

14469
28 October 2015

The General Manager
Holroyd City Council
16 Memorial Avenue
MERRYLANDS NSW 2160

Attention: Natalie Stanowski

**RESPONSE TO INFORMATION REQUEST
WENTWORTHVILLE MALL PLANNING PROPOSAL**

Dear Natalie,

I refer to Council's letter dated 2 September 2015 in which further information was requested in relation to Austino's Planning Proposal made for land located at 42 – 46 Dunmore Street, Wentworthville (the site).

Please find set out below our itemised responses to the issues raised in this letter.

It is noted that since the issue of this letter, council has released its draft Planning and Placemaking Strategy (the draft strategy) for the Wentworthville town centre (the town centre). It is encouraging to see that the draft strategy and Planning Proposal align in their intent to promote the revitalisation of the town centre. Importantly, due to its scale, the Planning Proposal will make a significant contribution to the delivery of many of council's key priorities for revitalisation identified in the draft strategy.

Issue 1A: Strategic merit – context

The current metropolitan strategy for Sydney, *A Plan for Growing Sydney* (the metropolitan strategy), breaks the city into 6 subregions. Wentworthville, along with the balance of Holroyd LGA, is included in the West Central subregion. Compared to the previous draft subregional strategies under the former metropolitan plan, the metropolitan strategy provides limited direction for centres, only identifying Parramatta and strategic centres such as Blacktown. Town centres such as Merrylands, Auburn and Wentworthville are not identified.

In the absence of such direction, regard is given to the strategic priorities relevant to centres within the subregion under the metropolitan strategy. The main centre based strategic priority for the West Central subregion is the promotion of the concept of a Greater Parramatta. To this effect, the metropolitan strategy states:

"Greater Parramatta will continue to be Sydney's second CBD and a focus for jobs growth and services delivery in Sydney's west. A growing and prosperous Greater Parramatta will be supported by a network of centres providing jobs and services closer to home for many of the subregion's residents".

A supporting network of centres is critically important to promoting the growth of Greater Parramatta. The current extent of Great Parramatta extends to include locations such as Westmead, which adjoins Wentworthville, and Camellia. However, we are of the view that a revised approach, which extends this footprint to also encompass the nearby centres of Merrylands (the centre for Parramatta's southern catchment), Granville (the centre for Parramatta's south-east catchment and Wentworthville (the centre for Parramatta's north-west catchment), and possibly even Auburn (refer to **Figure 1**) will deliver greatly

improved strategic benefit. With Parramatta identified as the key location for business, the population of surrounding centres should be optimised to provide a critical mass of new residents to support these business uses. We believe that with recent planning changes announced, including the formation of the Greater Sydney Commission and likely adjustments to council jurisdictions, this broader can be supported on the basis of strategic merit.

On this basis, development parameters for each of these supporting centres should be revised upwards to help promote and support the role of Parramatta as western Sydney's CBD.

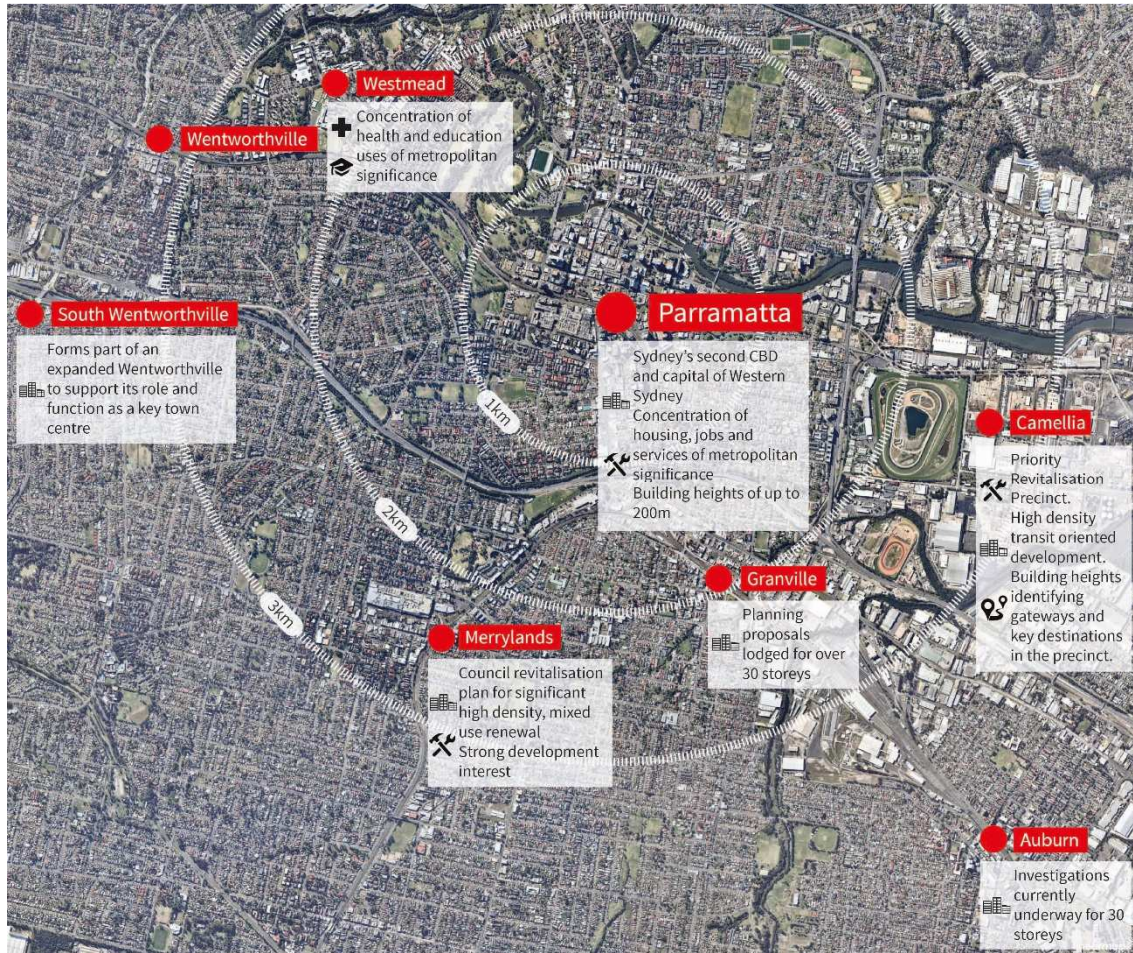


Figure 1 – Parramatta and surrounding centres

Council has also requested address of the former draft subregional strategies. From the outset it should be noted that their publication date of 2007 means that much of the underpinning research and analysis was formulated prior to this time, making it close to a decade old. This raises the question of the current relevance of the strategies. Secondly, they were largely informed by then council data and information, and received minimal oversight and review by the Department of Planning (now the Department of Planning and Environment). They were also never formally adopted, and have remained since their publication as draft documents.

The draft Subregional Strategy categorises centres in the subregion based on a "Centres Typology". This typology includes a number of designations, including town centres, village centres and neighbourhood centres.

Figure 2 shows all centres within the West Central subregion.

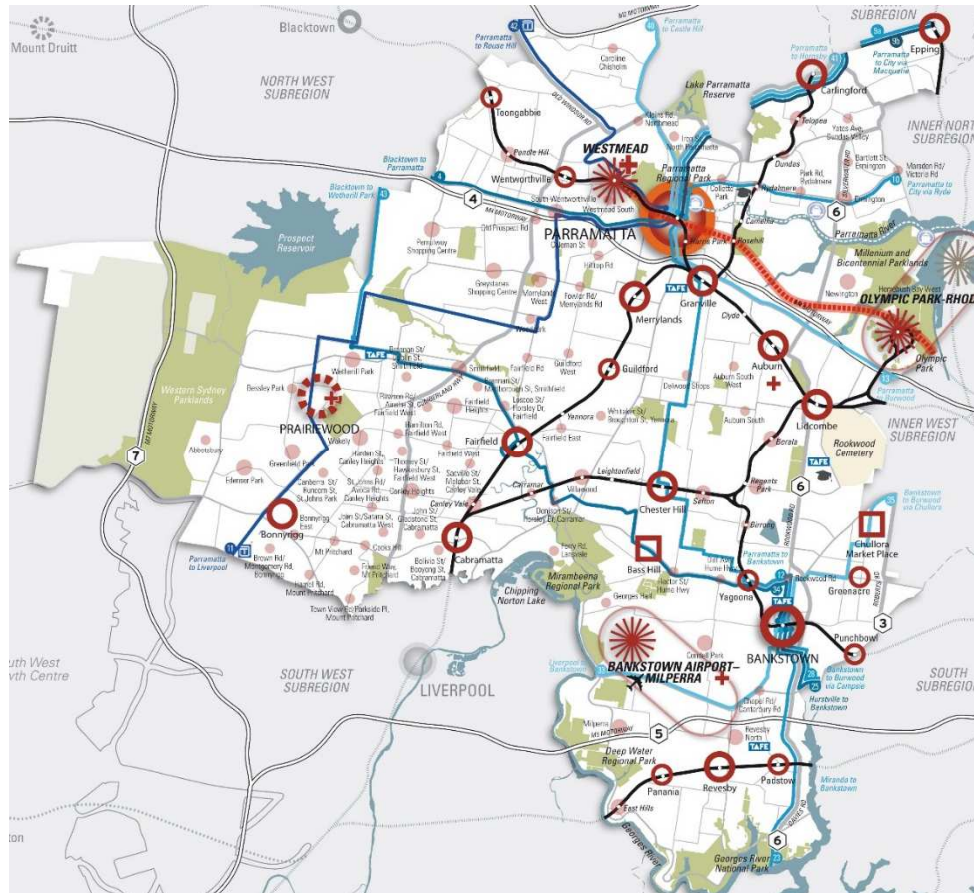


Figure 2 – West Central subregion centres under the draft Subregional Strategy (2007).

