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Amberley Moore  
Amoore@cityofparramatta.nsw.gov.au

## **REPLY TO COMMENTS REGARDING PLANNING PROPOSAL FOR 56-72 DUDLEY STREET AND 55-71 CROWGEY STREET DUNDAS**

Thank you for providing comments on the Planning Proposal which was lodged with Council in December 2017.

Since lodging this Planning Proposal the preparation of the Dundas Station Urban Design Report and Visioning has been commissioned to assist with the consideration of the Planning Proposal. This additional urban design exercise has been conducted by Urbis who, you will note, are preparing the urban design work relating to the Telopea Masterplan by the NSW Department of Planning and Environment.

The revised submission provides Council with the following:

- A peer review of the urban design analysis for Dundas.
- Testing of the impact of the proposed building envelope including shadow and amenity impact analysis
- Urban context analysis to identify key issues and opportunities for the Dundas Station Precinct, including the site's strategic and local positioning
- Identification of a preferred structure plan to shape the master plan for the Dundas Station Precinct.

Resulting from the additional urban design work some changes have been made to the Planning Proposal including: amendments to the proposed zoning of land, revised proposed maximum building height and revised proposed maximum floor space ratio.

This letter is submitted to Council for review along with a revised Urban Design Report by Aleksandar Design Group as well as the Dundas Station Precinct Urban Design and Visioning Report completed by Urbis. This additional and revised submission form the formal reply to the issues outlined in your letter of 3 May 2018.

As a preliminary statement, it must be stated that we find the content of Council's letter alarming and the position presented in your letter appears to be premised on no published or known Planning Strategy or Policy Framework. Nonetheless, this letter



provides a reply to the matters raised in your letter using consistent reference numbering.

The Planning Proposal is specific to land immediately proximate to the light rail station. The analysis appropriately considers the broader redevelopment of the Precinct, beyond the land that is the subject of the Planning Proposal. The State Government is committed to the over \$2 billion investment in the light rail.

There is no strategic justification to delay the rezoning of land proximate to the light rail station at Dundas. In fact, there is a strategic imperative to ensure that the State Government investment in the Parramatta Light Rail, that is on schedule to be opened in 2023, is provided with appropriate patronage that dovetails with the opening times. This Planning Proposal will facilitate timely patronage, in a location that is indisputably appropriate for increased density. The delaying of this Planning Proposal for the completion of a Dundas wide series of studies and design tasks, to then be followed by a rezoning process, is appropriate for land further away from the station. However, the locational attributes of the subject site, justifies the immediate rezoning of the land.

### **Strategic Merit**

1. The letter says that within the current strategic planning framework, “it is not envisaged that Dundas will be a major centre along the light rail route.” However, there is no known Planning Strategy or Policy Framework which deals the proposed hierarchy of centres along the proposed light rail route.

The known Policy Framework comprises A Metropolis of Three Cities - Greater Sydney Region Plan, the Central City District Plan, the Greater Parramatta and Olympic Peninsular Plan and the Greater Parramatta Priority Growth Area. Not one of these Strategic Plans has published a centres hierarchy policy or framework.

The Parramatta Light Rail is a key city shaping infrastructure project with the NSW Government granting approval for construction which will commence by the end of 2018. The site is located less than 50m from Dundas station with this station located between the Parramatta CBD and Camellia facilitating the capacity to be redeveloped into a vibrant mixed-use precinct.

By 2023, Dundas will be connected to major employment and health precincts including: the Westmead Health Precinct, Parramatta North Urban Transformation Precinct, the new Western Sydney Stadium, the new Powerhouse Museum, the 3 Western Sydney University campuses, the renewal of Rosehill Race Course and Camellia Precinct.

The most concerning matter raised in your letter is that Council would prefer to pass on the opportunity to encourage patronage to the new Parramatta Light Rail, to facilitate the opportunity for the future development to deliver a high-quality mix of new and affordable dwellings along the Parramatta Light Rail Corridor.

Government commitment to the funding and delivery of the Parramatta Light Rail is the genesis to create opportunities for urban revitalisation for land that is ideally located such as the subject site.

### **Density, urban design**

2. As stated above, there are no published Strategic Plans which provide for Dundas as a supporting centre to the major centres of Telopea and Carlingford.

This contradicts recent advice from the NSW Department of Planning who are advocating the consideration of each centre along the light rail route to be planned for depending on site constraints and locational characteristics.

This site is ideally located in terms of the Parramatta CBD, in fact being closer to the Parramatta CBD than Telopea. The land subject to the Planning Proposal is also generally flat which makes it prime land for redevelopment, as opposed to the challenging topography in and around both Telopea and Carlingford.

