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The General Manager  
City of Sydney  
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**Attention: Strategic Planning Department**

**RE: PLANNING PROPOSAL TO AMEND SYDNEY LOCAL ENVIRONMENTAL PLAN 2012 FOR  
ADDITIONAL BUILDING HEIGHT AND FLOOR SPACE RATIO FOR THE PURPOSE OF A  
MIXED USE TOWER**

**44-70 ROSEHILL STREET, REDFERN (LOT 1 DP 792628)**

Dear Sir/Madam,

This letter has been prepared by Willowtree Planning Pty Ltd on behalf of Redfern Rosehill Pty Ltd, and forms an appendix to the Planning Proposal for the amendment of *Sydney Local Environmental Plan 2012* (SLEP2012) to include additional building height and floor space ratio (FSR) on the site. The land subject to the Planning Proposal is described as 44-70 Rosehill Street, Redfern (Lot 1 DP 792628).

The proposed rezoning intends to facilitate the future development of the site for mixed use development comprising commercial and residential components. Building heights up to 99.6m and a 10.4:1 FSR are required to support the creation of a mixed use precinct on the site. The mix of land uses sought to be incorporated within the site are already permitted with consent in the relevant B4 Mixed Use zone pursuant to SLEP2012.

To demonstrate that the proposal satisfies the strategic merit test and has site-specific merit, an assessment has been carried out in accordance with Step 2 of the Department of Planning and Environment's (DPE) *A Guide to Preparing Local Environmental Plans*. It is noted that whilst not required for the purpose of submitting the Planning Proposal to Council, the merit test is considered relevant for the purpose of providing additional strategic justification for the proposal.

Yours faithfully,

Chris Wilson  
Director  
Willowtree Planning

## STRATEGIC MERIT TEST

Amendment to Sydney Local Environmental Plan 2012 for Additional Building Height and Floor Space Ratio for the Purpose of a Mixed Use Tower  
44-70 Rosehill Street, Redfern (Lot 1 DP 792628)

**Table 1. Strategic Merit Test**

<b>Merit Criteria</b>	<b>Merit Assessment</b>
The Planning Panel or Commission will undertake an assessment to determine whether the proposal:	
a) has strategic merit as it is:	
Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or	<p>The proposed rezoning is consistent with the draft Eastern City District Plan as it applies to the district as a whole and also to the Central to Eveleigh corridor, Sydney Metro, the Harbour CBD's Innovation Corridor specifically.</p> <p>With respect to Infrastructure and Collaboration, the proposal would support the transformation that is being pursued by various levels of government in conjunction with the Central to Eveleigh Urban Transformation Strategy and Sydney Metro. The future development would effectively align jobs and housing growth with new infrastructure, in accordance with Action 3.</p> <p>Being identified within the Central to Eveleigh Urban Renewal Corridor, the site is ideally located for new housing. By providing new residential accommodation in conjunction with ground floor commercial premises, mixed use development on the site would accommodate a wide range of people, as required by the Plan's Liveability Priorities. Housing affordability and choice would therefore be improved through the injection of additional housing supply and dwelling diversity. The proposal would contribute to the delivery of the 157,500 additional homes required by 2036. The immediate proximity of the site to major public transport (Redfern station and future Waterloo Metro) as well as existing and future jobs, services and educational establishments, contributes to a highly walkable, cycleable and vibrant mixed use environment that would be further enhanced through new mixed use development.</p> <p>In accordance with the District Plan's Productivity Priorities and conceptualisation of innovation corridors (which incorporate the site), the proposed mixed use development would deliver a range of affordable and flexible office spaces in a highly amenable and walkable precinct serviced by major public transport infrastructure. The co-location of new and diverse housing within mixed use development would integrate with the Plan's vision for the Innovation Corridor, and contribute to a vibrant working and living environment at all times of the day and night.</p>

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Commensurate with Sustainability Priorities, the proposed rezoning would also augment the efficiency with which land is used through the diversification and densification of uses that are highly compatible with surrounding development and coordinated with supportive infrastructure. The redevelopment of land that has been historically developed will promote the creation of a better quality environment built on the principles of sustainability.