Wentworthville was identified as a Village Centre. However, driven by changing demographics and economic trends, the area surrounding Wentworthville was identified as being expected to grow, therefore elevating Wentworthville from a Village Centre to a Town Centre. This change is shown in **Figure 3**.

This change places Wentworthville in the same category as Parramatta's other supporting centres of Merrylands and Granville, as well as nearby Auburn and other rail based centres such as Epping and Lidcombe.

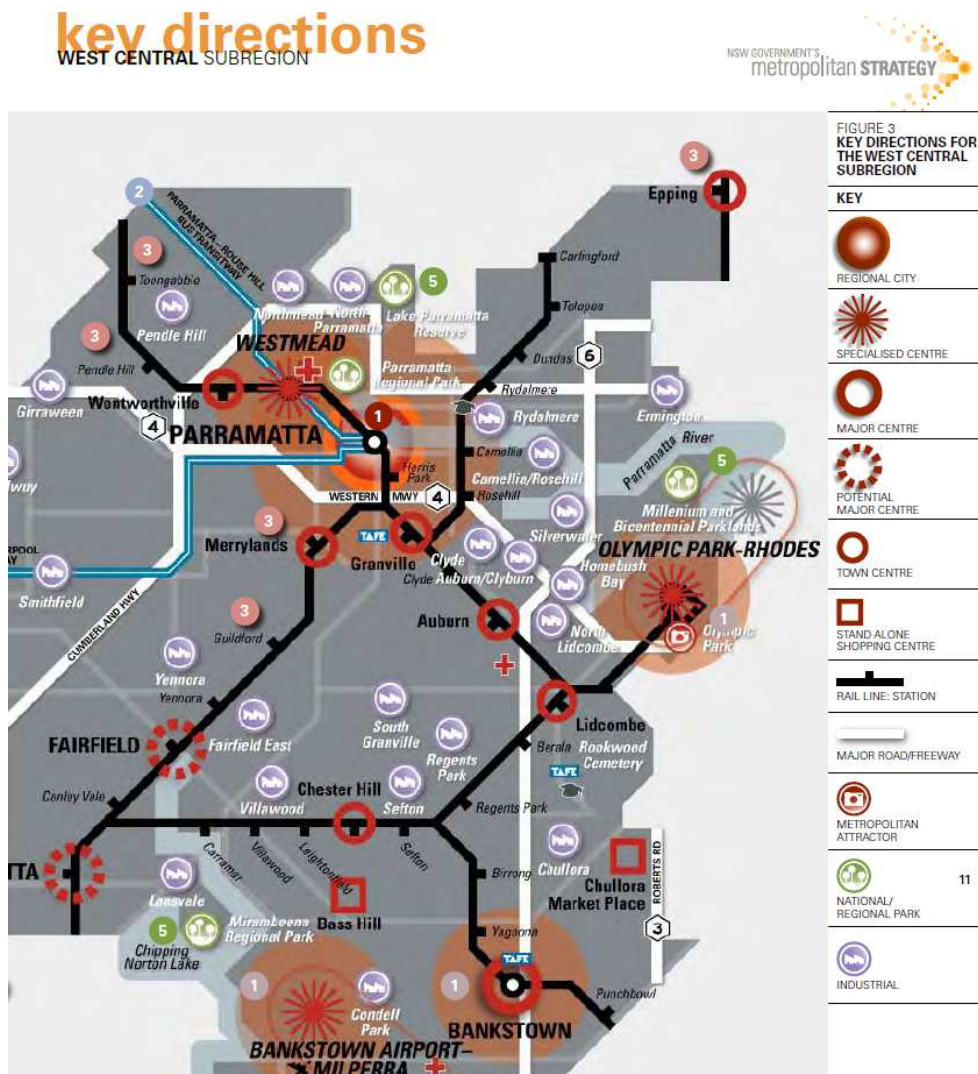


Figure 3 – Future network of centres under the draft West Central Subregional Strategy (2007).

Under the centres typology, town centres have the following key attributes:

- **Catchment area:** 800 m
- **Facilities:** one or two supermarkets, community facilities, medical centre, schools
- **Dwelling:** between 4,500 and 9,500 dwellings.
- **Role:** usually a residential origin than employment destination.

On this basis, comparison with planning frameworks for these centres is useful to inform the setting of appropriate, contemporary FSR and height controls for Wentworthville.

Figure 4 shows the existing and proposed FSR for Wentworthville in the context of surrounding centres. This figure clearly shows that under the current Holroyd LEP, FSR in Wentworthville is set substantially lower than that for other, nearby comparable centres. The increased FSR as sought by the Planning Proposal will recalibrate this FSR to bring it generally in alignment with centres for which more recent planning has been undertaken in order to incentivise their renewal. Perhaps most importantly for council, it is noted that FSR will remain lower than that set by council for the Merrylands town centre, thereby addressing concerns about impact on the centres hierarchy.

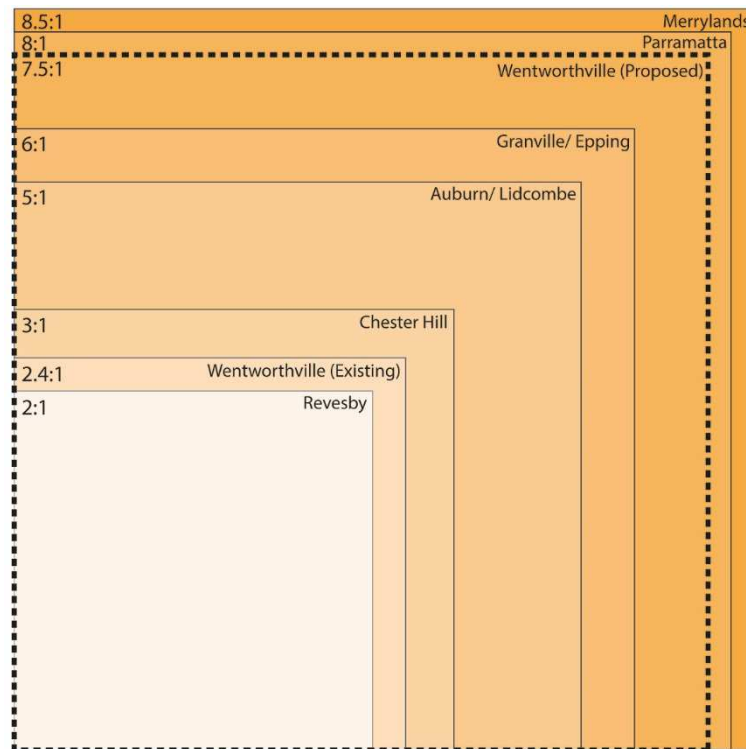


Figure 4 – FSR comparison

Key directions from recent and current planning investigations and proposals for comparable West Central subregion centres include:

- setting of a maximum height of 72 metres in the Epping Town Centre following conclusion of the Urban Activation Precinct process
- the submission of Planning Proposals by Parramatta City Council for land in and around the Granville Town Centres to the department to achieve heights of 96.6 metres, approx. 34 storeys (corner of Parramatta Road, Good Street and Cowper Street) and 105m, approx. 35 storeys (171 to 189 Parramatta Road)
- Auburn council is currently conducting a review of its FSR and heights controls for the Auburn and Lidcombe town centres, with height a particular issue for investigation.

Existing and proposed, or currently being considered, maximum building heights are shown in **Figure 5**.

