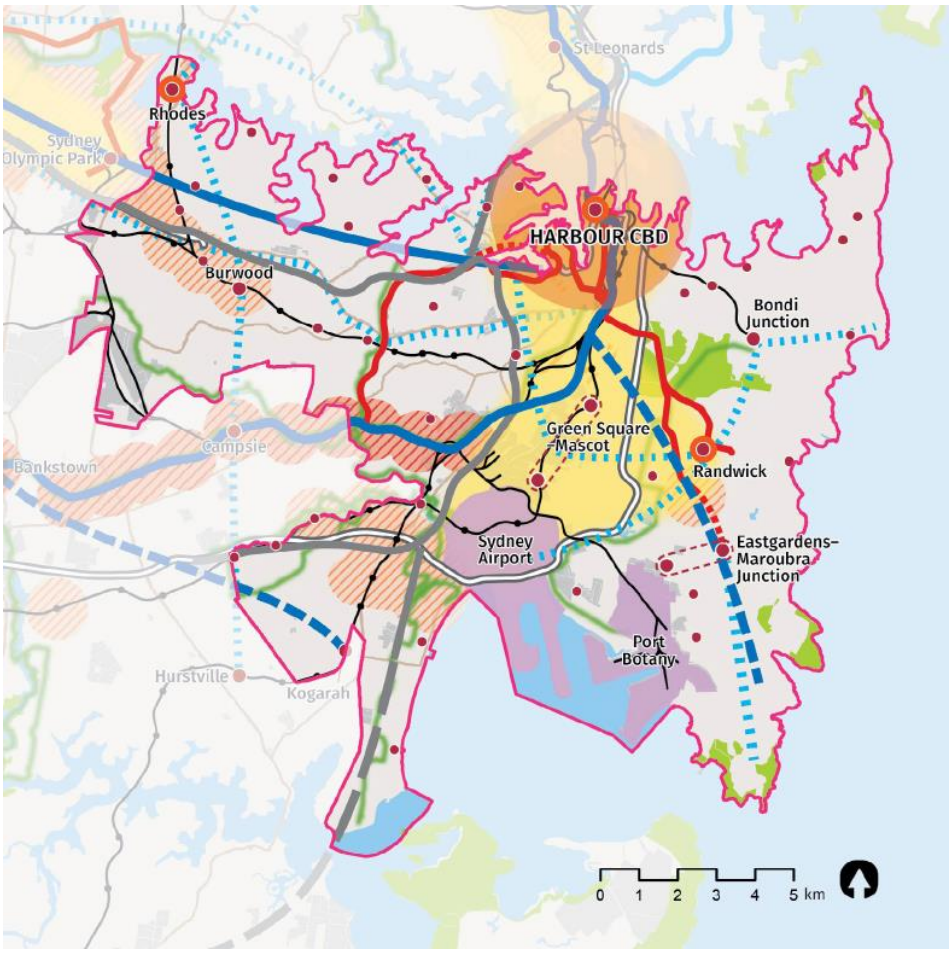

Figure 20 – Eastern City District Structure Plan
Source: Greater Sydney Commission 2017

Summary

The Planning Proposal is consistent with several key directions and actions in A Plan for Growing Sydney, the draft Greater Sydney Regional Plan and the Eastern City District Plan in that it:

- provides for development standards that reflect the site's proximity to a major public transport hub;
- facilitates the expansion of high density residential development to support the significant population growth envisaged for Eastern City District under the draft Greater Sydney Region Plan and the draft Eastern Cirt District Plan;
- is consistent with the Plan's direction that the most suitable areas for urban renewal are those areas best connected to employment and which include centres that are close to jobs and serviced by high frequency public transport that can move large numbers of people;
- it is proposed on a site that has additional capacity for the development and which represents a logical location for increased density;
- provides for the opportunity to deliver more affordable housing, consistent with Action 2.3.3 of the Plan for Growing Sydney and Action 15 of the draft Eastern City District Plan;
- represents consistency with TOD principles by seeking to provide additional capacity around Strathfield Railway Station for additional high-density housing;
- is appropriately located in an area adjacent to a transport corridor, with high accessibility into wider Sydney;
- assists in meeting Strathfield's housing targets of 3,650 homes by 2021;
- represents consistency with the s priorities for the Eastern City District, particularly to work with Councils to identify suitable locations for housing intensification and urban renewal along key public transport corridors;
- ensures that the proposed additional levels on the site achieve a high standard of urban design and architectural excellence that will contribute to the amenity of future residents of and visitors to Strathfield; and
- proposes urban renewal of a site located within a key transport corridor, consistent with Action 2.2.2 of the Plan for Growing Sydney and the goals of the draft Greater Sydney Region Plan.

7.1.3 Strathfield Town Centre Master Plan Project

As discussed in Section 2.2.3, Strathfield Council are in the process of implementing the Strathfield Town Centre Master Plan, which will guide development to the east of the subject site. The primary purpose of the Master Plan is to apply planning controls designed to deliver the important status that the town centre requires, with Strathfield identified as the most important centre in the LGA. Refer to Section 2.2.3 for further detail.

7.2 State legislation

7.2.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (the EP&A Act) and the Environmental Planning and Assessment Regulation 2000 (EP&A Reg) set out amongst other things:

- Requirements for rezoning land;

- Requirements regarding the preparation of a local environmental study as part of the rezoning process;
- Matters for consideration when determining a development application; and
- Approval permits and/or licences required from other authorities under other legislation.

7.2.2 State Environmental Planning Policies

The State Environmental Planning Policies directly applicable to the Planning Proposal are addressed in **Table 10** below.

Table 10 – Applicable State Environmental Planning Policies

State Environmental Planning Policies (SEPPs)	Consistent YES	Consistent NO	N/A	Comment
SEPP No 1 Development Standards			✓	SEPP 1 does not apply to the Strathfield LEP 2012.
SEPP No 32 Urban Consolidation (Redevelopment of Urban Land)	✓			The planning proposal is consistent with SEPP 32 in providing for the opportunity for the development of additional housing in an area where there is existing public infrastructure, transport, and community facilities, and is close to employment, leisure and other opportunities.
SEPP No 55 Remediation of Land	✓			The site is presently used for residential dwellings and a service station, adjacent to an established rail corridor. A Preliminary Site Investigation has been undertaken which indicates that the site can be made suitable for the future intended use. Further investigations will be completed in conjunction with a future Development Application package.
SEPP No 64 Advertising and signage			✓	Not relevant to proposed amendment. May be relevant to future DAs
SEPP No 65 Design Quality of Residential Apartment Development	✓			Compliance with SEPP 65 will be demonstrated at the time of making a development application. Notwithstanding, a high-level assessment of the indicative scheme has been carried out at **Section 6.0**.
SEPP No.70 Affordable Housing (Revised Schemes)			✓	Not relevant to proposed amendment.
SEPP (Affordable Rental Housing) 2009			✓	Not relevant to proposed amendment
SEPP (BASIX) 2004	✓			Compliance with SEPP (BASIX) will be demonstrated at the time of making a development application.
SEPP (Exempt and Complying Development Codes) 2008	✓			May apply to future development of the site.
SEPP (Infrastructure) 2007	✓			A preliminary traffic assessment has been undertaken (provided at Annexure C). It is proposed that a further detailed traffic assessment be undertaken as part of the Development Application stage.

