

- Strengthen Sydney's role as a globally competitive city
- Strengthen Parramatta's role as the premier Regional City and second CBD
- Support key economic gateways with integrated land use, infrastructure and transport planning
- Plan to grow global businesses, investment, innovation and research & development
- Strengthen links to Regional Cities, Australian capital cities and South East Asia

Growing and renewing centres

- Locate at least 80 per cent of all new homes within the walking catchments of existing and planned centres of all sizes with good public transport
- Focus activity in accessible centres and limit out-of-centre commercial development
- Plan for centres to grow and change over time
- Plan for new centres in existing urban areas and greenfield release areas
- Plan for urban renewal in identified centres
- Support clustering of businesses and knowledge-based activities in Major and Specialised Centres

Transport for a connected city

- Implement the Metropolitan Transport Plan's \$50.2 billion in projects and enhancements
- Target development around existing and planned transport capacity
- Improve passenger rail capacity for Sydney's South West and North West and the Sydney-Parramatta-Penrith corridor
- Enhance freight rail paths and intermodal terminals
- Enhance capacity on Sydney's motorways at key locations
- Identify long-term transport corridors for passengers and freight
- Improve local opportunities for walking, cycling and using public transport

Housing Sydney's population

- Plan for 770,000 additional homes with a range of housing types, sizes and affordability levels for a growing and ageing population
- Locate at least 70 per cent of new homes in existing suburbs and up to 30 per cent in greenfield areas
- Drive delivery through subregional targets and Local Environment Plans with follow-through on outcomes and yield

Growing Sydney's economy

- Plan for 760,000 new jobs, with half in Western Sydney and most in cities or centres
- Extend Sydney's Global Economic Corridor to Parramatta from Macquarie Park
- Develop detailed land use, transport and infrastructure plans for Western Sydney employment areas
- Support high growth and high value industries through clustering
- Increase the proportion of homes within 30 minutes by public transport of jobs in a major centre, ensuring more jobs are located closer to home

Balancing land uses on the city fringe

- Contain Sydney's urban footprint by focusing greenfield development in the North West and South West Growth Centres
- Maintain and protect Sydney's rural and resource lands

Tackling climate change and protecting the natural environment

- Reduce greenhouse gas emissions from the manufacturing and commercial sectors
- Expand BASIX to include further measures for the residential sector

- Prepare a climate change adaptation strategy for Sydney
- Integrate environmental targets into land use and infrastructure decisions
- Implement water, air and biodiversity plans for Sydney

Achieving equity, liveability and social inclusion

- Consider social impacts in planning and assessment
- Protect places of special cultural, open space and heritage value
- Strengthen the State's lead on best practice urban renewal for improved liveability
- Set affordable housing targets for State urban renewal projects

Delivering the Plan

- Establish new mechanisms to achieve urban renewal (Sydney Metropolitan Development Authority and the Urban Renewal State Environmental Planning Policy)
- Continue to identify transport capacity and opportunities for residential and employment growth
- Strengthen strategic infrastructure planning processes
- Prioritise nationally significant infrastructure
- Drive implementation through subregional strategies
- Simplify the land release process to ensure sufficient land is available for development
- Prepare an annual Metropolitan Plan Update Report with councils

Comment:

An important aspect of this strategy relates to the supply of a greater proportion of new housing in areas of good public transport nodes. Opportunities for increased housing in transport corridors, centres and close to job concentrations should be pursued.

The development of more dwellings in these established areas would further serve to improve housing choice. This type of development around employment centres and key transport facilities will improve the choices in housing and lifestyle. The proposed development satisfies this strategy by providing a controlled and orderly development in close proximity to public transport nodes and services. The Strategy has been replaced by the Draft Metropolitan Strategy for Sydney 2031 addressed below in Section 5.3.7.

5.3.5 METROPOLITAN TRANSPORT PLAN (2010)

The Metropolitan Transport Plan, Connecting the City of Cities, sets out a 25 year vision for Sydney's transport planning and is supported by a 10 year funded package of transport infrastructure. The Plan is intended to be read in conjunction with the Metropolitan Plan.

Key to this assessment is the vision that,

"Much of Sydney's growth challenge will be met by making the most of the city's existing urban areas. New housing, workplaces, public spaces and improved transport will be integrated to achieve genuine renewal."

Under the Plan, the State Government will set up a Sydney Metropolitan Development Authority to coordinate future transit-oriented development and urban renewal. The Metropolitan Transport Plan uses the NSW Department of Planning's (DoP) latest employment and dwelling targets for the Sydney Metropolitan Region over the period from 2006-2036. To accommodate the forecast population growth, Sydney is likely to require the development of 699,800 dwellings and generate an additional 713,920 jobs by 2036.