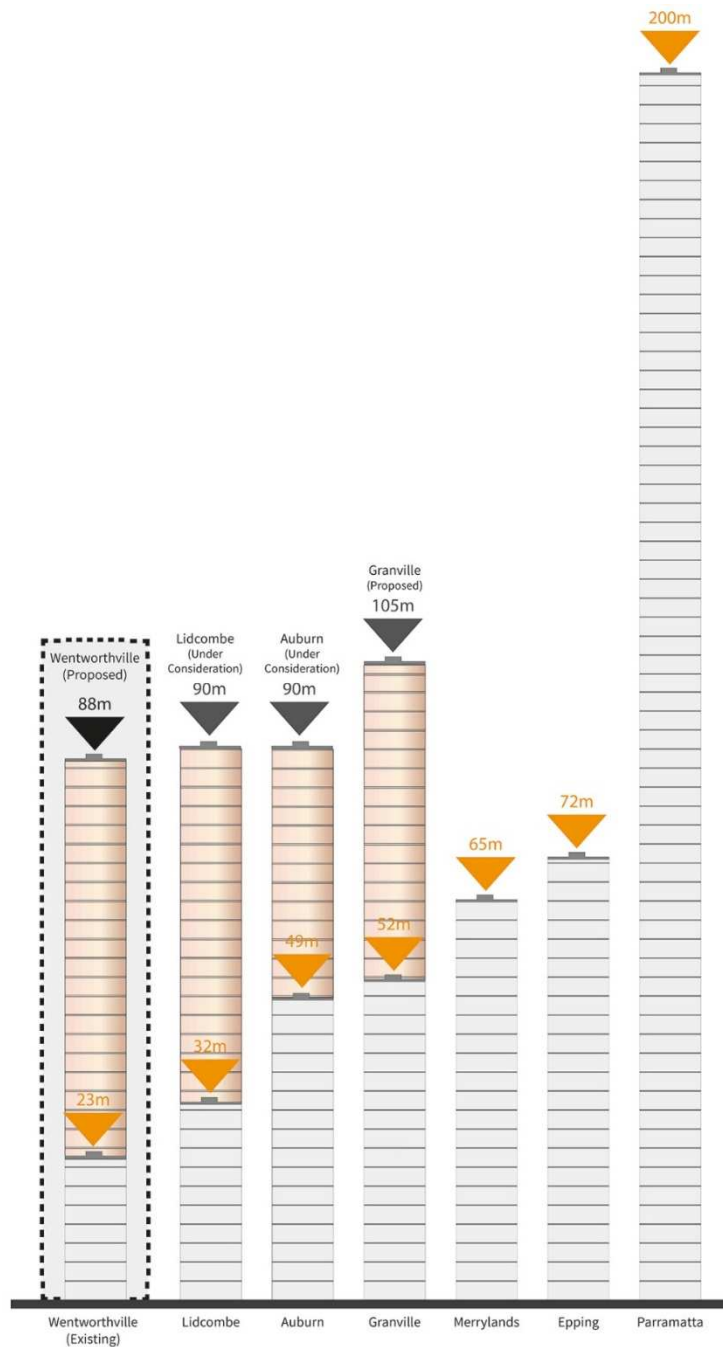


Figure 5 – Existing and proposed future heights for selected Central West Subregion Town Centres

In addition to the continued emergence of Parramatta as Sydney's second CBD and capital of western Sydney, since the date of publication of the subregional strategies, a number of key contextual changes have occurred that have influenced planning responses in Sydney. Principal amongst these include:

- accelerated, substantial population growth
- an increasing acceptance, and indeed preference in some cases, of apartment living
- increased market demand for housing in western Sydney
- increased land prices.

These drivers all support the more efficient utilisation of land through optimising FSR and height controls in rail based centres such as Wentworthville.

At the local scale, current and proposed height controls under the draft strategy, are predicated on two key notions:

- Wentworthville maintaining its current “village” character
- Wentworthville as being subservient to Merrylands in the centres hierarchy.

Due to the above noted contextual changes, Sydney is transitioning from a largely suburban to an urban city. To minimise urban sprawl, this growth needs to be accommodated in existing urban areas. However, not all urban areas have the capacity to accommodate growth. Some areas are affected by poor public transport accessibility, heritage, aircraft noise and other constraints. It is therefore incumbent on suitable locations, and in particular established rail based centres with minimal other constraints, to absorb most of this growth. This has been recognised now for a number of years in successive state government metropolitan plans for the city. This means moving away from notions such as retaining a “village” character that may have been valid a number of years ago under different circumstances, and changing the planning framework for these centres to accommodate significant density and height.

Although both town centres, Merrylands is the primary centre in the Holroyd LGA centres hierarchy, with Wentworthville the second centre. Under this hierarchy, for urban form and other purposes, it is logical that consideration of the relationship between Merrylands and Wentworthville occurs.

The proposed FSR of 7.5:1 is less than that the 8.5:1 allowed under the LEP for the Merrylands town centre.

Heights are also set lower for Wentworthville under the existing LEP and under the draft strategy than for Merrylands. However, Holroyd occupies a relatively small part of Sydney’s Central West region. Although in different LGAs, located close by are western Sydney’s CBD of Parramatta and other centres such as Auburn and Granville. It is argued that heights in the Holroyd LGA, and therefore Wentworthville, should be set on a sub-regional basis informed by proximity to Parramatta, and not a Holroyd specific basis. Maximum building heights in Parramatta are currently set at 200m. Heights should obviously be set lower than this. However, on balance of considerations, in particular the benefits that accrue by maximising density and height in rail based centres, it is argued that the existing heights for Merrylands and Wentworthville are too low, and should be revised upwards. Although council does not necessarily consider them to be “like for like”, the determination of what an appropriate height may be can be informed by other rail based centres. As was shown in the original Planning Proposal, this is now tending to be around the 25 – 30 storey mark. Assuming Merrylands will retain its role as a more significant centre than Wentworthville (largely by virtue of its retail and government facilities), this indicates 30 storeys is a generally appropriate height for this centre. Stepping down 5 storeys to 25 storeys as the maximum building height in Wentworthville is therefore appropriate, maintaining an urban form that signifies Merrylands as the greater of the two centres.

The appropriateness of the proposed FSR and height at an immediate scale can largely be determined by an assessment of its likely impacts. The preferred development scenario has been intentionally and carefully designed to reinforce the sites landmark status within the town centre while at the same time minimising impacts on neighbouring and nearby development. This is in particular demonstrated through solar access and visual privacy diagrams located in later parts of this letter.

On this basis, we believe that a maximum height of 25 storeys and a maximum FSR of 7.5:1 is appropriate and justified with reference to metropolitan, subregional and local contexts.

Issue 1B: Strategic merit – economics and feasibility

Economic considerations are most appropriately framed in the context of:

- feasibility vs incentivising redevelopment
- the current market and cross-subsidisation

- value of the public benefit delivered by the additional yield enable by the Planning Proposal, including the extent of value capture
- the contribution in s94 funds the proposal will provide to council, which can also be allocated to public benefit purposes in the town centre.

Hill PDA has also undertaken additional investigations to address this issue, the results of which are summarised in this section, with the full findings provided at **Appendix A**.

Feasibility versus incentivising redevelopment

To inform development of its draft strategy, Council commissioned a number of technical specialist studies, including an Economic and Development Feasibility Assessment. This assessment confirms that redevelopment of the site is not financially attractive in the current market under the existing planning controls. The assessment also states that an increase in FSR and building height improves the viability of development. Expanding on this, the assessment further states that larger, less fragmented sites generally become viable for redevelopment with an FSR exceeding 3:1. However, the assessment also states that an FSR notably in excess of 3:1 would be required for the redevelopment of sites should additional public benefits such as open space, community uses and pedestrian passageways be provided.

There is a substantial difference between feasibility, which infers something can potentially be done, and incentivising development to maximise its likelihood of happening. The difference between the two usually involves a range of factors, however is most strongly influenced by setting planning controls that acknowledge site specific parameters. The Mall site, which supports a viable retail centre, currently returns a profit to its owners. To cease this profitable venture, obtain required development approvals, remove existing buildings and structures, construct new development and undertake all associated activities such as marketing and sale, involves substantial cost. In addition, Austino is seeking to provide a range of tangible public benefits as part of redevelopment, including a series of public plazas and community use floor space. To offset these costs, FSR and heights need to be able to deliver sufficient return to justify this change. FSR and heights under the existing Holroyd LEP, as well as those proposed under the draft strategy, do not act as a sufficient incentive to Austino to catalyse this change. An FSR of 7.5:1 and a height limit of 25 storeys does however provide this incentive to develop now.

Due to the typical cyclical nature of the property market, the current strength of the residential property market in Sydney, and in particular the West Central subregion, is not guaranteed to continue. Indeed, there have been recent indications that demand may be starting to weaken. Given the reliance on residential product to deliver the much needed full line supermarket and desirable commercial space, a downturn in this market risks these items being delivered. The Planning Proposal therefore represents a unique, yet time limited, opportunity to catalyse renewal of the town centre.