7.2.3 Is the Planning Proposal consistent with applicable S.117 Ministerial Directions?

Consistency with the Ministerial Directions for LEPs under Section 117 of the Environmental Planning and Assessment Act 1979 is provided in **Table 11**.

Table 11 – Consistency with Ministerial Directions

No.	Title	Consistency with Planning Proposal
1.	**Employment and Resources**	
1.1	Business and Industrial Zones	The site is located in the B4 Mixed Use Zone. The proposal does not seek to change the zoning of the site, but rather the FSR and height controls to permit a mixed-use development.
1.2	Rural Zones	Not applicable – this planning proposal does not seek to rezone from a rural land use to a residential, business, industrial, village or tourist land use
1.3	Mining, Petroleum Production and Extractive Industries	Not applicable
1.4	Oyster Aquaculture	Not applicable
1.5	Rural lands	Not applicable
2.	**Employment and Heritage**	
2.1	Environmental Protection Zones	Not applicable
2.2	Coastal Protection	Not applicable
2.3	Heritage Conservation	Not applicable
2.4	Recreation Vehicle Areas	Not applicable
3.	**Housing, Infrastructure and Urban Development**	
3.1	Residential Zones	The Planning Proposal is consistent with Clauses 4 and 5 of this direction. The proposed amendment will allow for the provision of a variety of additional housing in a highly appropriate location, adjacent to a key public transport interchange and an emerging town centre.
3.2	Caravan Parks and Manufactured Home Estates	Not applicable
3.3	Home Occupations	Not applicable
3.4	Integrating Land Use and Transport	The Planning Proposal is consistent with this direction and the relevant government policies that apply to the Direction. The site is well served by public transport and the proposal will maximise the use of these facilities.
3.5	Development near Licensed Aerodromes	Not applicable
3.6	Shooting Ranges	Not applicable
4.	**Hazard and Risk**	
4.1	Acid Sulfate Soils	The site is identified as being within a Class 5 Acid Sulfate Soils zone under the LEP. The Prospect-Parramatta River Acid Sulfate Soil Risk Map identifies the site as within the map class of 'No Known Occurrence'. This considers that acid sulfate soils are not known or expected to occur and 'land management activities are not likely to be affected by acid sulfate soil materials'. As previously stated, the site is not proposing a change in land uses, only changes to permissible height and FSR controls. Refer to Appendix I.
4.2	Mine Subsidence and Unstable Lands	Not applicable
4.3	Flood Prone Land	Strathfield Council have recently received the Powells Creek and Saleyards Creek Flood Study from WMA Water (November 2016, at Appendix H). This study identifies that the site is subject to the Powells Creek catchment area, and during flood events is impacted by overland flow and the main channel in parts. However the use of appropriate freeboard levels will assist in reducing the flood risk impact to development on the site, noting that the site is already zoned for a residential purpose and this planning proposal seeks only height and FSR increases.
4.4	Planning for Bushfire Protection	Not applicable

No.	Title	Consistency with Planning Proposal
5.	**Regional Planning**	
5.1	Implementation of Regional Strategies	Not applicable
5.2	Sydney Drinking Water Catchments	Not applicable
5.3	Farmland of State and Regional Significance on the NSW Far North Coast	Not applicable
5.4	Commercial and Retail Development along the Pacific Highway, North Coast	Not applicable
5.5	Development on the vicinity of Ellalong	Not applicable
5.6	Sydney to Canberra Corridor	Not applicable
5.7	Central Coast	Not applicable
5.8	Second Sydney Airport: Badgerys Creek	Not applicable
6.	**Local Plan Making**	
6.1	Approval and Referral Requirements	Not applicable
6.2	Reserving land for Public Purposes	Not applicable
6.3	Site Specific Provisions	Not applicable
7.	**Metropolitan Planning**	
7.1	Implementation of the Metropolitan Plan for Sydney 2036	The Planning Proposal will provide an outcome consistent with this Direction and the provisions of the Plan for Growing Sydney, the draft Greater Sydney Region Plan and the draft Eastern City District Plan.

7.3 Strathfield LEP 2012

7.3.1 Consistency with overall aims

The proposal's consistency with the overall aims of the Strathfield LEP 2012 is demonstrated in **Table 12** below.

Table 12 – Consistency with overall aims of Strathfield LEP 2012

Aim	Proposal	Consistency
(a) to achieve high quality urban form by ensuring that new development exhibits design excellence and reflects the existing or desired future character of particular localities and neighbourhoods in Strathfield	The proposal will facilitate delivery of housing in a highly appropriate location adjacent to public transport and the Strathfield Town Centre, consistent with the aims for Strathfield as defined in the draft Central District Plan.	✓
(b) to promote the efficient and spatially appropriate use of land, the sustainable revitalisation of centres, the improved integration of transport and land use, and an appropriate mix of uses by regulating land use and development	The proposal will provide new housing and employment opportunities that will support local business, educational, cultural and tourism activities in the local area	✓
(c) to promote land uses that provide a wide range of employment, recreation, retail, cultural, service, educational and other facilities for the local community	The proposal will result in the redevelopment of a key landholding near the Strathfield Town Centre, and will ensure the centre is reinvigorated through the provision of a mix of residential and non-residential	✓
(d) to provide opportunities for economic growth that will enhance the local community	The proposal will provide opportunities for additional residential and non-residential floor space and in this regard, will support the future growth of Sydney.	✓

Aim	Proposal	Consistency
(e) to promote future development that integrates land use and transport planning, encourages public transport use, and reduces the traffic and environmental impacts of private vehicle use	The site is in a highly appropriate urban location close to an established key public transport interchange in accordance with the draft Central District Plan, and presents an opportunity to contribute to the areas future growth through provision of a diversity of housing to suit the market's needs. Detailed design will be explored at DA stage. The indicative scheme prepared by Kennedy Associates Architects demonstrates that the site can be redeveloped in a way that embodies the principles of achieving good amenity and design for future residents and the local community, particularly given the sites proximity to the Strathfield Town Centre.	✓
(f) to identify and protect environmental and cultural heritage	The proposal would not impact on environmental and cultural heritage as the site is well established in a disturbed urban area.	✓
(g) to promote opportunities for social, cultural and community activities	The proposal will facilitate the intensification of a highly accessible urban site and introduce active frontages to the site near to the existing Town Centre. This would direct residents to the Town Centre and its associated social, cultural and community activities.	✓
(h) to minimise risk to the community by identifying land subject to flooding and restricting incompatible development	The proposal would support the renewal of an established urban area with commercial uses on the ground floor and residential uses above, removing the potential risk to human life during a rainfall event. Further studies would likely be completed post-Gateway.	✓

7.3.2 Consistency with height objectives

The proposal's consistency with the relevant height objectives under the Strathfield LEP 2012 is demonstrated in **Table 13** below.

Table 13 – Consistency with height objectives of Strathfield LEP 2012

Objective	Proposal	Consistency
(a) to ensure that development is of a height that is generally compatible with or which improves the appearance of the existing area	The proposal seeks to increase heights to create a suitable transition from the taller residential flat buildings to the east and to the existing dwelling housing to the west, noting the additional taller residential buildings further to the west. As demonstrated by the indicative scheme the proposed height limits will not have an adverse impact on the surrounding area, rather will focus development towards the rail corridor in the north.	✓
(b) to encourage a consolidation pattern that leads to the optimum sustainable capacity height for the area	As demonstrated in the indicative scheme, redevelopment of the site in accordance with the proposed height controls will facilitate an appropriate height from east to west and south to north, and proposed heights will not have an unacceptable adverse impact on amenity and views.	✓
(c) to achieve a diversity of small and large development options		✓

7.3.3 Consistency with density objectives

The proposal's consistency with the floor space ratio objectives under the Strathfield LEP 2012 is demonstrated in **Table 14** below.