The Strategy has been replaced by the Draft Metropolitan Strategy for Sydney 2031.

5.3.6 NSW STATE PLAN

The NSW State Plan (Priority Item E6) articulates the State's response to housing affordability: it acknowledges that one of the factors affecting affordability is housing and recognition that there is a need to ensure there is competitive tension in the supply of land so that there is a continuing flow of new properties into the market.

The NSW State Plan provides a commitment to streamline the planning approval process to make it easier to deliver affordable housing by increasing the availability of zoned lots so that there is enough land for future supply when needed. It also commits to promoting expanded supply of land for housing in existing urban areas via local targets for each LGA; and to deliver housing growth around regional centres to ensure access to infrastructure services.

There is a significant shortage of housing production across NSW. Housing production in NSW has dramatically fallen since 2003 and Greenfield land supply has been at record lows for five years.

It now accounts for only 10% of all new dwellings even given the Government's own policy requirement of 30- 35% of all new dwellings (UDIA State of the Land Report 2009).

5.3.7 DRAFT METROPOLITAN STRATEGY FOR SYDNEY 2031

This Metropolitan Strategy sets the framework for Sydney's growth and prosperity to 2031 and beyond. It lays a strong and ambitious strategic planning foundation for all 41 councils in the metropolitan region that will put Sydney on course to cement its position as Australia's pre-eminent city. To achieve this, the focus of the Strategy is on boosting housing and jobs growth across all of Sydney.

The Strategy supports the key goals, targets and actions contained in NSW 2021, the NSW Government's business plan to make NSW number one. It has been prepared in conjunction with the NSW Long Term Transport Master Plan and the State Infrastructure Strategy to fully integrate land use and infrastructure outcomes.

The Strategy will be delivered within a new planning system that will make NSW the first choice for business investment. This will drive the sustainable growth of Sydney, and ensure planning and environmental outcomes reflect community and business expectations.

The Metropolitan Strategy has been informed by what the community has told us is important to them. For the first time, the community also has the opportunity to comment on a draft of this important Strategy before it is adopted. This is consistent with the government policy of early community engagement in the planning process.

To drive the sustainable growth of Sydney to 2031 and beyond, the Metropolitan Strategy is built around achieving five key outcomes for Sydney:

- balanced growth
- a liveable city
- productivity and prosperity
- healthy and resilient environment

- accessibility and connectivity.

Strathfield is located within the Central Subregion. The PP is consistent with the Plan for increasing population and, housing and employment growth.

5.3.8 IS THE PLANNING PROPOSAL CONSISTENT WITH LOCAL COUNCIL'S COMMUNITY STRATEGIC PLAN, OR OTHER LOCAL STRATEGIC PLAN?

The local strategic planning context was summarised at 5.2.1.2 above and clearly identifies the growth that will occur in Strathfield in the ensuing years.

The subject planning framework has importantly identified opportunities for the development in Strathfield, leveraging off the existing infrastructure and the prevailing sense of community, but does not identify the subject land given the location within the golf course property.

5.3.9 IS THE PLANNING PROPOSAL CONSISTENT WITH APPLICABLE STATE ENVIRONMENTAL PLANNING POLICIES?

The following State Environmental Planning Policy (SEPP) applies to the planning proposal:

- State Environmental Planning Policy 65 – Design Quality of Residential Flat Buildings;
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004;
- State Environmental Planning Policy (Infrastructure) 2007; and
- State Environmental Planning Policy 55 – Remediation of Land.

5.3.9.1 STATE ENVIRONMENTAL PLANNING POLICY 65 – DESIGN QUALITY OF RESIDENTIAL FLAT BUILDINGS

The Environmental Planning and Assessment Amendment (SEPP 65) Regulation 2002 and State Environmental Planning Policy No 65 –Design Quality of Residential Flat Development were gazetted on 26 July 2002. The Regulation and SEPP were introduced to improve the design quality of residential flat developments within NSW.

5.3.9.1.1 OBJECTIVES

The policy applies to residential flat building developments of three or more storeys comprising four or more self-contained dwellings. The Policy is a matter for consideration in assessment of development applications for residential flat buildings, which fit those criteria under Section 79C(1)(a)(i) of the Environmental Planning and Assessment Act 1979, as amended.