By facilitating redevelopment of the site through revised planning controls, tangible public benefits will actually be delivered and delivered early, as opposed to relying on smaller development sites that less afford to provide a high standard of community benefit and require time to amalgamate or obtain sufficient capital to redevelop. This will in turn act to catalyse further redevelopment of the town centre, and will mark a strong show of support and confidence from the landowner and development community in council's ability to deliver a revitalised town centre and contribute to alleviating Sydney's growth challenges.

The current market and cross-subsidisation

The current property market in Sydney very much favours delivery of residential product. Outside of the Sydney CBD and other major pre-existing employment clusters there is minimal demand for large scale, non-retail employment uses that are suited to town centre contexts, such as commercial office space.

As such as it is expected that residential space will have end sale values commencing around \$7,500/sqm. First floor commercial space will be 40% to 50% below this value based on a net effective rent of \$275 to \$325/sqm and a capitalisation rate of 7.5% to 8.0%. Commercial space is no less expensive to build than residential. Hence commercial space is not viable in isolation and it requires a

considerable level of residential space to cross-subsidise it. The additional 122 apartments on the subject site substantially improves the viability of providing commercial space on the first floor.

Value of public benefit

Hill PDA has investigated additional yield enabled by the proposed FSR and height compared to that proposed under the draft strategy, and what this translates to in terms of community benefit. Compared to the draft strategy, the Planning Proposal will deliver an estimated additional floor space that translates to the equivalent of 122 apartments. Using an average of \$65,000 per apartment, this results in an uplift of \$7.95m.

Table 1 identifies the value of the bonus floor space to the development and the value of the public benefits provided by the Planning Proposal that Hill PDA believes is appropriate.

Table 1 – Value of the public benefits provided by the Planning Proposal

	No.	Units	Rate	Total
Value of Floor Space Bonus	122	Units	65,000	7,949,000
Value of Public Benefits				
Value of Ground Floor Airspace ¹	2,570	Sqm	1,150	2,956,000
Embellishments @ say ²	2,570	Sqm	1,100	2,827,000
Commercial Space Gifted to Council ³	600	sqm	4,516	2,710,000
Dunmore Street Crossing		Item		100,000
Total				8,593,000
Percentage Capture of Added Value				108%

¹ Based on market research. Refer to the Hill PDA report "Social and Economic Benefits Assessment", February 2015

² Includes public domain works and finishes such as security, paving, lighting, furniture, public art, etc

³ Based on a market rent of \$350/sqm by 7.75% capitalization rate

As shown in **Table 1**, the total value of community benefit amounts to close to \$8.6m. The ratio of value capture (value of public benefits to value of bonus floor space) is 108% which is more than double a generous target rate of 50%.

Section 94 contributions

Without any negotiated rebates the 122 bonus apartments would generate \$1.68m in Section 94 contributions (based on the equivalent of 122 x 2-bedroom apartments at \$13,774 each under Council's Section 94 Plan 2013 indexed to June 2015). This provides a large amount of additional funds at no expense to council or ratepayers that can be used toward the provision of key infrastructure upgrades in the town centre.

Issue 1C: The role of the site in the Wentworthville centre and suitability of proposed retail and commercial floor space

Demand modelling undertaken to inform council's draft strategy suggests that the town centre would benefit from an anchor tenant in the form of a full line supermarket (4000m² +). The community also identified a desire for a major retail tenant within the town centre.

Economic feasibility investigations undertaken to inform council's draft strategy also suggests there is demand for commercial office space, if competitively priced, particularly in locations around the railway station.

The draft strategy notes that due to proximity to Westmead, there is the presence of a number of medical related businesses within the town centre. The strategy also states that revitalisation of the

town centre presents an opportunity for this sector to grow. With business synergies, this has the potential to position the town centre as a key centre for medical related services, which can provide a solid platform for attracting people to the town centres and for subsequent future economic growth.

The town centre has a predominantly fragmented lots pattern, with a large number of small, deep lots that are not conducive to accommodating a large scale retail use such as a supermarket. Consistent with this constraint, along with the library and function centre site on Lane Street, the site was identified as one of only two sites in the town centre having suitable capacity to contain a supermarket. As the draft strategy proposes redevelopment of the Lane Street site for community uses, the site was identified as the most suitable location to accommodate a supermarket by the economic feasibility and urban design study and built form modelling, and the draft strategy designates the site for this purpose. In addition to its size, the site is strategically located in the geographical centre of the town centre, centrally located on the main retail street and is highly accessible to the rail station (with further accessibility improvements to occur as part of the council proposed Kingsway pedestrian link). On this basis, the ground floor plan of the development concept has been amended to include a full line, 4,000m² supermarket (refer **Appendix B**).

In addition to a full-line supermarket, the preferred development concept facilitated under the Planning Proposal also includes supporting small tenancy retail premises aligned with pedestrian movement corridors and commercial office space in a location proximate to the rail station which will be of a size and configuration suitable for medical and related uses.

The Hill PDA report titled “Wentworthville Town Centre Revitalisation Project” April 2015 demonstrated the potential for Wentworthville to improve its retail offer and its trading performance given an appropriate retail mix and intensification of housing in and around the centre. The report identified the primary trade area (PTA) as an area of 1km to 1.5km around the subject site, although its southern boundary is likely to follow Bennett Street given the presence of the Woolworths supermarket in South Wentworthville. This PTA currently houses around 11,000 people – a population already sufficient to justify a full line supermarket.

BTS forecasts an additional 3,865 people in the PTA from 2011 to 2031, of which only 235 would be in the town centre. Council’s strategy proposes 1,800 more apartments in the town centre which will house around 3,800 to 3,900 people. This is some 3,600 more than forecast by BTS. It’s likely that by 2031 there will be around 18,000 people living in the PTA – some 7,000 more than the current level. This is a population that potentially could support two full line supermarkets, although it’s likely that there will be some continued net escape expenditure.

To reduce the significant level of current net escape expenditure there needs to be an improvement in the retail offer. The addition of a full line supermarket will improve that offer considerably and arrest a considerable proportion of current escape expenditure, as will investing in public domain improvements funded by development to create a destination retail centre where people “linger” and spend a greater amount of money in.

The Hill PDA report titled “Wentworthville Town Centre Revitalisation Project” forecast demand for a total of 16,500sqm of occupied retail floor space in the town centre by 2026 – some 2,500sqm more than current levels. This is based on the assumption that an appropriate mix of retail offer is achieved including a full line supermarket. Council’s strategy will increase that demand further to more than 20,000sqm of retail space being required if all 1,800 apartments are built by then.

As a result, Hill PDA concludes that the impacts on existing retailers would not, as a general rule, be negative. Some existing retailers will be faced with added competition but many others will welcome the increase in number of shoppers. There may be a change of tenants where some existing tenants struggle against the increased competition. Nevertheless the centre as a whole will benefit from the combination of both an increase in population and a significant improvement in the retail offer.

The 122 additional apartments will house a further 270 people spending around \$3.4m on retail goods and services each year. With an improved retail offer Wentworthville would capture around half of this expenditure.

On this basis, the site is strategically located to deliver a much needed new full line supermarket, and will have a number of positive economic impacts on the town centre, largely driven by a critical mass of new residents and the broadening of the town centre's role as not only a local convenience centre but also as a destination retail centre.

Issue 2: Social Impact Assessment, including community consultation

Social impact assessment, including supporting community consultation, was undertaken on behalf of Austino by Think Planners in accordance with council's *Social Impact Assessment Policy* (August 2012).

Separate reports outlining the social impact assessment and community consultation are attached (**Appendix C** and **Appendix D**).

Key findings from the SIA include:

- the development will have a significant impact on the town centre
- it will redefine the role of the town centres, promoting its evolution to a leisure destination
- it will contribute to alleviating current housing shortages
- it will cater for a range of household types
- additional people housed in the town centre as a result of the Planning Proposal will improve business viability
- it will be supported by a range of community benefits, including new plaza and through block link, and will be located accessible to public transport and community facilities
- there is a clear nexus between the amount of additional floor space and the ability to provide social and community benefits
- the planning proposal as submitted is consistent with the expectations of the community as surveyed through the community engagement process that formed part of the SIA.

A number of key themes emerged from the community consultation undertaken. These themes included:

- support for the revitalisation of the town centre
- support for greater yield and height, subject to the provision of complementary community benefits such as new public plaza space
- a desire to see development happen over the short term.

This findings of the SIA and the community engagement in relation to community expectations is important. Council's draft strategy does not promote a dominant podium and tower built form typology or widespread taller buildings on the basis that this are inconsistent with community expectations. A key informant of these expectations were the workshops that formed part of the basis for the draft strategy. While shown examples of such development typologies as part of workshop exercise 2, it is unlikely that participants were able to fully understand how this development form would work holistically within the town centre, appreciate nuances such as how the placement of orientation of towers can maintain a human scale street wall and comfortable public domain or fully understand the relationship between yield, as enabled by greater FSR and height, and the delivery of key public benefits. These were explained to attendees of the Think Planners community consultation events, providing them with the requisite level of information to make informed decisions. The resultant level of acceptance and support for greater FSR and height is likely due to this, as well as the detailed level of resolution that supports the planning proposal that is not possible with generic (eg as shown at the workshops) or broader precinct wide examples (eg as shown as part of the draft strategy).