Table 14 – Consistency with FSR objectives of Strathfield LEP 2012

Objective	Proposal	Consistency
(a) to ensure that dwellings are in keeping with the built form character of the local area	The proposal will allow for a level of density which is appropriate for the site that reflects its strategic location near the railway station and which reinforces the higher order built form character of the town centre and its surrounds.	✓
(b) to provide consistency in the bulk and scale of new dwellings in residential areas	The proposed building bulk is commensurate with the site's location and is integrated with the general height and scale of the immediate surrounding context.	✓
(c) to minimise the impact of new development on the amenity of adjoining properties	The proposal has been designed to reduce amenity impacts on neighbouring residential development through on-site building orientation.	✓
(d) to minimise the impact of development on heritage conservation areas and heritage items	The proposal does not impact on any heritage conservation areas or heritage items.	✓
(e) in relation to Strathfield Town Centre: (i) to encourage consolidation and a sustainable integrated land use and transport development around key public transport infrastructure, and (ii) to provide space for the strategic implementation of economic, social and cultural goals that create an active, lively and people-orientated development	The proposal consolidates development into a built form adjacent to the existing Strathfield Town Centre and Strathfield Railway Station to the east and provides a focus towards the rail corridor. The introduction of active frontages through commercial uses will enhance the town centres entrance point to the east.	✓
(f) in relation to Parramatta Road Corridor—to encourage a sustainable consolidation pattern that optimises floor space capacity in the corridor	Not applicable.	N/A

8.0 Environmental Analysis

This chapter of the report draws on the work undertaken by specialist contractors and summarises the existing environment of the site. The purpose is to provide an understanding of how the existing physical conditions and features of the land have shaped and informed the rezoning proposal and how, in turn, the rezoning proposal potentially impacts on these environmental features and conditions. The management response to any issues and impacts identified in the environmental analysis is also discussed.

8.1 Built Form and Overshadowing

The built form controls sought by this planning proposal result from a site-specific analysis involving the development and testing of several alternative design options. These were assessed in terms of their design outcomes and impacts on the surrounding area, with those less suited dismissed.

The built form illustrated in the indicative scheme and facilitated by this planning proposal therefore represents a deliberate design response to the site's surrounding context and its location adjacent to the existing rail corridor, the Strathfield Town Centre to the east and the Strathfield Triangle to the north, to establish the continuity of development through the area.

In addition to the above it should be noted that the Urban Design Report prepared by Kennedy Associates Architects also confirms that:

- The shadow footprint cast by the proposed buildings contained in the scheme will not result in any unacceptable overshadowing impacts on surrounding development;
- The additional height proposed will not result in any adverse visual impacts nor will it unreasonably restrict or block views from surrounding existing or future buildings due to the design of multiple towers of varying heights; and
- The proposed changes will support a built form outcome that recognises and responds to its current and future surroundings with its surroundings along the sites boundaries and both street frontages.

8.1.1 Overshadowing

The shadow diagrams prepared by Kennedy Associates Architects indicate that there will be no adverse impacts on solar access to neighbouring properties to the south or east of the subject site. While there is overshadowing present, the indicative scheme building orientation ensures that there is more than three hours of sunlight available to neighbouring properties. In particular, the new construction to the south of the subject site will still retain at least two hours (between 2.3 and 3.3 hours per unit between 8am and 4pm) of sunlight per day, subject to full development of the subject site (Site 1) and adjacent Shell Service Station (Site 2) at the proposed planning controls. Specifically, the solar access to that neighbouring property occurs mainly towards the middle of the day between 9am and 3pm.

In light of the above the proposed LEP height and FSR amendments are considered to be acceptable as they will allow the proposed to maximise the sites true development potential while providing greater flexibility to achieve a superior built form and public amenity outcome for the site than that of the current LEP controls.

8.2 Visual Impact

A visual impact analysis has been completed for the proposal (refer to **Appendix A**), with nine viewpoints from the surrounding neighbourhood identified. These viewpoints show that the building is appropriate in its context. It is noted that:

- Viewpoints A and B along Albert Road indicate that the site is generally screened from view due to established vegetation;
- Viewpoint C at the Elva Street and Albert Road intersection identifies the building is visible however does not overpower the existing vista provided along that corridor, rather acts as an identifiable edge of the town centre;
- Viewpoints D, E and F show the building in relation to the existing Town Centre, where it is clear that it supports the established built form by providing an end point; and
- Viewpoint H, along Leicester Avenue in the Strathfield Triangle to the north is introduced to the built form through its acting as a termination point of that view corridor.

The proposed planning control changes will result in a built form that has a minimal visual impact when seen from several key view corridors included those from lower density areas. The existence of established vegetation along the main view corridors to the site, allows for screening of the site and any future development from most view corridors, even when deciduous tree species drop their leaves. The proposed height limit for the site will not introduce an overbearing physical built form that will impact on the aesthetics of the town centre and surrounding area.

The potential built form, where seen from view corridors, acts as a termination point of that vista, and establishes a boundary for the existing town centre.

8.3 Flooding & Stormwater

The JRPP identified in the Pre-Gateway Review process that as there is no change in the permissible land uses for the site, hydraulic studies can be left to the future DA stage. However, the Gateway Determination issued by the DPE identifies that a flood study is to be provided indicating the suitability of the site for redevelopment.

Council have recently received the Powells Creek and Saleyards Creek Revised Flood Study (November 2016) prepared by WMA Water. The Flood Study is appended at **Appendix H**. The study looks at the catchment areas of Powells Creek and Saleyards Creek, with modelling completed using the TUFLOW model.

The model recognises obstructions as 'hydraulic structures' and which include buildings, fencing, bridges and assumptions of blockage during flood events. Results from this study are available in this report at **Appendix H**.

There are several key terms used in flood modelling including:

- Annual Exceedance Probability (AEP): the chance of a flood of a given or larger size occurring in any one year, usually expressed as a percentage. For example, if a peak flood discharge of 500 m3/s has an AEP of 5%, it means that there is a 5% chance (that is one-in-20 chance) of a 500 m3/s or larger event occurring in any one year (see ARI).
- Average Recurrence Interval (ARI): the long-term average number of years between the occurrence of a flood as big as, or larger than, the selected event. For example, floods with a discharge as great as, or greater than, the 20-year

ARI flood event will occur on average once every 20 years. ARI is another way of expressing the likelihood of occurrence of a flood event.

- Probable Maximum Flood (PMF): this is the largest flood that could occur at a particular location, estimated by probably maximum precipitation, combined with the worst flood producing catchment conditions. It is generally not physically or economically possible to provide complete protection against a PMF. PMF defines the extent of the flood prone land (the flood plain).

The flood study defines the 'flood planning area' (FPA) as:

The area of land below the flood planning level and thus subject to flood related planning controls.

The 'flood planning level' (FPL) is defined as:

The combinations of flood levels (derived from significant historical flood events or floods of specific AEPs) and freeboards selected for floodplain risk management purposes, as determined in management studies and incorporated in management plans.