Again, it is stated that there is no known policy basis for stating that Dundas should generally be lower in density to reflect an unknown centres hierarchy.

3. The letter states that Dundas centre is characterised by predominantly low-density development and the proposed densities are out of context. Dundas is currently a centre which relies heavily on private vehicle ownership. The proposed city shaping Parramatta Light Rail will transform Dundas bringing it forward from the current low-density housing village to a smart city with new innovative developments as proposed in this Planning Proposal.

Considering the peer review process undertaken by Urbis the proposed FSR and height distribution has been amended.

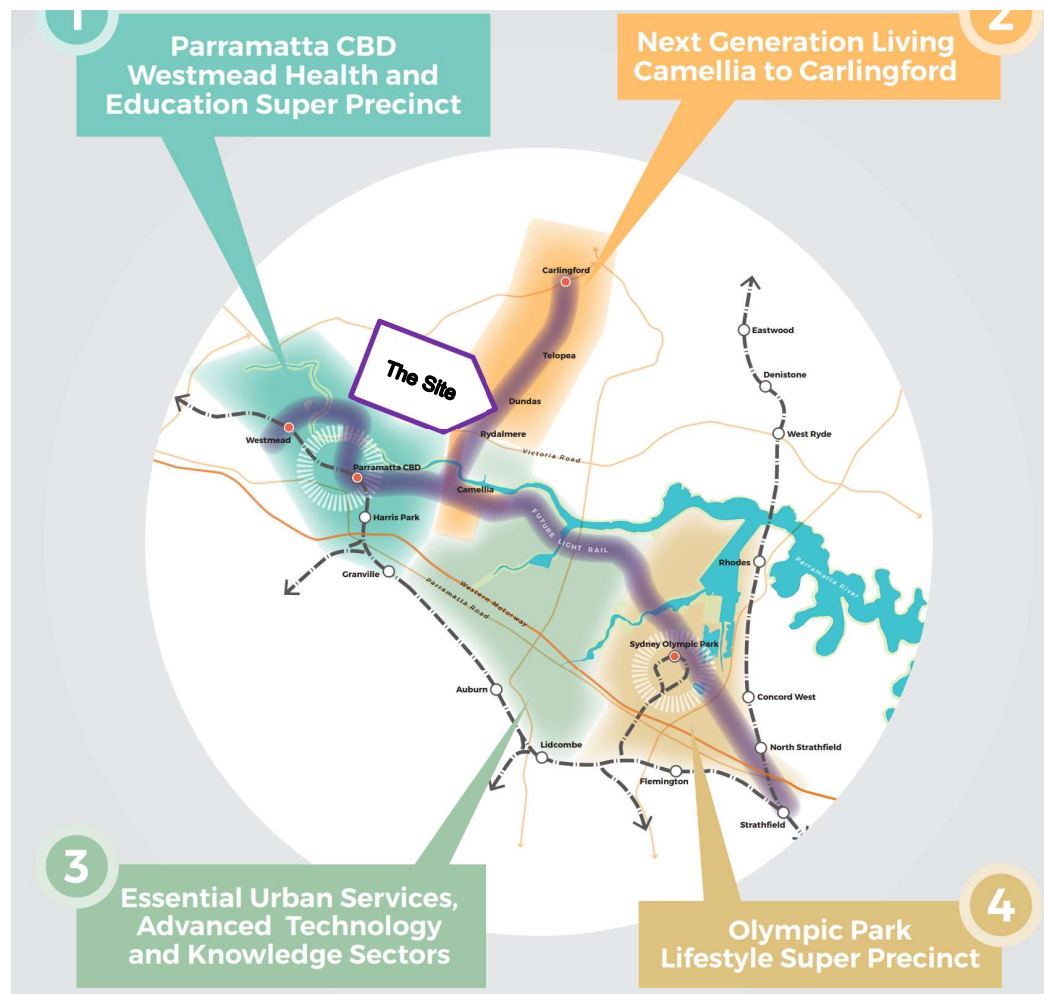
The revised Planning Proposal seeks building heights that range from 25 storeys down to 8 storeys and a corresponding average FSR of 4.2:1, relating to the subject land.


The comments provided in your letter such as “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” are key comments that need to be addressed individually.

The first comment which is about the size of the suburb has no valid or reasonable planning merit. Council is requested to provide the planning reasons or background for this issue being raised.