In any event, 44% of people who completed the online survey indicated that one of the top three issues facing Wentworthville is the lack of development, and some of the recorded comments from the

workshops show that there are levels of support for taller buildings, as evidenced by the following comments:

- *"Like the buildings that are slimmer and higher. More density will bring more life to the area, particularly on the street which is the ultimate goal. Suitable as it is near the train station."*
- *Too low rise, have already got this type of development in Wentworthville and it is no drawcard.*
- *Likes promoting a mix of buildings heights with old and new. There must be a place to accommodate increases in population, which should be in prime areas such as centres"*

Although a detailed breakdown of participants at the workshop and those who completed the online survey was not provided, details of respondents to the online survey were. It is interesting to note the age breakdown of participants, which included:

- a high proportion of respondents aged 50-64 (35%) compared to the demographic profile of the area (15%)
- 52% of respondents older than 50 years
- 16% response rate from participants 20-34 years of age compared to the 26% that reside in Wentworthville according to Census 2011

In general, older participants at community consultation events typically tend to be more conservative in their viewed towards change and renewal, and on this basis it can be reasonably expected that the results of the survey are skewed towards a lesser level of change that what would be the case with a larger proportion of younger respondents.

Issue 3: Maximum building height and FSR maps

In accordance with this request, maximum building height and FSR maps are located at **Appendix E**, and **Appendix F** with a snapshot shown in **Figure 6**.

The maximum building height map will amend existing *Height of Buildings Map - Sheet HOB_005* of the LEP to establish a maximum building height for the Dunmore Street part of the site of 90m and for the Pritchard Street part of the site of 55m.

The maximum FSR map will amend existing *Floor Space Ratio Map Sheet FSR_005* of the LEP to establish an FSR for the site of 7.5:1.

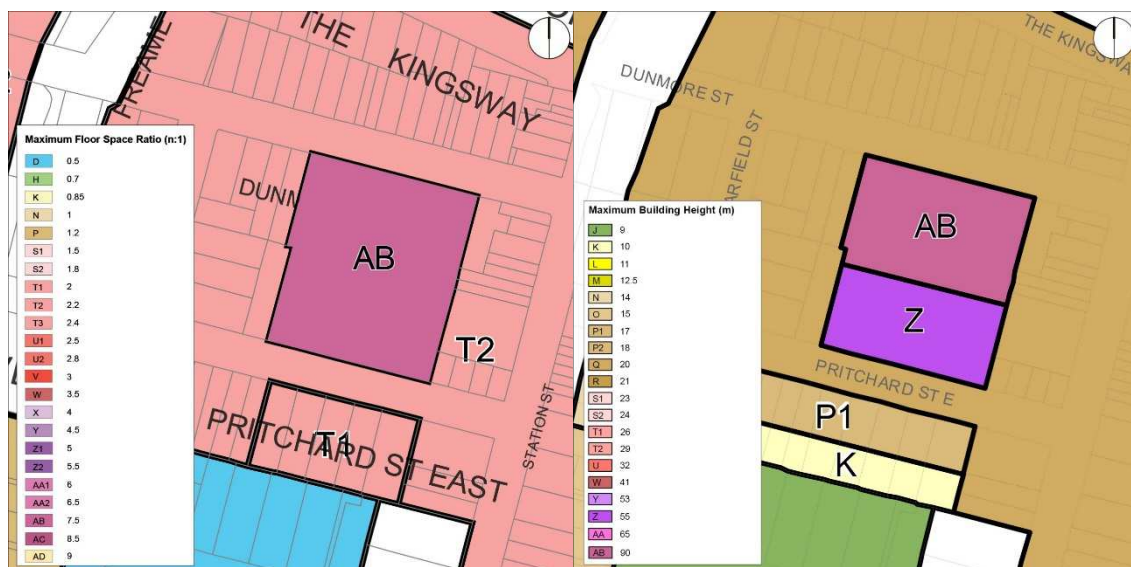


Figure 6 – Proposed FSR and height

Issue 4A: Address of Clause 4.3 of Holroyd LEP 2013

The objectives of clause 4.3 of the LEP are as follows:

- a) *“to minimise the visual impact of development and ensure sufficient solar access and privacy for neighbouring properties,*
- b) *to ensure development is consistent with the landform,*
- c) *to provide appropriate scales and intensities of development through height controls”.*

Visual impact, solar access and privacy were addressed in the original Planning Proposal.

Building height is a key aspect in the design of legible urban form that demarcates places or areas of relative importance. The proposed building heights reflect not only the importance of Wentworthville in the Holroyd LGA centres hierarchy and its emerging role as a key support centre for Greater Parramatta, but also the landmark status of the site itself.

PTW has prepared a number of drawings to understand the impacts of the proposed building height, massing and form on the existing and likely future Wentworthville town centre streetscape. These drawings illustrate that under a realistic and feasible future development scenario, the majority of the development would be screened from view from pedestrian level at key locations on the main streets of Dunmore Street and Station Street. It is only when viewed from afar, or close up, that the development would assert its visual significance as a marker element for the town centre.

The siting and design of buildings has been intentionally planned to both signify the importance of Dunmore Street as the town centre’s main street and to minimise impact on land outside of the town centre on McKern Street. The resulting staggering of height from north downwards to the south and the orientation of the long face of towers running north-south minimises impact on this land. The perpendicular orientation to the east-west street grid also means that shadows move quickly across land to the south meaning land outside the town centre will not be unreasonably in shadow in mid-winter.

The distribution of the towers to the corners of the site, their separation and focussing around the generous civic plaza provides for a number of amenity benefits, including solar access natural ventilation and views.

It is intended that the development will also be modulated, articulated and detailed to further reduce the appearance of building mass through the use of recesses and projections such as balconies, and expressive roof form and the use of varied but compatible colours, materials and textures.

Solar access and shadow analysis studies undertaken on the winter solstice demonstrate that high levels of solar access are achieved by the proposed development irrespective of the proposed future developments located on adjacent sites. With respect to overshadowing of adjoining uses, the studies show that between 9am and 12pm, the proposed development casts some additional shadow on the existing low density residential precinct to the south of the town centre, however the siting and orientation of the towers results in this effect being fast moving, and largely passes by midday. The shadows cast by the building will not impact the ability of these surrounding dwellings to achieve a minimum of 3 hours of direct solar access.

During the equinox months (September and March) which are generally representative of the average annual solar condition, overshadowing of the residential precinct to the south outside of the town centre does not occur.

Shadow diagrams are shown in **Figure 7**.

WINTER 21ST OF JUNE

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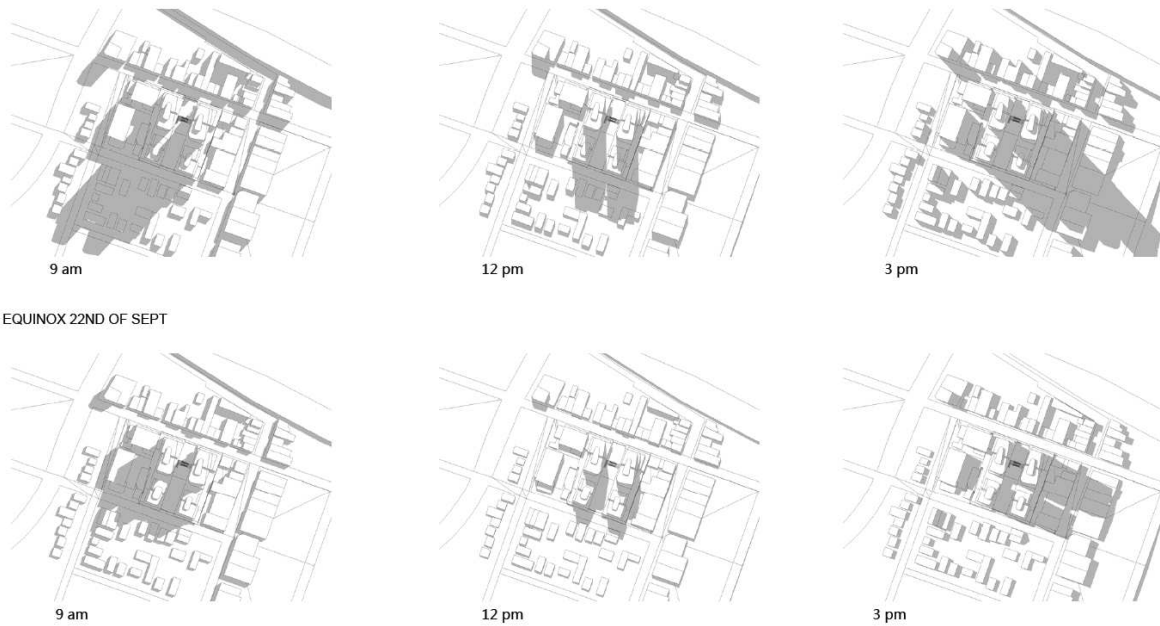


Figure 7 – Shadow diagrams

Under council's draft strategy, adjoining buildings to the east and west are to largely take a perimeter block form, presenting their long face, and therefore most habitable rooms, to the street or internal to the site. Only the ends of perimeter blocks will be located close to development on the site. This can be evidenced by recent approved development on the adjoining 46 – 48 Dunmore Street which has this form of layout and design.