Council determined that this study would identify the FPA by the following criteria:

- Mainstream flooding (with a significantly sized open channel
  - land inundated in the 1% AEP flood extent; and
- Overland flooding
  - The lot is subject to 100mm or greater depth of inundation in the 1% AEP event as defined in the study; and
  - At least 10% of the lot is inundated by floodwaters (i.e. the depth is greater than 0m).

Hydraulic categories define the type of floodwaters present:

- Floodway is defined as areas where:
  - the peak value of velocity multiplied by depth (V x D) > 0.25 m2/s AND peak velocity > 0.25 m/s, OR
  - peak velocity > 1.0 m/s AND peak depth > 0.15 m.
- Flood Storage comprises areas outside the floodway where peak depth > 1 m; and
- Flood Fringe comprises areas outside the Floodway where peak depth < 1 m.

These categories are further refined into a High Risk (classified as Floodway and Flood Storage) and Low Risk (classified as Flood Fringe) categories.

Based on these definitions, the following results were modelled for the subject site.

Table 15 – Flood model results for the site

Address	1%AEP Main Channel Flood Depth (min-max)	1%AEP Main Channel Flood Level (min-max)	1% AEP Overland Flood Depth (min-max)	1%AEP Overland Flood Level (min-max)	Main Channel Flood Planning Level Max	1% AEP Overland Flow Hazard
9 Albert Road	0.00	0.00	0.15-1.69	9.89-9.95	N/A	High
11 Albert Road	0.00	0.00	0.10-0.53	9.57-9.95	N/A	High

Address	1%AEP Main Channel Flood Depth (min-max)	1%AEP Main Channel Flood Level (min-max)	1% AEP Overland Flood Depth (min-max)	1%AEP Overland Flood Level (min-max)	Main Channel Flood Planning Level Max	1% AEP Overland Flow Hazard
13 Albert Road	0.00	0.00	0.08-0.32	9.44-9.74	N/A	Low
2 Pilgrim Avenue	0.00	0.00	0.00	0.00	N/A	Low
4 Pilgrim Avenue	0.00	0.00	0.01-0.58	9.43-9.95	N/A	Low
6 Pilgrim Avenue	0.17-0.17	9.44-9.44	0.07-0.57	9.43-9.95	9.94	Low

Source: WMA Water

Specifically, Albert Road (near to the intersection with Raw Square, ID20, 1%AEP depth of 0.48m and PMF depth of 2.89m) and Pilgrim Avenue (near the end of the road adjacent to the rail corridor, ID38, 1% AEP depth of 0.55m and PMF depth of 3.16m) are identified as road hotspots. A road hotspot is where there is a known flood issue, identified by considering previous flood event accounts and examination of the flood behaviour.

Mapping of the site (**Figure 22**) indicates that only a small portion of 6 Pilgrim Avenue is mapped within the main channel (dark blue), with overland flow occurring on the remainder of the site (light blue).

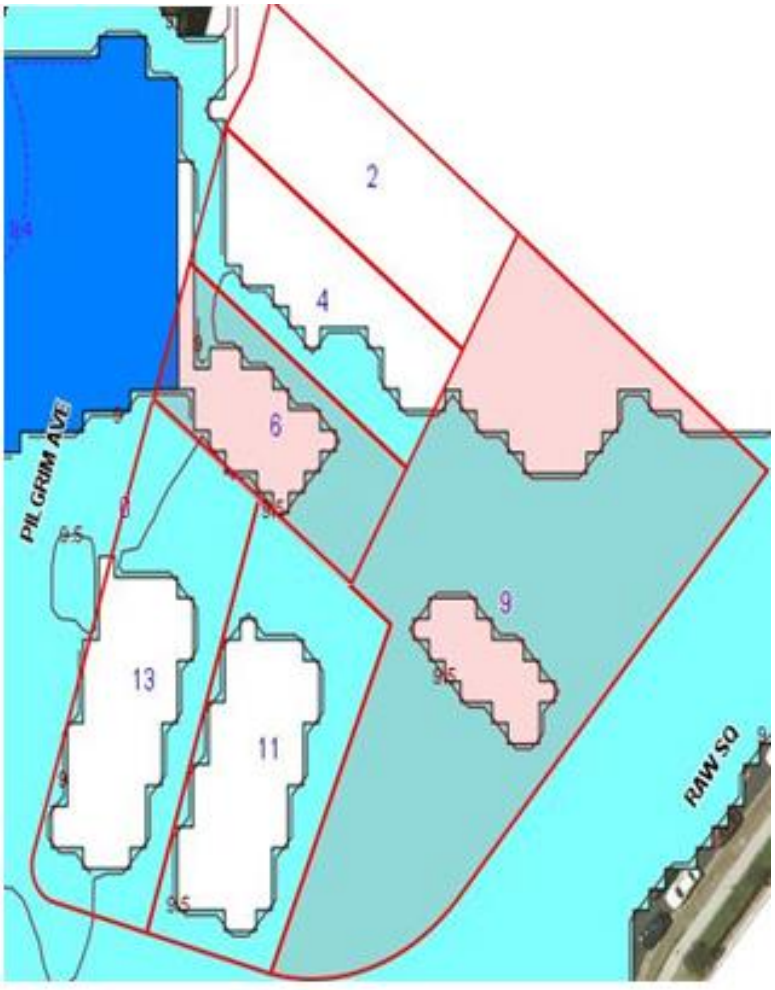

Figure 21 – Flood Planning Level mapping of the site
Source: Strathfield Council

From the above, the site has a flood planning level of between 9m and 9.5m AHD. The site has an existing ground level that ranges from 8.07m AHD to 9.87m AHD and is therefore subject to a small amount of potential flooding in the order of 0.9m. Given the relatively low flooding level it is considered that future development will be able to be easily designed to achieve the necessary freeboard above this level.

8.4 Contamination

Clause 6 of State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55) requires that prior to the rezoning of land for residential, recreational, educational or child care purposes, the consent authority unless it has considered whether the land is contaminated and whether it is suitable or can be made suitable for the proposed uses.

This Planning Proposal seeks to amend the LEP building height and density controls and does not seek to change the zoning or permissible land uses on the site, noting that residential development is already a permissible use. However, the sites location adjacent to an established rail corridor introduces the potential for contamination from hydrocarbons and other heavy metals used in historical rail transportation.

A Preliminary Site Investigation (PSI) has been prepared by EI Australia (**Appendix I**) to confirm the presence of any contamination on the site. The PSI included on-site monitoring, conducted in January 2018.

Five test bores, resulting in five fill samples were extracted from the site (BH101M-BH105M). General observations during the investigation works include no odours noted, no visual signs of contamination were noted in fill samples and no fragments of asbestos were visually identified. The boreholes were sampled to a depth of:

- BH101M – 5.20m (drill bit refusal, converted to monitoring well);
- BH102 – 2.80m (target depth reached);
- BH103 – 2.00m (target depth reached);
- BH104M – 4.30m (drill bit refusal, converted to monitoring well); and
- BH105M – 4.90m (drill bit refusal, converted to monitoring well).

A further three groundwater monitoring wells were installed and left in place for a week. Water level gauging, well purging, field testing and groundwater sampling were unable to be completed due to the wells remaining dry the entire sampling time. These wells were drilled to the following depths:

- BH101M – 5.0m deep;
- BH104M – 4.3m deep; and
- BH105M – 4.9m deep.

