



Our Reference: RZ/21/2017
Contact: Amberley Moore
Telephone: 9806 5115

Adam Byrnes
Director
Think Planners
PO Box 121
WAHROONGA NSW 2076

Via email: adam@thinkplanners.com.au

3 May 2018

Dear Adam

ASSESSMENT OF PLANNING PROPOSAL FOR 56-72 DUDLEY STREET AND 55-71 CROWGEY STREET, DUNDAS

Council officers have completed a preliminary assessment of the Planning Proposal submitted to City of Parramatta Council by Aleksandar Design Group on behalf of AMD Dudley Street Properties P/L (the proponent) for land at 56-72 Dudley Street and 55-71 Crowgey Street, Dundas (RZ/21/2017).

The proposed densities included in the planning proposal of up to 80m (25 storeys) and floor space ratios of 4:1 and 5:1 are considered to be inappropriate for the site given the role of the Dundas centre within the City of Parramatta's centres hierarchy. The assessment has identified a number of issues from strategic planning, urban design, traffic and transport, open space and social perspectives and are detailed below.

Strategic Merit

1. Within the current strategic planning framework, it is not envisaged that Dundas will be a major centre along the light rail route. Development at the scale proposed in the planning proposal will set an undesirable precedent for future development in this precinct given this context. Nevertheless, it is anticipated that Council will be undertaking a review of the strategic planning framework within Dundas that will take into account the introduction of the light rail and the role of the Dundas Centre. This review will determine the appropriate density of future development in this area including the Dudley and Crowgey Streets site and will provide the basis for any revised planning controls across the entire precinct. Until such time that Council has undertaken the necessary strategic work to determine the appropriate densities for this precinct, redevelopment should be generally consistent with the existing scale and character.

Density, Urban Design

2. As noted, despite its location on the future light rail line, the role of the Dundas Centre is intended to be that of a supporting centre to the major

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ENGLISH

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FILIPINO

Kung kailangan mo ng tulong sa pag-iinterpretar nitong sulat, pakitawagan ang Serbisyo ng Pag-iinterpretar sa Telepono (131 450)(Telephone Interpreter Service)at hilingin sa kanilang tawagan ang Konseho (9806 5050). Oras ng Opisina ay 8.30n.u hanggang 5.00n.h, Lunes hanggang Biyernes.

CHINESE

如果您需要传译员协助才能看懂本信件，请联系电话传译员服务（131 450），然后要求他们联系市议会（9806 5050）。办公时间是星期一至星期五上午8时30分至下午5时。

ARABIC

إذا كنت بحاجة إلى مساعدة لتفسير محتوى هذه الرسالة، يرجى الاتصال بخدمة الترجمة الهاتفية (131 450) واطلب منهم الاتصال بالمجلس (9806 5050). ساعات العمل هي 8:30 صباحاً حتى 5:00 مساءً ، من يوم الاثنين إلى يوم الجمعة.

HINDI

यदि आपको इस पत्र के लिए दुभाषिण की सहायता की आवश्यकता है, तो कृपया टेलीफोन दुभाषिया सेवा (131 450) से संपर्क करें और उनसे काउंसिल (9806 5050) से संपर्क कराने के लिए कहें. कार्य के घंटे हैं: सुबह 8:30 से शाम 5:00 बजे तक, सोमवार से शुक्रवार.

KOREAN

본 문서에 관해 통역의 도움이 필요하시면, 전화통역 서비스(131 450)로 연락해서 카운슬 전화(9806 5050) 연결을 요청하시기 바랍니다. 근무 시간은 월~금요일 오전 8시 30분부터 오후 5시까지입니다.

centres of Telopea and Carlingford. As a result, higher overall densities should be focused in these locations where more comprehensive planning work has been undertaken or is in the process of being completed. Densities in the Dundas area should generally be lower to reflect its position in the centres hierarchy.

3. The proposed FSRs of 4:1 and 5:1 and building heights of 26m, 40m and 80m are not considered appropriate for Dundas. This centre is characterised by predominantly low density development and densities of those proposed are significantly out of context. As previously mentioned, although located within the future light rail corridor, this suburb is small and has not been identified as priority / urban renewal precinct nor is it subject to any current master planning by the State Government or Council. As a result, it cannot be compared to other precincts that have been identified for significant future redevelopment and uplift, such as Telopea.
4. Of the 18 lots nominated in the Proposal, less than half appear to be owned by the proponent which results in the layout of the site being grouped into three different clusters. In this circumstance, Council doesn't support proposals where the lots are not contiguous.
5. The proposed design appears to be based on ownership patterns that result in the greatest density being located on an arbitrary mid-block location, rather than density being allocated based on urban design principles. A configuration of this nature is not supported.
6. The Planning Proposal makes assumptions regarding the future development of the whole precinct; however, it does not analyse the connections with the adjacent areas. In addition, the plan shows the incorrect location of the future light rail station, which appears to benefit the proponent's land and therefore influence the positioning of higher densities on the subject site. The correct location of the future light rail stop is on the northern side of the Dundas centre where the existing heavy rail station is situated.
7. The existing B1 Neighbourhood Centre zone is considered sufficient to service the needs of the community and additional non-residential floor space is not required at this point in time. In addition, the focus of commercial activities should remain around the train / future light rail station to ensure the core of the centre is not compromised.