PTW has prepared approximate building massing for adjoining sites informed by council's draft strategy to show separation distances, as the key indicator of appropriate visual privacy. These setbacks are shown in **Figure 8**.



Figure 8 – Separation distances relative to hypothetical adjoining development scenarios

Although under the current zoning and supporting DCP, nil setbacks are required. However, the setbacks achieved by the preferred development scenario demonstrates a closer alignment to the requirements of the Apartment Design Guide

The site has a slight level change, falling over 2m from its Pritchard Street frontage to its Dunmore Street frontage. The preferred development concept resolves this change, as well as providing a through block link and sufficient area for a full line supermarket, through its transition between the public open spaces of Civic Plaza and Pritchard Plaza. Alternative schemes that do not use this transition method to resolve the grade difference will struggle to provide a properly resolved through block link as well as a full line supermarket.

As noted before, Wentworthville is an ideal location for optimising FSR and heights to cater for Sydney's sustained and substantial population growth and provide local economic and social benefits. Furthermore, the staggering of heights across the site provides an appropriate scale and intensity of development relative to local context, in particular minimising adverse impacts on established lower density housing to the south of the site.

Issue 4B: Address of Clause 4.4 of Holroyd LEP 2013

The objectives of clause 4.4 of the LEP are as follows:

- a) to support the viability of commercial centres and provide opportunities for economic development within those centres,*
- b) to facilitate the development of a variety of housing types,*
- c) to ensure that development is compatible with the existing and desired future built form and character of the locality,*
- d) to provide a high level of amenity for residential areas and ensure adequate provision for vehicle and pedestrian access, private open space and landscaping.*

As has been demonstrated in response to issue 1C, the 122 additional apartments in part enabled by greater FSR the Planning Proposal will house a further 270 people spending around \$3.4m on retail goods and services each year. With the improved retail offer under the Planning Proposal and complementary council initiated and developer funded public domain improvements, it is estimated that Wentworthville would capture around half of this expenditure, better supporting the viability of the centre and providing further opportunities for economic development.

Hill PDA confirms this, noting that the town centre as a whole will benefit from the combination of both an increase in population and a significant improvement in the retail offer.

Greater FSR will also lead to the provision of a greater number and greater choice of new dwellings.

As has been noted before, while a step forward, the proposed future character set for the centre by council's draft strategy does not fully optimise the opportunity presented by Wentworthville as a rail based centre largely free of significant constraints to accommodate Sydney's sustained population growth. Planning for a future character that is consistent with that set by the Planning Proposal does optimise this opportunity.

The proposed FSR enables a development concept that achieves high levels of residential amenity as measured against key Apartment Design Guide (ADG) criteria, and provides adequate provision for vehicle and pedestrian access, private open space and landscaping.

On this basis, the additional FSR provided by the Planning Proposal realises the strategic opportunity of the town centre to accommodate growth, and is positively correlated with additional benefits to the town centre through additional residents and workers.

Issue 5: Blanket approach of mapping height

As noted in response to issue 3, the maximum building height for the Pritchard Street part of the site has been reduced from 88m under the original Planning Proposal to 55m. This represents a significant (33m) reduction in height between this and the Dunmore Street part of the site, and as such achieves council's objective for a height transition between the two parts of the site consistent with the preferred development concept.

Issue 6: Detailed floor space testing

Gross building area (GBA) and gross floor area (GFA) comparisons per floor are provided in **Table 2**.

Table 2 – GBA vs GFA

Level	Gross Building Area	Gross Floor Area
Lower ground	7,678	4,483
Upper ground	6,385	4,967
L1 – L2	5,127	4,106
L3 – L6	3,736	3,035
L7 – L14	3,124	2,500
L15 – L24	1,788	1,444
Total	82,133	64,242

On this basis, the GFA represents 78% of the GBA.

FSR has been calculated in accordance with clause 4.5 of the LEP, having particular regard to the definition of Gross Floor Area in the Dictionary of the LEP as follows:

“Gross floor area means the sum of the floor area of each floor of a building measured from the internal face of external walls, or from the internal face of walls separating the building from any other building, measured at a height of 1.4 metres above the floor, and includes:

- (a) the area of a mezzanine, and*
 - (b) habitable rooms in a basement or an attic, and*
 - (c) any shop, auditorium, cinema, and the like, in a basement or attic,*
- but excludes:*
- (d) any area for common vertical circulation, such as lifts and stairs, and*
 - (e) any basement:*
 - (i) storage, and*
 - (ii) vehicular access, loading areas, garbage and services, and*
 - (f) plant rooms, lift towers and other areas used exclusively for mechanical services or ducting, and*
 - (g) car parking to meet any requirements of the consent authority (including access to that car parking), and*
 - (h) any space used for the loading or unloading of goods (including access to it), and*
 - (i) terraces and balconies with outer walls less than 1.4 metres high, and*
 - (j) voids above a floor at the level of a storey or storey above”.*

It is noted that council as a general rule uses an efficiency ratio of 50% for commercial / retail floors and 75% for residential floors. The 78% efficiency rate is generally consistent with the upper limits of this range, and has been determined based on actual analysis of the proposal rather than the application of a general rule of thumb.

Issue 7: VPA heads of agreement

In accordance with this request, a draft VPA heads of agreement is located at **Appendix G**.

The heads of agreement offers a number of tangible community benefits for the Wentworthville community, including:

- 600 m² of commercial space to allow flexible uses by Council, residents and/or community members outside the development
- approximately 2,570m² of public open space comprising:
 - 683m² in the form of Wentworthville Town Plaza
 - 593m² in the form of the Forecourt Amphitheatre

- 1,294 m² in the form of Pritchard Square
- embellishments to public open space as follows:
 - CCTV cameras monitored by centre management
 - Paving
 - Lighting
 - public art
 - free Wi-Fi
 - smart phone/iPad connectivity
 - provision for events –power, water, sound systems
 - street furniture
 - landscaping
 - elevated pot plants
 - public notice board
- space for professional consulting rooms suitable for medical and hospital services
- subject to RTA and council endorsement, a road crossing at Dunmore Street including;
 - surface paving
 - traffic calming
 - fencing on both side sides of the street.

Austino proposes to negotiate the details relating the provision of the on-site community infrastructure, post Gateway Determination and during the assessment of the Planning Proposal when it is with the Department of Planning and Environment.

Issue 8: Community facility

It is proposed a flexible, multi-purpose space having a floor area of 600 m² for use by Council, residents and/or community members.

Council preferred community facility (a childcare centre) is unsuitable for the site, as its accommodation will either require entire internalisation within the podium with the absence of outdoor play space or location on the roof of the podium using a long, narrow strip of podium terrace along the edge of the site for outdoor play space. This second configuration in particular has a number of adverse impacts, both on child care centre and residents, with inadequate solar access, overlooking of the child care facility and the generation of noise impacts that will affect residential uses during operating hours.

As noted in response to item 7, Austino proposes to negotiate the details relating the provision of the on-site community infrastructure, post Gateway Determination and during the assessment of the Planning Proposal when it is with the Department of Planning and Environment.

Issue 9: Traffic report

Trip distribution percentage adopted in the traffic report was based on 2011 journey to work data of the Wentworthville area (specifically travel zones 1006 and 1010).

However, the following arrival (**Table 3**) and departure (**Table 4**) patterns have been provided by the Council and as requested, these patterns will be applied to the development generated traffic. It is noted that Council has provided traffic distribution percentages for weekday AM and PM only. GTA has reviewed these percentages against the traffic flows presented in Wentworthville Town Centre, Traffic and Transport Strategy (Bitzios, 2015) and assumed a similar pattern for the Saturday peak hour.

Table 3 – Arrival patterns

Directions (From)	Percentage AM	Percentage PM	Percentage SAT
Cumberland Highway North	30	20	28
Dunmore St West	34	15	18
Cumberland Hwy South	5	4	5
Dunmore St East	23	53	41
Station Street	8	8	8

Table 4 – Departure patterns

Directions (From)	Percentage AM	Percentage PM	Percentage SAT
Cumberland Highway North	13	19	20
Dunmore St West	15	28	19
Cumberland Hwy South	1	3	3
Dunmore St East	40	19	26
Station Street	31	30	32

Using the development yield under the preferred development concept, the resultant traffic generation of the proposal is presented in **Table 5**.