Based on the previous investigations EI Australia understand that groundwater in surrounding areas is generally encountered at approximately 7m below ground level.

Figure 22 – Borehole and Groundwater Monitoring Locations
Source: EI Australia

The boreholes have identified the general site geology and subsurface profile, with bedrock being between 2.5m and 4.9m below ground level. Between these depths the subsurface of the site is made up of fill (silty clay and clay), natural (clay of high and medium plasticity) and residual soils (weathered claystone and silty clay of high plasticity).

Laboratory analysis of the collected samples was conducted. Specific Soil Investigation Levels (SILs), and Ecological Investigation Levels (EILs) were adopted for the analysis, assessed against the National Environmental Protection Measure 2013 (NEPM). The analysis identified that no hydrocarbons, pesticides, polychlorinated biphenyls and asbestos were above the adopted SILs. Copper, lead and zinc were identified as exceeding the adopted EILs. The lead concentration was found to be below the adopted levels at deeper sampling levels below the ground surface, suggesting that the lead impact was limited to the fill layer only. Generally, this exceedance was in the extent of future basement excavation, with the lead contaminated fill likely to be removed during bulk earthworks related to a future development application.

Investigation was not able to be conducted on the service station site due to the ongoing operation of the premises. Due to the presence of underground storage tanks on the site, the tanks and associated infrastructure would require decommissioning in accordance with the *Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2008*, during any future development application on the site.

Based on the PSI findings, it is considered that the site can be made suitable for the proposed land use.

8.5 Access, Traffic and Transport

Off street parking will be provided on site in accordance with Council's requirements. Under the current indicative concept, parking will be provided for both the residential and commercial components in a five-level basement and ground floor lower ground/partial basement level with access from Pilgrim Avenue. There will be 351 car spaces provided in total on Site 1, with capacity for a further 228 on Site 2. A total of 30 spaces will be dedicated for public commuter parking within Site 1. These parking requirements have been calculated using Council's DCP rates to identify the worst-case scenario. Further detailed assessment will be provided during the DA stage. All car parking spaces and manoeuvring zones will be designed in accordance with relevant Australian Standards.

The vehicular access is located from the secondary Pilgrim Avenue and as such, reduces the pressure on Albert Road for access. Detailed analysis of the proposed parking arrangements and potential traffic impacts of the proposal are contained in the accompanying Traffic Impact Assessment prepared by McLaren Traffic Engineers at **Appendix C**. Following their analysis, it is concluded that the proposed parking provisions are acceptable for the proposed use of the site and that any additional traffic generation will able to be accommodated into the surrounding road network with negligible impacts.

The site fronts to Albert Road (Classified Regional Road) in the south, Pilgrim Avenue (Unclassified Local Road) in the west and Raw Square (Classified State Road) in the east, which acts as the main north-south connection in the immediate area. The Planning Proposal indicative scheme identifies that vehicular access to the site would be off the dead-end Pilgrim Avenue, removing the need for slow turning vehicles on Albert Road near to the intersection with Raw Square.

Traffic modelling for the indicative scheme has been undertaken by McLaren Traffic Engineers (**Appendix C**) using trip generation rates as specified within the RMS Guide to Traffic Generating Development. The RMS rates identify reduced trip rates for high-density residential developments, including those near public transport hubs. This modelling has resulted in the proposed development potential of the site resulting in a maximum traffic generation of 160 vehicle trips in the AM peak (79 inbound and 81 outbound) and 149 vehicle trips in the PM peak (72 inbound and 77 outbound). No reduction for the existing use of the site was applied during this modelling, resulting in a worst-case scenario being calculated.

Due to the sites location and proposed driveway entry, traffic generation of the site is assumed to travel via Raw Square with 67% of exiting vehicles using Raw Square northbound and 33% southbound. Furthermore, 40% of arriving vehicles will use Raw Square northbound and 60% southbound.

Existing intersection performance for the Pilgrim Avenue and Albert Road intersection identifies a Level of Service (LoS) of 'A' in the AM and PM peak periods, and Albert Road and Raw Square having a 'B' LoS for the same. A LoS is a qualitative measure of performance describing operational conditions, with 'A' representing the best operational condition.

The modelled traffic impacts of the indicative scheme, using the Sidra Intersection 7.0 system, results in no change in LoS for the Pilgrim Avenue and Albert Road intersection. The Albert Road and Raw Square intersection retains a 'B' LoS for AM and PM peak periods. This equates to an additional delay of 1.4 and 0.8 seconds during both the AM and PM peak periods, which is considered to be low and without adverse impacts on the intersection. The Raw Square and Everton

Road roundabout changes from an 'A' LoS in the PM peak period to a 'B' LoS with a 2.1 second delay increase. It must be noted that this is modelled on the worst-case scenario. Additionally, the provision of car parking for the site has been calculated from Council's DCP, which has considerably higher rates than those of the RMS Guide to Traffic Generating Development, which provides smaller parking requirements due to a sites location near a transport hub and within a regional metropolitan area.

Additionally, the site is located within 200m of the Strathfield Railway Station and Bus Interchange, which provide numerous routes and services. Sydney Buses operate numerous bus routes (407, 408, 415, 466, 480 and 483) along Albert Road and into the Strathfield Town Centre which provide access into greater Strathfield. No proposed changes to bus stops or routes form part of the indicative scheme.

8.6 Noise and Air Quality

The site sits adjacent to an established, highly trafficked rail corridor. Any noise impacts on residential units within the subject site from this rail corridor will be dealt with through appropriate management measures identified within a future development application.

An Acoustic Assessment completed by Acoustic Noise and Vibration Solutions included attended and unattended noise monitoring which was carried out on-site between 22 and 28 November 2017. Results from this monitoring provide that noise reduction will be required for any future built form on the site. This monitoring was conducted to review the noise impacts of the adjacent service station, rail corridor and road network near to the site. Two locations were selected – Location A was located on the boundary of the service station Site 2, and Location B was conducted on the boundary of Site 1 and the rail corridor.

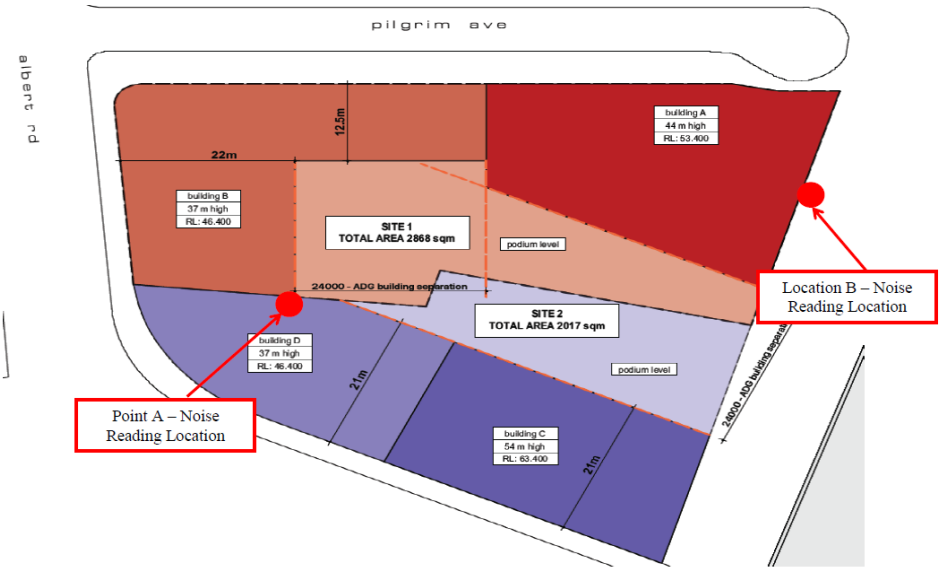

Figure 23 – Noise monitoring locations
Source: Acoustic Noise and Vibration Solutions

Results modelled for the site are based on the applicable noise criteria for residential buildings from the Development Near Rail Corridors and Busy Roads Interim Guideline which provides for an applicable noise criterion of 35dB(A) in any bedroom between 10pm and 7am, and elsewhere of 40dB(A) at any time.