5.3.9.1.2 DESIGN QUALITY PRINCIPLES

The Policy identifies ten principles, which provide a basis for evaluation of the merit of proposed designs of residential flat buildings and for preparation of subsequent planning policies and design guidelines, as listed below:

- Principle 1 – Context
- Principle 2 – Scale
- Principle 3 – Built Form
- Principle 4 – Density

- Principle 5 – Resource, Energy and Water Efficiency
- Principle 6 – Landscape
- Principle 7 – Amenity
- Principle 8 – Safety and Security
- Principle 9 – Social Dimensions
- Principle 10 – Aesthetics

These Principles and compliance with the SEPP will be addressed in the development application. Importantly however; the development has been designed (building envelopes, setbacks, etc) to be compliant with this SEPP, as detailed on the concept plans that accompany this proposal.

5.3.9.2 STATE ENVIRONMENTAL PLANNING POLICY (BUILDING SUSTAINABILITY INDEX: BASIX) 2004

BASIX is the Building Sustainability Index, the State Government's web-based planning tool designed to assess the potential performance homes against a range of sustainability indices, being: Landscape, Stormwater, Water, Thermal Comfort and Energy.

The BASIX SEPP was gazetted on 25 June 2004, and operates in conjunction with the Environmental Planning and Assessment Amendment (Building Sustainability Index: BASIX) Regulation 2004 to ensure consistency in the implementation of BASIX in NSW.

The SEPP ensures consistency in the implementation of BASIX throughout the State by overriding competing provisions in other environmental planning instruments and development control plans.

5.3.9.3 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

SEPP (Infrastructure) 2007 rationalises consultation required in relation to traffic generating developments. The proposal may be one that requires referral to the RMS for consideration given the development falls within the criteria. It would be noted that preliminary discussions have been held with RMS regarding this proposal, given that Centenary Drive is an RMS controlled road. The RMS will be further involved during the public consultation phase.

5.3.3.4 STATE ENVIRONMENTAL PLANNING POLICY NO 55 – REMEDIATION OF LAND

Due to the nature of former land uses on the site, the proposed development is subject to the provisions of SEPP 55 – Remediation of Land. Specifically the Policy provides under Clause 7(1) that development consent must not be granted by Council unless:

- (a) It has considered whether the land is contaminated, and
- (b) If the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and
- (c) If the land requires remediation to be suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.

In accordance with SEPP 55 a Stage 1 Contamination Assessment may be required as part of the Gateway requirements given that the practice fairway may have been the subject of chemical sprays used for weed control.

The land is also subject to the provisions of a raft of State Environmental Planning Policies. The subject policies are noted below in Table 3 and importantly do not prohibit and/or significantly constrain the Planning Proposal.

TABLE 3 – APPLICABLE STATE POLICIES

SEPP	Comment
State Environmental Planning Policy No 1 – Development Standards	Not applicable. (As referenced in Strathfield LEP, 2012. Clause 4.6 of LEP makes provision for variations to development standards).
State Environmental Planning Policy No 4 – Development without Consent and Miscellaneous Exempt and Complying Development	Not inconsistent (As referenced in Strathfield LEP, 2012. Clause 6 and Parts 3 and 4 do not apply).
State Environmental Planning Policy No 6 – Number of Storeys in a Building	Not inconsistent (Maximum building height will be subject to maximum height expressed in metres).
State Environmental Planning Policy No 15 – Rural Landsharing Communities	Not applicable (Strathfield is not included in the land applicable schedule).
State Environmental Planning Policy No 19 – Bushland in Urban Areas	Not applicable (Strathfield is not included in the land applicable schedule).
State Environmental Planning Policy No 21 – Caravan Parks	Not applicable (Caravan Parks are prohibited under the proposed R3 and B4 zones as currently prevailing in Strathfield LEP, 2012).
State Environmental Planning Policy No 22 – Shops and Commercial Premises	Not applicable.
State Environmental Planning Policy No 26 – Littoral Rainforests	Not applicable.
State Environmental Planning Policy No 29 – Western Sydney Recreational Area	Not applicable.
State Environmental Planning Policy No 30 – Intensive Agriculture	Not applicable.
State Environmental Planning Policy No 32 – Urban Consolidation (Redevelopment of Urban Land)	Not applicable.
State Environmental Planning Policy No 33 – Hazardous and Offensive Development	Not applicable.
State Environmental Planning Policy No 36 – Manufactured Home Estates	Not applicable (Strathfield is in the Sydney Region which is excluded from the Policy's application).
State Environmental Planning Policy No 44 – Koala Habitat Protection	Not applicable.
State Environmental Planning Policy No 50 – Canal Estate Development	Not applicable.
State Environmental Planning Policy No 52 – Farm Dams and Other Works in Land and Water Management Plan areas	Not applicable.
State Environmental Planning Policy No 53 – Metropolitan Residential Development	Not applicable.