Traffic and Transport

8. The Traffic Impact Assessment undertaken by Traffix uses the RMS rates for Metropolitan Regional (CBD) Centres to determine the parking rates for the proposed development, which is considered inappropriate for the Dundas centre as it does not generate a high level of local employment. The use of this rate results in a low number of parking

spaces which causes spill over parking to be experienced in surrounding streets. Instead, the higher parking rate for sub-regional centres is considered more appropriate.

9. The trip generation rates assumed in the Planning Proposal (0.19 in AM peak and 0.15 in the PM peak) are lower than those used for nearby residential developments and are not considered appropriate as they result in an underestimation of the traffic generated by the proposed development. The trip generation rates should be based on surveys of the existing high density residential properties.
10. Vehicular access to and from the Dundas centre is limited and the cumulative traffic impacts that will be experienced by residents of Dundas and the broader precinct should the proposed densities be achieved would not be considered acceptable without significant upgrades to the traffic network.
11. The proposed development will place a significant increase in demand for existing public transport services and the proposed light rail. The proposed development at the larger centres of Telopea and Rydalmere will result in these areas becoming key trip generators which will impact on the available capacity within the light rail network at Dundas.
12. Existing walking and cycling infrastructure are limited and key links to destinations such as Dundas station, Kissing Point Road, Victoria Road, Sydney Olympic Park and Western Sydney University at Rydalmere are lacking and / or unsafe. A commitment to contributing to upgrading walking and cycling facilities should be included in the Proposal, with any proposed links to be consistent with Council's *Parramatta Ways* strategy and *Parramatta Bike Plan*.

Open Space

13. The current proposal does not provide and / or adequately address the provision of communal public open space and is inconsistent with Council's draft Social Infrastructure Strategy (SIS), which specifies that high density residential developments are required to provide a minimum of 20% of the site area as open space.
14. The adjacent 'Winjoy Reserve' is the only significant public open space within an easy walking distance of the site. However, it is not sufficient in size (0.35ha) to accommodate the open space demand generated by the proposed development, nor does it provide adequate facilities to meet the needs of the community. A minimum of 0.5ha is required for a local park as per the State Government's *'Recreation and Open Space Planning Guidelines for Local Government'*. Open space provision for residents needs to be considered on a broader, more strategic scale to ensure appropriate access is provided for current and future residents.

15. Dudley Street Reserve is Council-owned land and should therefore not be utilised for private development, as shown in the proposal. In order for this land to be purchased and redeveloped, it would need to be reclassified to 'operational land' as per the requirements of the *Local Government Act 1993*. As such, the proposal should show this land as open space.

Social Outcomes

16. Insufficient information has been provided with this proposal regarding the likely demand for community facilities resulting from the proposed development or options and actions to increase social infrastructure to meet the needs of new residents. A Statement of Environmental Effects and Social Impact Assessment need to be provided to enable a proper assessment of the potential social impacts of this development to be undertaken.
17. Information to be included in any Social Impact Assessment should cover estimated generated demand and options for provision to meet this demand for:
- Library space
 - Community meeting space
 - Childcare- long day care and Out of School Hours (OOSH)
 - Recreation
 - Affordable housing
18. In addition, the following information needs to be provided as part of the planning proposal for the site:
- Estimated number of new residents: As a guide, the average household size for Dundas in 2016 is 2.74 persons.
 - Proposed dwelling mix: A unit mix should be provided to cater for all household types, with a preference for 3 bedroom units being located on the ground floor.
 - Affordable housing: No contribution to the provision of affordable housing has been included and should be provided at a rate of 10% in accordance with Council's draft Affordable Housing Policy (2017).
 - Community Infrastructure: No reference is made to the provision of community facilities on or off-site, which is a requirement for developments of the proposed scale.

Conclusion

19. Council has significant concerns regarding this Planning Proposal and the cumulative impacts it will have on the character and liveability of Dundas should it proceed in its current form. As a result, Council officers are recommending that this Planning Proposal be **withdrawn** until such time that Council has undertaken the necessary work to establish a

strategic direction for this suburb. Council will be undertaking a strategic review of precincts along the entire length of the light rail corridor. The timeframe for when this precinct will be reviewed is expected to be established by Council prior to the end of this year. Council officers would be happy to discuss this with you in more detail if required.

Please contact Amberley Moore, project Officer Land Use Planning, on 9806 5115 should you wish to discuss this letter.

Yours sincerely

A handwritten signature in black ink, consisting of several overlapping, stylized strokes that form the name 'Michael Rogers'.

Michael Rogers
Service Manager - Land Use Planning