Table 16 – Service Station monitoring location results

LAeq dB(A), 7am-10pm (conservative sample)			LAeq dB(A), 10pm-7am (conservative sample)		
Outdoor Rail Noise	Noise Criteria	Noise Reduction	Outdoor Rail Noise	Noise Criteria	Noise Reduction
63	40	23	55	35	20

Table 17 – Rail Noise Survey Results, Noise Criteria and Nosie Reduction Required

LAeq dB(A), 7am-10pm (conservative sample)			LAeq dB(A), 10pm-7am (conservative sample)		
Outdoor Rail Noise	Noise Criteria	Noise Reduction	Outdoor Rail Noise	Noise Criteria	Noise Reduction
63	40	23	55	35	20

To ensure the development achieves the required noise criteria for residential purposes in bedrooms and other areas, recommendations based on the above noise modelling results include:

- Sliding windows, doors and skylights in the living/kitchen/dining and bedroom areas facing the railway line are to be 10mm laminated with full acoustic seals;
- Sliding windows, doors and skylights in the living/kitchen/dining and bedroom areas facing the Albert Road and the service station are to be 10/12mm laminated with full acoustic seals;
- External doors are to be 42mm thick solid core; and
- External walls are to be double skin cavity bricks in a double brick/brick veneer construction.

These above construction details and noise mitigation measures will form part of any future development application for the site. For full details refer to the Acoustic Report at Appendix E.

An Air Quality Assessment (AQA) prepared by Todoroski Air Sciences (**Appendix F**) conducts an assessment of the potential redevelopment of the site, assuming the service station on Site 2 does not get developed at the same time as the remainder of the site.

The AQA considers the emissions associated with the existing service station, the applicability of fuelling bays and bowsers and the provision of vapour recovery on the fuel pumps. Conservative estimates consider the service station has a throughput of approximately 10 million litres of fuel per annum.

Key pollutants from fuel vapours that have the scope for any impact are benzene and toluene, with emissions calculated at 0.78% and 1.9% of the total volatile organic compound emissions respectively. Volatile organic compound emissions from diesel are significantly lower than emissions from petrol.

Dispersion modelling completed indicates that the varpour emissions from the service station would not lead to unacceptable impacts across the remainder of the site, based on methodology from the *Air Emissions Inventory for the Greater Metropolitan Region in New South Wales 2008 Calendar Year Commercial Emissions* by the Environmental Protection Authority.

The assessment results show the predicted levels of benzene and toluene would be below the respective air quality criterions across the remainder of the site. The most limiting pollutant is benzene, which is predicted to be at approximately one fifth of the acceptable level. This indicates that up to approximately five times more fuel throughput would be acceptable.

9.0 Assessment of Planning Proposal against NSW Department of Planning & Infrastructure Guidelines

The following section includes an assessment against the requirements in *A guide to preparing planning proposals* published by the Department of Planning and Infrastructure in October 2012.

9.1 Parts 1 and 2

Parts 1 and 2 of the guide have been covered in **Section 4** and **Section 5**, which outlines the objectives and intended outcomes of the proposal, as well as how the intended outcomes can be achieved through amendments to the LEP.

9.2 Part 3 - Justification

9.2.1 Need for a Planning Proposal

Q1 – Is the planning proposal a result of any strategic study or report?

This planning proposal is not the result of a strategic study or report but rather a site specific urban design analysis undertaken by Kennedy Associates Architects to determine the site's development potential taking into considering site specific constraints and opportunities and the immediately surrounding context. An Urban Design Report outlining the proposal's underlying design rationale is included at **Appendix A**. Built form is also discussed within section 4.2 of this report.

Q2 – Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

This planning proposal represents the best means of achieving the intended outcome and objectives as it allows the site to realise its full development potential in a building form that is most likely to achieve a high-quality design. The changes to the applicable height and density controls will support the creation of a built form that is consistent with the more intense forms of development in the Strathfield Town Centre, Strathfield Triangle and the Columbia Precinct. The additional height and density will not have any adverse or noticeable environmental impacts. If density is not provided on this site, it would need to be provided elsewhere in a location less suitable for new housing.

9.2.2 Relationship to strategic planning framework

Q3 – Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?

The Plan for Growing Sydney seeks to maximise housing delivery and development in locations with excellent access to public transport, services and facilities. The site is situated within immediate walking distance of the Strathfield Railway Station and adjacent to the Strathfield Town Centre which is earmarked for future redevelopment under the current master plan for the centre. The planning proposal supports this policy by delivering additional housing to meet future housing needs and is provided in a form that supports a better design and development outcome for the locality.

Consistency with the Plan for Growing Sydney is discussed further in section 7.1.1.

Q4 - Is the planning proposal consistent with a council's local strategy or other local strategic plan?

The planning proposal is situated to the west of the Strathfield Town Centre Master Plan, which outlines a vision for the area and sets out several underlying development guidelines including the desire for the Town Centre to improve its status as the centre of Strathfield through increased heights and densities. The planning proposal will facilitate the transition and continuity of these development guidelines through expanding the town centre area and providing a visual link with the Strathfield Triangle to the north of the site across the rail corridor.

Q5 – Is the planning proposal consistent with applicable State Environmental Planning Policies?

An assessment of the Planning Proposal against applicable State Environmental Planning Policies (SEPPs) is provided in **Table 10** above. As set out in that table the planning proposal supports an outcome that is consistent with the SEPPs.

Q6 – Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?

An assessment of the Planning Proposal against the Section 117 Directions is provided in **Table 11** above. As shown in this table the planning proposal is consistent with the relevant directions for planning proposals issued by the Minister for Planning under Section 117(2) of the EP&A Act.

9.2.3 Environmental, social and economic impact

Q7 – Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

Given the sites highly urbanised location the planning proposal will not result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats.

Q8 – Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

A detailed assessment of the environmental impacts of the planning proposal is provided in **Section 8.0**. As demonstrated in this analysis, whilst the proposal will result in a change in the mass, height and appearance of future development of the site the proposed changes will not result in any unacceptable impacts on the surrounding area.

Q9 – Has the planning proposal adequately addressed any social and economic effects?

The proposed development will result in positive economic and social flow-on effects for the local area. The residential component will deliver valuable housing in a location close to public transport, community facilities and jobs. The commercial ground floor areas will contribute to integrating the site with the surrounding town centre locality. In addition, the development will result in the creation of jobs throughout the construction process and once operational. The development would also provide additional Section 94 contributions for services and infrastructure in the area.

Overall, the proposal will support the implementation of the Strathfield Town Centre Master Plan and the successful integration of new housing and employment opportunities within a socially diverse region.