SEPP	Comment
State Environmental Planning Policy No 55 - Remediation of Land	Applicable. A Phase 1 contamination report will be required and potentially a Phase 2, depending on outcomes of Phase 1.
State Environmental Planning Policy No 59 - Central Western Sydney Regional Open Space	Not applicable (Land not located in Central Western Sydney).
State Environmental Planning Policy No 60 - Exempt and Complying Development	Limited application.
State Environmental Planning Policy No 62 - Sustainable Aquaculture	Not applicable.
State Environmental Planning Policy No 64 - Advertising and Signage	Not inconsistent.
State Environmental Planning Policy No 65 - Design Quality of Residential Flat Development	Not inconsistent.
State Environmental Planning Policy No 70 - Affordable Housing (revised schemes)	Not inconsistent.
State Environmental Planning Policy No 71 - Coastal Protection	Not applicable.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	Not inconsistent (The relevant principles will inform building design).
State Environmental Planning Policy (Exempt and Complying Codes) 2008	Not inconsistent.
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	Not inconsistent.
State Environmental Planning Policy (Infrastructure) 2007	Not inconsistent.
State Environmental Planning Policy (Major Development) 2005	Not inconsistent.
State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007	Not inconsistent.
State Environmental Planning Policy (Rural Lands) 2008	Not applicable.
State Environmental Planning Policy (Sydney Region Growth Centres) 2006	Not applicable.
State Environmental Planning Policy (Temporary Structures) 2007	Not applicable.
State Environmental Planning Policy (Western Sydney Employment Area) 2009	Not applicable.
State Environmental Planning Policy (Western Sydney Parklands) 2009	Not applicable.
Deemed State Environmental Planning Policy No 20 (SREP 20)	Not inconsistent.

SEPP	Comment
Deemed State Environmental Planning Policy No. 9 (No.2) (Extractive Industries)	Not applicable.

5.3.10 IS THE PLANNING CONSISTENT WITH APPLICABLE MINISTERIAL DIRECTIONS (S 117 DIRECTIONS)?

Attached as **Annexure F** is a compliance table addressing these Directions.

5.4 SECTION C - ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

5.4.1 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?

The site does not present elements of an endangered ecological community (vegetation). The practice fairway is devoid of vegetation. However, it is lined both sides by existing trees (refer to photographs above) and these trees will be retained.

5.4.2 ARE THERE ANY OTHER LIKELY ENVIRONMENTAL EFFECTS AS A RESULT OF THE PLANNING PROPOSAL AND HOW ARE THEY PROPOSED TO BE MANAGED?

5.4.2.1 BUSHFIRE HAZARD

The subject site is not known to be bushfire prone.

5.4.2.2 ACID SULPHATE SOIL

The subject site is not known to be subject to acid sulphate soils. However, the buildings and infrastructure can be designed to such a standard.

5.4.2.3 NOISE IMPACT

The proposed buildings may be subject to noise impacts from Centenary Drive and Liverpool Road. At the development stage, the buildings will need to be designed to appropriate Australian Standard based on the requirements of the *NSW Road Noise Policy*.

5.4.2.4 SOIL STABILITY AND SUBSIDENCE

The practice fairway does not present elements of any soil instability and is not located in a Mines Subsidence District.

5.4.2.5 WATER QUALITY

The principles of Water Sensitive Urban Design (WSUD) will be incorporated in the development application stage to ensure the quality of receiving waters is improved with a reduction in pollutant loads being the target of the design. Modelling would be undertaken using the MUSIC Model or similar model that assesses water quality.

5.4.2.6 STORMWATER MANAGEMENT

At the development application stage, a detailed stormwater management system will be prepared having regard to the catchment area and the capacity of downstream stormwater infrastructure. The proposal may require on site detention (OSD) to ensure that the maximum discharge from the post-development site not exceeding the pre-development flows for all storm up to and including the 1% AEP (1 in 100 year flood event). This will involve modelling of the area and to ensure downstream properties are not impacted by the development.

5.4.2.7 FLOODING

The Cooks River traverses the land to the north of the practice fairway. This river system may be subject to flooding. However, given the distance the practice fairway is from the river and the rise in the land, it is unlikely that the fairway is subject to flooding.

All the preceding potential impacts are importantly manageable and will inform the final design and development and implementation of management guidelines.