Table 5 – Traffic generation

Development Generated Traffic	Peak Hour Traffic (vehicles per hour)		
	AM Peak Hour	PM Peak Hour	Saturday Peak Hour
Proposed			
Residential	133	105	175
Retail	160	197	228
Medical centre	41	41	41
Commercial	28	28	-
Total	+ 363	+ 371	+ 444
Current Retail Traffic	- 169	- 207	- 243
Resultant Increase	+ 194	+ 164	+ 201

The resultant increase in traffic due to the proposal would be in the order of 160 to 200 vehicles per hour during the weekday AM, PM or Saturday peak periods. These figures have been adopted for the post development traffic modelling purposes.

Using the arrival and departure patterns discussed above and the resultant increase in traffic generated by the proposal, the development generated traffic is assigned to the key external road network. Refer to **Appendix H** for post development intersection flow diagrams (including the background traffic growth) for the AM, PM and Saturday peak hours.

The analysis results for future post development conditions are presented in **Table 6**.

Table 6 – Post development conditions

Intersection	Control Type	Thursday AM		Thursday PM		Saturday	
		Ave Delay (sec)	LoS	Ave Delay (sec)	Ave Delay (sec)	LoS	Ave Delay (sec)
Cumberland Hwy/Dunmore St	Signals	44	D	52	D	38	C
Dunmore St/Station St	Signals	29	C	44	D	47	D
Dunmore St/Garfield St	Give-way	29	C	36	C	36	C
Garfield St/Pritchard St	Stop	9	A	9	A	10	A
Pritchard St/Station St	Give-way	30	C	34	C	37	C

The intersection assessment results shown above indicate that all intersections (except for Cumberland Highway/Dunmore Street and Dunmore Street/Station Street intersections) would operate satisfactorily with LoS C or better for all three peak periods.

Cumberland Highway/Dunmore Street intersection would continue to operate near capacity (i.e. LoS D) in the future with or without the development traffic added to the road network. Dunmore Street/Station Street intersection would operate near capacity (i.e. LoS D) with the development traffic added to the road network. It is expected that the majority of intersections along the arterial road would operate at or near capacity during the commuter peak periods. Hence, intersections operating at Level of Service D (i.e. near capacity) during peak periods are generally considered acceptable.

A new pedestrian crossing point is proposed at Dunmore Street, which would complement the proposed through link across the site. This is consistent with a draft Wentworthville Centre Planning and Place Making Strategy, which was recently released for public comment (refer **Figure 9**).

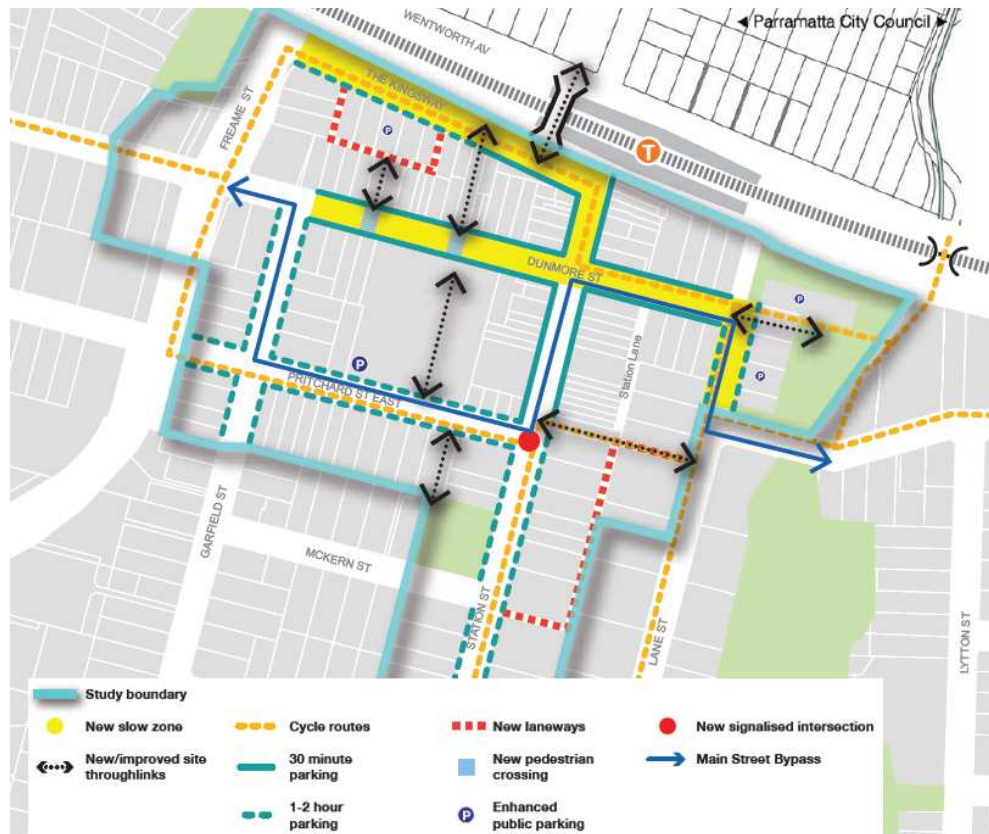


Figure 9 – [Traffic and transport strategy]

The draft Wentworthville Centre Planning and Place Making Strategy indicates that:

- vehicles take priority in the Centre, with limited pedestrian crossing opportunities and large distances between each crossing
- the community has indicated concern regarding lack of the pedestrian crossings and particularly the ability to cross Dunmore Street safely
- new pedestrian crossings will be created on Dunmore Street to facilitate greater pedestrian access in the Centre.

It is noted that whilst the draft Wentworthville Centre Planning and Place Making Strategy identified that new pedestrian crossings will be created on Dunmore Street, it does not specify the type of pedestrian crossings. There are a number of options in providing mid-block pedestrian crossings:

- kerb extension or blister – whilst this is not a formal pedestrian crossing, a kerb extension could be used as a traffic calming measure, primarily used to extend the sidewalk, reducing the crossing distance and allowing pedestrians to cross and approaching vehicle drivers to see each other when vehicles parked in a parking lane would otherwise block visibility. However for busy roads, it may not provide sufficient opportunities for pedestrians to cross the road.
- pedestrian crossings (zebra crossings) - where high level of pedestrian activity is expected, provision of zebra crossings can be provided (assuming that they achieve the appropriate warrants) but with a steady stream of pedestrians can cause long vehicle delays and queuing.
- signalised pedestrian crossings – a signalised crossing allows pedestrians and road traffic to use the crossing alternately. An example of an existing pedestrian crossing at Victoria Avenue, Chatswood is shown in **Figure 10**. This signalised crossing is located on a busy road with a high level of pedestrian activity where high frequency of pedestrian phase is provided.

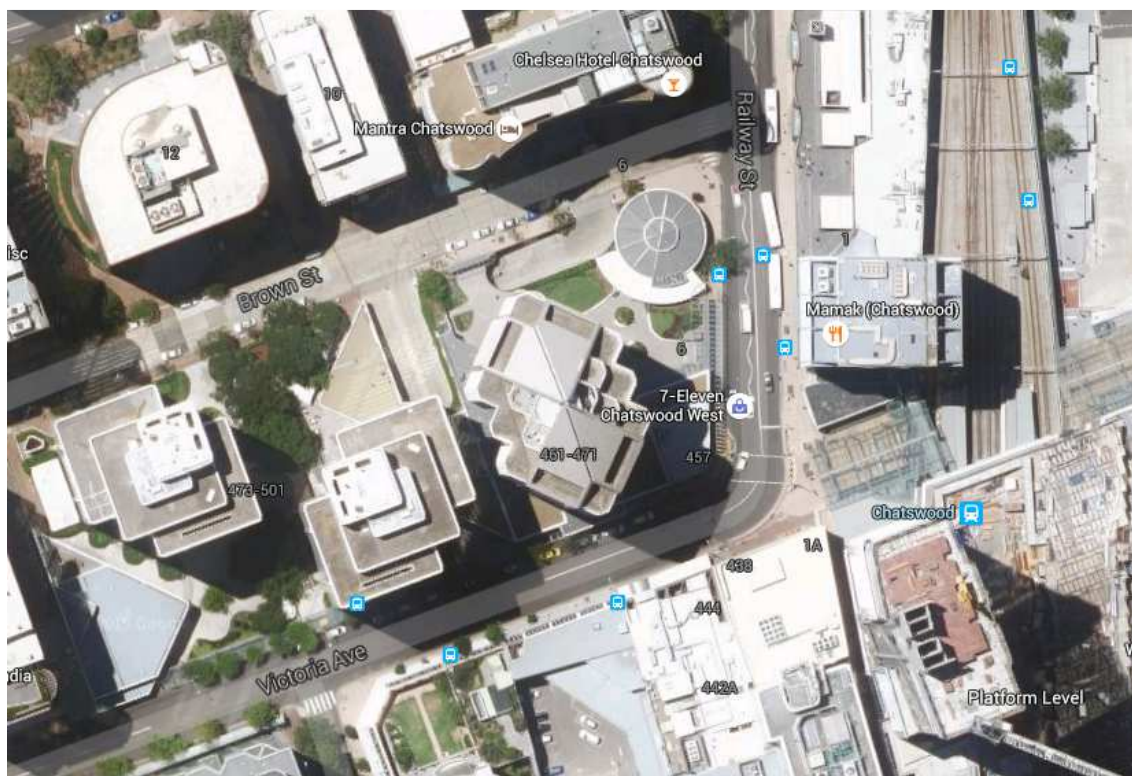


Figure 10 – Chatswood pedestrian crossing

It is also noted in the draft Wentworthville Centre Planning and Place Making Strategy, a bypass traffic management solution is to be implemented in the Centre, limiting through traffic on Dunmore Street, encouraging vehicles to use Pritchard Street East and Garfield Street. Hence, the proposed bypass will significantly reduce the through traffic on Dunmore Street and implementation of the bypass measures will be a key factor in determining the type of pedestrian crossing most appropriate for Dunmore Street.