9.2.4 State and Commonwealth Interests

Q10 – Is there adequate public infrastructure for the planning proposal?

The site is in an established urban area and has access to a range of existing services and public infrastructure, including public transport. Further investigations will be undertaken as part of the preparation of the DA material to determine whether any upgrade of existing facilities is required.

Q11 – What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?

State and Commonwealth authorities will have the opportunity to provide comment on the Planning Proposal as part of its formal exhibition. Any future DA will be referred to the relevant authorities as required.

9.3 Part 4 – Mapping

The proposed amendments to the Strathfield LEP 2012 will require changes to the LEP Maps. The current Strathfield LEP 2012 controls and proposed amendments are shown in **Table 18** and **Figure 24** to **Figure 27**.

Table 18 – Strathfield LEP 2012 Map Amendments

Sydney LEP 2012 Map	Current	Proposed
▪ Floor Space Ratio	▪ 3.5:1	▪ 5:1
▪ Building Height	▪ 35m	▪ 54m

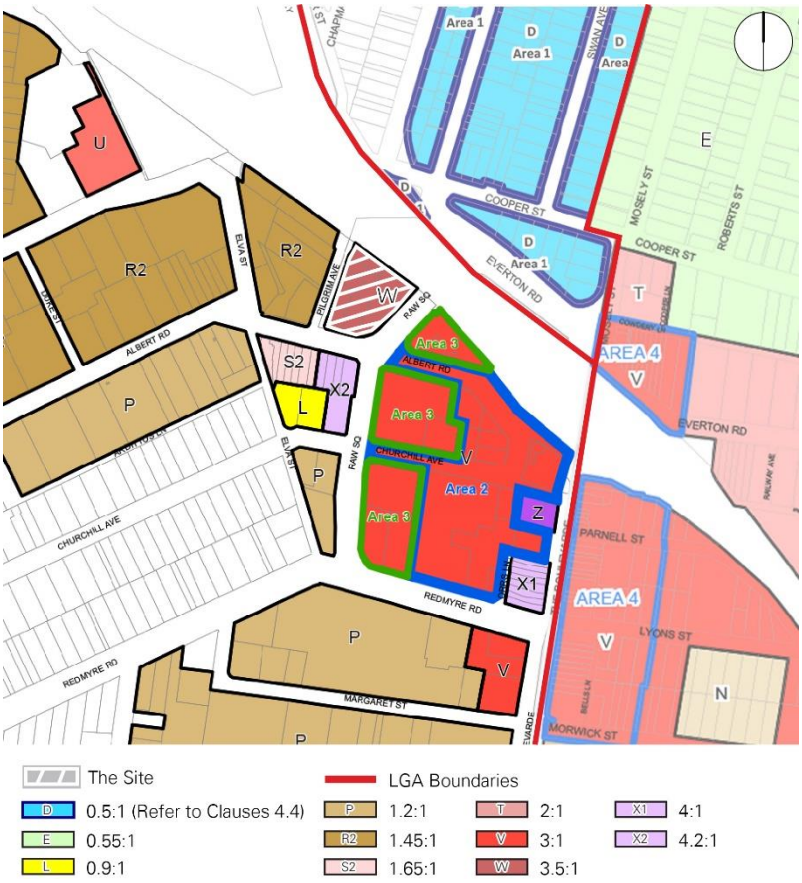

Figure 24 – Current Floor Space Ratio LEP Map

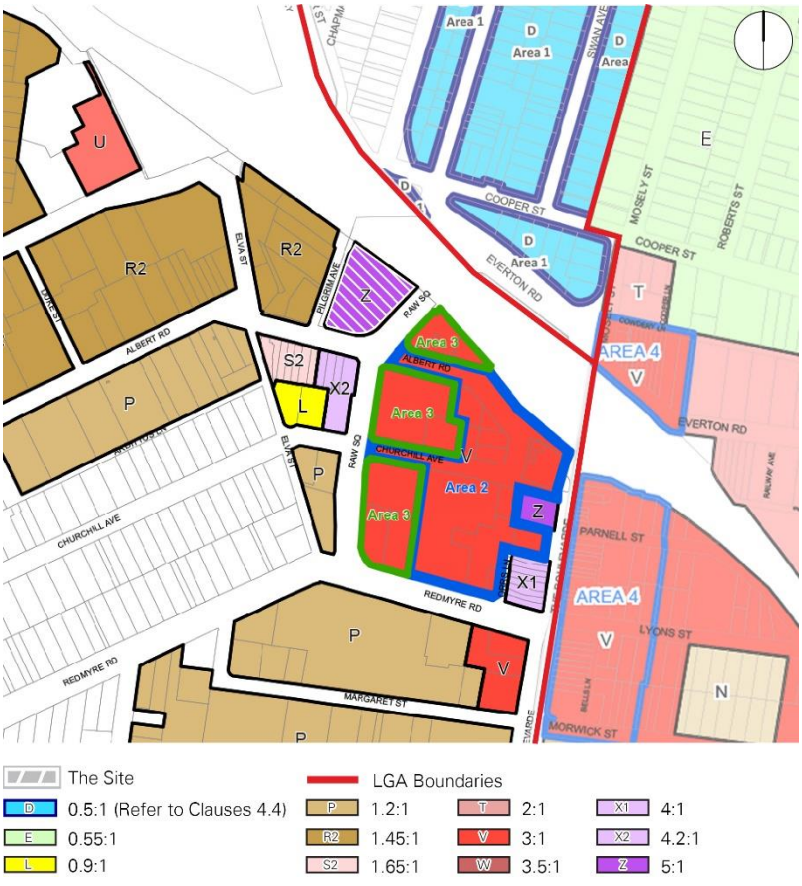

Figure 25 – Proposed Floor Space Ratio LEP Map

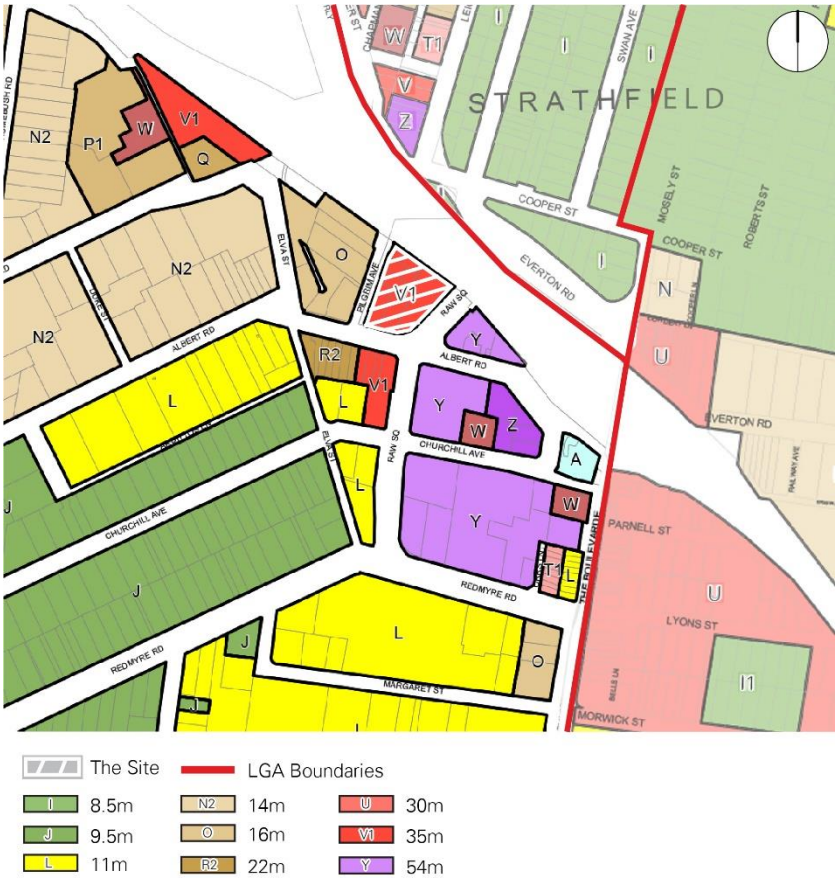

Figure 26 – Current Building Heights LEP Map

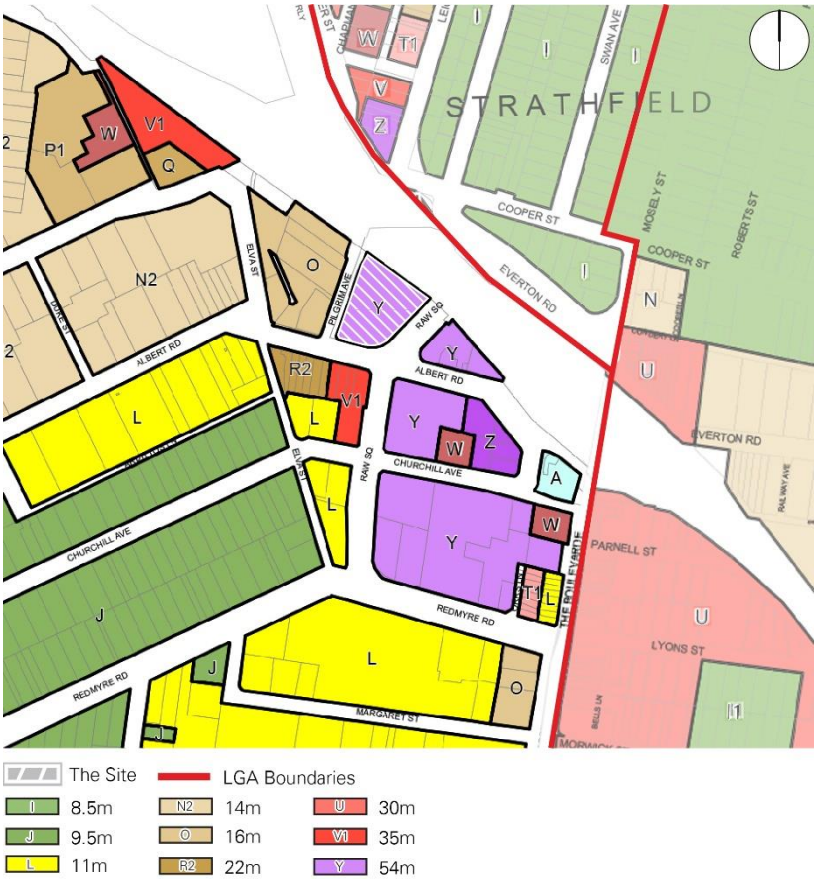

Figure 27 – Proposed Building Heights LEP Map

9.4 Part 5 – Community Consultation

This Planning Proposal will be publicly exhibited as per Sections 56(2)(c) and 57 of the EP&A Act for a period of 28 days. Consultation will also be undertaken with a number of public authorities as required.

Any future DA for the site would also be exhibited in accordance with Council requirements, at which point the public and any authorities would have a further opportunity to make comment on the proposal.

10.0 Conclusions and Recommendations

As highlighted in this report, due to Sydney's ever increasing population and the significant and unprecedented need for housing delivery to 2031, the State Government has unequivocally outlined its priority to achieve housing growth through urban renewal of strategically well located sites in close proximity to public transport, amenities, services and facilities.

Transit oriented development, whilst not a new concept, is becoming more and more prominent in Sydney with centres such as Chatswood, St Leonards, Epping, and Hornsby, and is now a demonstrated successful model for achieving high density living and creating vibrant suburban and strategic centres, with the draft Central District Plan supporting the development of transit-oriented development sites. As pointed out in this report Strathfield town centre has the benefit of a major railway station which services several lines and provides various connections to other part of Sydney including Parramatta and the CBD. Maximising the use of land surrounding the train station therefore should be a high order strategic priority for Strathfield Council as this will significantly help to contribute to the achievement of housing targets as outlined in the draft District Plan whilst also assisting with the regeneration of the town centre.