5.4.3 HOW HAS THE PLANNING ADEQUATELY ADDRESSED ANY SOCIAL AND ECONOMIC EFFECTS?

The PP has addressed the current land supply limitations and move toward fulfilling the accommodation needs attached to the subregional population and housing projections. The proposal has positive social and economic contributions as discussed above in the various Strategies by providing much needed housing choice in the LGA and indeed housing choice, particularly within a parkland setting.

Indeed, under the proposed scenario, no adverse social and/or economic impacts are foreshadowed, but rather positive impacts will accrue in this regard.

5.4.4 SOCIAL AND CULTURAL CONSIDERATIONS

5.4.4.1 HERITAGE IMPACT

The subject site does not adjoin land that has been identified as a heritage item or within a conservation area.

5.4.4.2 ABORIGINAL ARCHAEOLOGY

The subject site has been used for a practice fairway since golf was first played in 1898. It is unlikely that there would be any artefacts located on this part of the land.

5.4.4.3 OPEN SPACE MANAGEMENT

The open space lands will remain under the management of the Club.

5.5 SECTION D – STATE AND COMMONWEALTH INTERESTS

5.5.1 IS THERE ADEQUATE PUBLIC INFRASTRUCTURE FOR THE PLANNING PROPOSAL?

Public infrastructure will be required to be augmented to support the development of the subject land as communicated in this PP.

The nature and extent of augmentation will be finally determined having regard to more detailed investigations as part of the continued "evolution" of this PP. As a minimum, the existing reticulated water system in the area will need to be extended. Detailed liaison will need to occur with the service provider in this regard, namely Sydney Water. The logistics (physical and economic) of providing such requisite infrastructure are considered to be realisable to service the proposed development.

The nature of the land is such that a comprehensive stormwater management plan predicated upon the principles of Water Sensitive Urban Design can be readily designed and implemented as part of the envisaged development scheme.

Reticulated electricity and telecommunications facilities will also be provided as service infrastructure.

Amplification/enhancement of offsite infrastructure, including community infrastructure, will involve relevant contributions pursuant to Section 94 (EP&A Act) and/or a Voluntary Planning Agreement. Such contributions will be determined in response to more detailed planning actions as the PP progresses.

5.5.2 WHAT ARE THE VIEWS OF STATE AND COMMONWEALTH PUBLIC AUTHORITIES CONSULTED IN ACCORDANCE WITH THE GATEWAY DETERMINATION?

The Gateway determination will identify any consultation required with State or Commonwealth Public Authorities. This will include:

- Consultation required in accordance with a Ministerial Direction under section 117 of the EP&A Act; and
- Consultation that is required because in the opinion of the Minister (or delegate), a State or Commonwealth public authority will or may be adversely affected by the proposed LEP.

Consultation is required with the following public authorities under section 56(2)(d) of the EP&A Act 1979, as amended:

- Federal Department of Sustainability, Environment, Water, Population and Communities;
- Integral Energy;
- NSW Office of Environment and Heritage (Environment Branch);
- Transport for NSW – Roads and Maritime Services;
- Sydney Water;
- Telstra;
- Adjoining LGAs.

6 Part 4 – Community Consultation

Community consultation remains an important element of the Plan making process. The companion document "A Guide to Preparing Local Environmental Plans" outlines community consultation parameters.

The subject provisions in respect of notification and the exhibition materials to support the consultation will be observed.

Before proceeding to public exhibition, the Director General of Planning (or delegate) must approve the form of the Planning Proposal as being consistent with the "Gateway" determination (EP&A Act 57(2)).

It is envisaged that further community consultation would occur through the public exhibition of detailed documents lodged with the development application for the development proposal.

This further consultation will, at a minimum include, advertising in local papers, exhibition material provided at Strathfield Council administration buildings and libraries and Strathfield Council's webpage and the required written notifications that would ordinarily be required.

Once Council is satisfied with the amended Planning Proposal following determination at the Gateway, it is recommended that it will be publicly exhibited for a period of 28 days.

7 Conclusion

The preceding commentary has clearly established a case for the limited review the planning provisions as they pertain to the subject land.

Council is accordingly requested to take the necessary steps to commence the process of rezoning the subject lands as detailed in this submission at section 4.

Limited additional environmental and infrastructure investigations will need to be undertaken and broad commitments to infrastructure provision made as the PP is advanced.

Council, as the responsible Planning Authority, is requested to support and forward this PP to the Department of Planning and Infrastructure for progressing through the "Gateway" in an expedient manner.

SINCERELY YOURS,



M J BROWN
DIRECTOR
MICHAEL BROWN PLANNING STRATEGIES PTY LTD