The letter also states that Dundas has not been identified as a priority/urban renewal precinct. This comment is factually incorrect as the land is located within the Greater Parramatta and the Olympic Peninsula (GPOP) as being located within the “Next Generation Living Corridor from Camellia to Carlingford”. The GPOP is the vision document which clearly states that this land is located within the corridor – as shown overleaf.





The GPOP clearly articulates that the Camellia to Carlingford Corridor will deliver 21st-Century living, learning and leisure district. The Corridor, which is also known as the northern GPOP spur, is envisioned to comprise a mix of medium to high-density housing types with nearby education, research, retail, recreation and entertainment facilities providing all the conveniences of 'inner-city' living.

The delivery of a truly smart, vibrant and inclusive communities will not come from a planning regime that involves delaying the delivery of a high quality, high density mixed use and residential development at the heart of the Dundas precinct. The proposed additional housing will contribute to the creation of goal the '30-minute city'.

The final comment highlighted under this issue relates to the absence of master planning undertaken by State Government or Council. The purpose of the peer review and component of work undertaken by Urbis and submitted with this updated Planning Proposal is to deliver on this masterplan. This work provides for:

- A vision for the urban renewal of Dundas that can be used by council or DPE for further detailed investigation
- Positioning for the Dundas Station Precinct in the greater context of Parramatta. Ensure that the visioning of the precinct aligns with the emerging planning direction of Parramatta and the Central City District
- Analysis of the site and context to unlock the potential of Dundas precinct, ensuring the master plan responds to the neighbourhood context
- Proposes a set of place-making strategies to guide the renewal of Dundas precinct
- Provides a rationale for the proposed new built form and density supported by key urban design principles
- Provides a concept plan and rationale for the enhancement of Dundas Precinct's public domain.

The master plan is presented to Council for consideration with the revised Urban Design Report and revised Planning Proposal.

4. The Planning Proposal relates to all the land within a series of contiguous development blocks as shown in this updated submission. The identification of land ownership was merely provided to assist Council's understanding that the client has a serious stakeholder in the precinct and to show the lands that have already been acquired/entered into future ownership agreements.

5. The proposed design is clearly not based on ownership patterns and this is re-enforced in the Dundas Station Precinct Vision Report by Urbis.
6. The peer review carried out by Urbis and the updated Urban Design Report seek to provide Council with further details of the whole precinct and analysis of connections within adjacent areas. The corrected location of the future light rail station is shown in the updated plans.
7. Further detailed consideration of the commercial strip serving Dundas is provided in the peer review by Urbis. The scale of proposed B1 Neighbourhood zone is not proposed to be amended under this Planning Proposal, however, it is recommended that a B4 Mixed Use zone be introduced to land that directly fronts the light rail stop. This is essential to ensure there is capacity to deliver an activated ground floor level with the ability to allow land uses that will serve the residents. At present there is no metro scale supermarket facilities within Dundas and the proposal seeks to unlock this problem by allows a future small-scale supermarket to enter this precinct. A truly walkable and liveable smart city can only be created where this opportunity exists.

A light rail station will undeniably bring new population to Dundas and the ability to cater for the additional population would be a significant oversight by Council.

8. The suggestion that higher parking rates need to be applied at Dundas is senseless. There is going to be a light rail stop within 200m of the site which is frequented by services every 7.5minutes through to the Central City. The Parramatta light rail is a city shaping infrastructure project that will see changes in the way people live, commute to work, university and generally patterns of travel.

Any suggestion that higher parking rates be applied is inconsistent with policy of the City of Parramatta which encourages minimal car parking in locations serviced by public transport.

There could not be a better location to reduce on site car parking.

9. Trip generation rates should not be based on surveys of existing high density residential development. It again is reiterated that there is going to be a light rail stop within 200m of the site which is frequented by services every 7.5minutes through to the Central City. The Parramatta light rail is a city shaping infrastructure project that will see changes in the way people live, commute to work, university and generally patterns of travel. Any suggestion that higher parking rates be applied is inconsistent with policy of the City of Parramatta which encourages minimal car parking in locations serviced by public transport.

There could not be a better location to reduce on site car parking.

10. The traffic statement submitted with this Planning Proposal considers the local traffic impacts. The site cannot be looked at in isolation and it is agreed that the cumulative impacts are important, but this land offers a unique opportunity to create a public transport orientated development in the 30-minute scenario.

This undeniably the location to support high density development with less car parking and therefore minimal impact on the local traffic network. Nonetheless, the potential traffic impacts are considered and presented in the traffic statement submitted with this Planning Proposal.