The general area around the subject site is undergoing significant levels of revitalisation, with planning controls reflecting the areas important standing as a key centre. The three key areas identified for future development – the Columbia Precinct, the Strathfield Triangle and the Strathfield Town Centre – generally seek to focus higher buildings towards the rail corridor to act as visual and acoustic buffers for future residents. The subject site acts as a key link between these areas, and height and floor space ratio of development on the site should reflect this accordingly. Additionally, the location of the Strathfield Railway Station provides a key focal point and transport interchange which would support the development of higher density residential form.

Taking the above into consideration the current LEP controls for the site and wider town centre are conservative and prohibit the site and the wider town centre's from realising its ability to accommodate growth and development.

This Planning Proposal seeks changes to the height and floor space ratio controls affecting the subject site at 2-6 Pilgrim Avenue, 9 Albert Road and 11-13 Albert Road, Strathfield. Specifically, it seeks to:

a) increase the maximum height limit for the site from 35m to 54m; and

b) increase the maximum floor space ratio for the site from 3.5:1 to 5:1

As illustrated in the indicative scheme prepared by Kennedy Associates Architects these changes will enable the site's future regeneration as a new high quality residential led mixed-use development.

The proposed planning control amendments will expedite and facilitate the achievement a number of strategic planning, urban design and amenity benefits including, but not limited to:

- Contributing to achieving important goals, directions and actions of A Plan for Growing Sydney including provision of housing growth and in particular its delivery in a highly strategic location that is well serviced by infrastructure, transport, education, recreation and centres of employment;
- Provide the opportunity to retain a portion of non-residential land uses on the site;
- Delivering new temporary and permanent job opportunities;

- Improve the site's contribution towards the Strathfield Town Centre and the overall quality of built form in the local area;
- Reinforce Strathfield Town Centre's role as a key business, social, cultural and residential focal point in the LGA;
- Activation of the street;
- Deliver a high-quality environment for residents in accordance with SEPP 65 and the Apartment Design Guide;
- Continuity of the development corridor from the Strathfield Town Centre, to the Strathfield Triangle and Columbia Precinct while focussing development on the existing rail corridor; and
- Maximising the re-use of a well-located brownfield site for urban infill development whilst minimising adverse environmental and amenity impacts on the existing surrounding buildings.

Considering the above the planning proposal is consistent with relevant strategic and statutory planning documents and will deliver a number of demonstrable public benefits. An environmental assessment of the impacts of the proposed built form facilitated by the planning proposal has also been undertaken and it demonstrates that the planning proposal will not result in any unacceptable environmental impact.

Given the strategic planning merit of the proposed amendments, the applicant requests that Strathfield Council forward this Planning Proposal to the Minister for Planning for public exhibition, prior to the making of the Plan for gazettal.