Considering these factors, the traffic and transport impacts of the proposal can be adequately mitigated.

Issue 10: On site carparking

Due to some layout and design revisions, carparking numbers for non-residential uses have increased from 347 spaces to 443 spaces. The number of residential spaces has not changed. The new numbers are as follows:

- Residential: 533
- Non-residential: 443
- Total: 976.

This is an increase of 96 spaces from the original Planning Proposal.

Under SEPP65 and the ADG, the supporting design criteria for on-site carparking is as follows:

"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".

Under the RTA Guide, the Planning Proposal will facilitate a high density residential flat building, being a building containing 20 or more dwellings, usually more than five levels, basement level car parking and are located in close proximity to public transport services. The building may contain a component of commercial use.

On-site carparking rates for high density residential flat buildings in Metropolitan Sub-Regional Centres (which is equivalent to Wentworthville) are as follows:

- 0.6 spaces per 1 bedroom unit.
- 0.9 spaces per 2 bedroom unit.
- 1.40 spaces per 3 bedroom unit.
- 1 space per 5 units (visitor parking).

An assessment of the preferred development concept against the RTA guide is shown in **Table 7**.

Table 7 – Carparking analysis

Type	Number	Rate	Required	Provided	Compliance
Studio*	130	0.6/unit	78	0	-78
Studio and 1 bed	202	0.6/unit	122	101	-21
2 bed	300	0.9/unit	270	300	+30
3 bed	66	1.4/unit	93	132	+39
			563	533	-30

*Note that the RTA Guide does not recognise studio dwellings

As is shown, the preferred development scheme has a shortfall of 30 spaces compared to the requirements of the RTA Guide. It is noted that this represents just over 5% of the required number of spaces, which is a relatively minor variation, and that the shortfall is derived purely from studio and 1 bedroom dwellings (with the majority coming from studios).

Where a proposal cannot or does not satisfy the design criteria, assessment of the appropriateness of this non-compliance is to be made against the objective. The relevant ADG objective (3J-1), which is used to address SEPP65, is as follows:

“Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas”

Being located on the Western and Cumberland Lines, Wentworthville has excellent public transport accessibility. Rail services provide frequent, high capacity connections to key centres and other concentration of jobs and economic activity, including Westmead (1 stop), Parramatta (2 stops) and the Sydney CBD.

On this basis, the proposed amount of carparking is justified.

Issue 11: Location of residential visitor carparking spaces

Consistent with council’s stated position, this is not a critical issue for resolution at the Planning Proposal stage. Council’s comments in relation to separation of residential visitor and commercial / retail parking spaces being reviewed as part of council’s planning strategy is noted.

Issue 12: Confirmation of height

It is confirmed that the maximum height in storeys proposed under the preferred development concept is:

- two 25 storey buildings on the northern, Dunmore Street part of the site

- two 15 storey buildings on the southern, Pritchard Street part of the site.

Identifying the two buildings on the southern, Pritchard Street parts of the site as 13 storey buildings in the original Planning Proposal was an error that did not take into account the 2 storey podium.

This equates to a maximum mapped height in meters of 90m at the Dunmore Street part of the site and 55m at the Pritchard Street part of the site.

Building typologies

The draft strategy largely proposes a perimeter block, or street wall, built form typology. However, in certain strategic locations such as the site, it also enables tower forms. In this sense, it can be regarded as a hybrid between classic perimeter block and podium and tower typologies. This hybrid approach provides a number of benefits, including:

- **public open space** – freeing up approximately 30% of the site's valuable ground floor space for tangible community benefit such as public open space
- **improved residential amenity** – taller buildings allow apartments to achieve better views, solar access and daylight, particularly as taller buildings require greater building separation. Taller buildings can also raise the majority of apartments above noise sources (road and rail)
- **smaller urban footprint** – the taller building heights provide greater floor space potential on sites and therefore limit the land area required for significant redevelopment in the town centre cores. If building heights were reduced, additional land would be required to accommodate a similar amount of floor space
- **public domain quality** – towers enable a greater sense of openness at street level with better opportunities for more daylight and sunlight between buildings at street level
- **visual interest** – towers break up the visual monotony of continuous perimeter blocks forms, articulating and modulating the skyline and providing visual interest.

Most people's perception of their surrounding environment is influenced by what occurs at the ground and lower levels of buildings. With this in mind, it is important to ensure that in town centre locations, the ground and lower floors feature a high level of design and construction quality and engage with the public domain, including through active uses such as cafes and restaurants at the ground floor and large transparent windows or balconies off main living areas at lower floors. Good design as demonstrated by the development concept, which involves sensitive consideration of building placement, orientation and design such as the setting of towers back from the outer edge of the street wall and orienting their long edge perpendicular to the east-west path of the sun, means that towers can both provide for a critical mass of new homes and jobs while also having minimal adverse visual and physical impact on the public domain. Indeed, so important is the quality of the ground a lower floors, provided that they are placed (eg a small number), oriented (eg perpendicular to the street) and designed (eg narrow widths) well, once above a certain height, most people will have minimal ability to readily perceive a height difference between 18 storeys as proposed under the draft strategy and 25 storeys proposed under the Planning Proposal.

Site specific opportunities and constraints

It is acknowledged that the draft strategy provide a broad, precinct wide development framework for the town centre. However, for the Mall site, it's setting of a predominantly perimeter block typology does not align with the sites specific opportunities and constraints.

Due to the large size and depth of the site, placing perimeter block buildings at the Dunmore and Pritchard Street frontages compromises the useability of the balance of the site. Under this configuration, a large internalised courtyard space is created. While advantageous for residents of the development, this internalise space does not make a valuable contribution to the street, and does not invite public access. This outcome also compromises the viability of the site, as the costs associated with providing basement excavation for an underground carpark associated with a full line supermarket and other commercial and retail space (about 2.3 levels over the full site) will unlikely be sufficiently

offset by the low dwelling yield. An additional, third parallel perimeter block typology building can be placed in the internal space, however factoring in the land dedication required for Dunmore Plaza, this will compromise the achievement of separation distance, solar access and on-site open space outcomes under the ADG.

Furthermore, the perimeter block typology and the need to include a full line supermarket also compromises the utility of the site to accommodate a functional, high quality, open to the sky through block link. The inclusion of tower forms oriented perpendicular to the street provides both a yield that incentivises redevelopment and free up a sufficient amount of the ground place to deliver a useable, high quality sequence of public plazas and a through block link. This is not enabled with an alternative perimeter block configuration.

In any event, when the reduced yield is factored in, the resultant development compared unfavourably both in terms of incentivising redevelopment and providing tangible community benefit, both for a cost and practicality perspective.

Conclusion

The Planning Proposal responds to Sydney's changing planning context, optimising the strategic role of rail based centres in accommodating Sydney's sustained and substantial population growth and repositioning Wentworthville to promote and support the continued evolution of Parramatta as Sydney's second CBD and capital of the west. In addition, its layout, form, FSR and height facilitates the delivery of many of the key priorities for revitalisation identified in council draft strategy, incentivising early delivery to catalyse further renewal in the centre.

The Planning Proposal is well timed with the current market, representing a time limited opportunity to catalyse significant renewal of the town centre. As concluded by Think Planners, it is also consistent with community expectations for future development of the town centre.

On this basis it is requested that council favourably consider the Planning Proposal, as amended through this response, and resolve to forward it to the Department of Planning and Environment for Gateway Determination.

Should you have any queries about this issue, please do not hesitate to contact me on 9956 6962 or CBain@jbaurban.com.au.

Yours sincerely



Chris Bain
Principal Strategic Planner