11. Council raises concern about the impact of development on the patronage of public transport. Please provide further technical basis relating to this issue. It seems to contradict all known government policies relating to transport orientated development.
12. Walking and cycling connections have been considered on a precinct wide basis and formed the revised details of this Planning Proposal. Commitment will be given to the required facilities and upgrades as part of the Planning Proposal.
13. The master plan will embrace the natural setting of the precinct and activates existing natural amenities to shape a public domain that is of an unique offer by Dundas Station Precinct. The provision of connection between the natural amenities and public amenities is key in delivering an engaging, inviting and attractive public domain. The main initiatives under this strategy includes:
  - a. Enhance existing natural amenities within the precinct.
  - b. Form a defined green corridors and networks to connect the natural amenities together.
  - c. Integrate these natural amenities with the social infrastructure and public amenities within the precinct.
  - d. Provide series of private open spaces to retain the neighbourhood living character of Dundas.
14. The proposal incorporates an area of new public open space this area of new public open space is specifically designed to complement and build up the existing reserve at Winjoy Reserve which is currently under-utilised. A broader and more strategic assessment of local areas of public open space is contained in the Urbis report submitted with this revised Planning Proposal.

15. Dudley Street Reserve is just a vacant parcel of land. The Planning Proposal is the appropriate mechanism to undertake reclassification of the land, if it is Council's desire to reallocate this land to private ownership. However, as it stands within the revised Planning Proposal, the land can be retained in public ownership and the classification retained.
16. A Social Impact Assessment can be carried out post-Gateway. However, it is noted that the proposal seeks to deliver a new linear park which interfaces with Winjoy Reserve, site-through links and a new cycle workshop facility that all offer an exceptional contribution to making the community of Dundas into a vibrant smart city.
17. Consideration of relevant contributions towards library facilities, a community meeting space, child care facilities, recreation facilities and affordable housing are all matters to be negotiated with Council.
18. An affordable housing contribution will be the subject of ongoing negotiations with Council. Contributions for affordable housing will be made in accordance with Council's adopted policy.
19. The Strategic Direction for this precinct is known and published in A Metropolis of Three Cities – Greater Sydney Region Plan, the Central City District Plan and the Greater Parramatta to Olympic Peninsula Plan. It is agreed that detailed master planning has not yet been prepared by Council or the State Government so in the absence of this we have completed the work and submit this to Council for review.


The subject land sits at the heart of the Dundas Station Precinct and benefits from its strategic location along the Parramatta Light Rail Corridor. The subject site will be serviced by the Parramatta Light Rail by 2023 which connects Dundas to Carlingford, Parramatta CBD and Westmead.

The Parramatta Light Rail is a city shaping infrastructure project that catalyses the opportunity to plan for the growth within Dundas along with the strategic precincts on this light rail corridor. The subject site stands to have access to broader range of employment, health services and educational facilities.

The entire precinct that has been studied at Dundas is supported by its natural topography and landscape setting with access to variety of green spaces and amenities.

The subject land comprises the key characteristics that make it ideal for revitalisation. Dundas is strategically located with light rail access (by 2023) to the Central City CBD, Westmead, and benefits from access to an established regional road network





The local topography of the precinct provides the prime opportunity for high density development with constraints that are normally associated with developing more challenging and sloping land.

The current land ownership patterns mean the precinct is mostly single lot owners, so site amalgamation is reasonably straight forward with only a small number of strata titled allotments.

Parramatta Light Rail is the genesis for the renewal and revitalisation of Dundas. The subject land is located at the centre of the Dundas Station Precinct and offers the opportunity to deliver a truly vibrant and smart village centre to assist with the delivery of a successful Dundas community.

The Planning Proposal describes how the intended outcome of the proposed LEP amendments align closely with the strategic directions established in State Government documents the Plan for Growing Sydney, A Metropolis of Three Cities – the Greater Sydney Region, the Central City District Plan and the GOPP.

It must be re-stated that this Planning Proposal is specific to land immediately proximate to the light rail station. The analysis appropriately considers the broader redevelopment of the Precinct, beyond the land that is the subject of the Planning Proposal. The State Government is committed to the over \$2 billion investment in the light rail.

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It is considered that the LEP amendments sought by the Planning Proposal will allow for the accelerated delivery of both mixed use and high-density residential development in an area which is well serviced by public transport and infrastructure and has been identified as a key urban renewal precinct. The Planning Proposal is considered to have strong merit based on a sound analysis of relevant planning considerations and is submitted to Parramatta City Council for consideration.



Adam Byrnes  
**Think Planners Pty Ltd**  
PO BOX 121  
WAHROONGA NSW 2076