More detailed review and assessment of the proposed rezoning in light of the draft Eastern City District Plan is provided within **Section 4.1.1.5** of the Planning Proposal Report.

As detailed in **Part D** of the Planning Proposal Report, the proposal is also consistent with other applicable state, regional and local strategic plans, including the NSW State Priorities, A Plan for Growing Sydney, Directions for a Greater Sydney, the draft Greater Sydney Region Plan, the strategic objectives for Sydney Metro, the Central to Eveleigh Urban Transformation Strategy, the Waterloo Urban Renewal Project and Sustainable Sydney 2030, particularly as they relate to providing additional housing in accessible locations, growing the economy, revitalising urban renewal corridors, coordinating land uses with transport and other infrastructure, and concentrating growth in designated strategic centres/corridors.

In particular, although not expressly included in the Central to Eveleigh Urban Transformation Strategy, the subject site presents significant opportunity to contribute to achieving the vision for the area owing to its immediate spatial proximity to the corridor. Mixed use high density development on the site contributes to the Strategy's '10 Key Moves' as follows:

- The development would contribute to the transformation of the area surrounding Redfern Station into a productive and liveable mixed use environment.
- The activation of streets and lanes as well as the delivery of new public open spaces, would enhance the pedestrian network and green network linking precincts within the corridor.
- The site would positively contribute to the new activity centre focused around the train stations, providing shops, cafes, public open

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	<p>spaces, jobs and housing to service the day-to-day needs of the community.</p> <ul style="list-style-type: none"><li>▪ New flexible commercial floor space would encourage the clustering of innovative and creative businesses and jobs.</li><li>▪ The concept built form demonstrates how high density mixed use development on the site may effectively integrate with the new stations and surrounding neighbourhoods.</li><li>▪ Additional housing on the site would introduce supply, diversity and affordable offerings.</li></ul> <p>The site is therefore of strategic value in catalysing the desired transformation of the Central to Eveleigh Corridor.</p> <p>Similarly, although not within the Investigation Area under the Waterloo Urban Renewal Project, the site is nonetheless considered to pose significant opportunity to catalyse the transformation of land that is so strategically-placed within 400m of both Waterloo station and Redfern station.</p> <p>Additionally, it is understood that DPE are currently preparing a Land Use and Infrastructure Plan (LUIP) for the Botany Road corridor. The LUIP recognises the strategic merit and suitability of rezoning land along the Botany Road corridor from Redfern to Green Square, thereby signalling the appropriateness of the proposed rezoning for the subject site.</p>
Consistent with a relevant local strategy that has been endorsed by the Department; or	<p>The proposed rezoning is consistent with local strategic plans including Sustainable Sydney 2030 (being Council's adopted Community Strategic Plan).</p> <p>As detailed in <b>Section 4.2.2.1</b> of the Planning Proposal Report, the future mixed use development would contribute to the realisation of the Strategy's overarching aspirations for a green, global and connected city, contribute to achieving many of the targets established by the Strategy and align with the ten (10) strategic directions for Sustainable Sydney.</p> <p>Through high density mixed use development, the proposal would revitalise the site, activate the surrounding public domain and enhance the overall amenity and vibrancy of the TOD precinct and corridor linking Redfern station and the future Waterloo Metro station. New spaces for businesses and innovation, new knowledge-intensive jobs, new dwellings, new affordable housing and new green spaces, all in immediate proximity of major public</p>

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	transport, would combine to contribute to economic, housing, social and environmental objectives.
Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognized by existing planning controls.	<p>The site falls within the catchment of the new Waterloo Metro Station and accordingly in the future will benefit from enhanced accessibility by public transport. Given this significantly augmented accessibility, the site is ideally located for new commercial and residential uses.</p> <p>It is also noted that Waterloo Metro station is intended to:</p> <ul style="list-style-type: none"> <li>▪ Revitalise the Waterloo precinct</li> <li>▪ Contribute to the NSW Government objective to transform Waterloo and Redfern</li> <li>▪ Support the extension of the CBD</li> <li>▪ Allow further development and expansion of the Global Economic Corridor between the Sydney CBD and Green Square</li> <li>▪ Provides additional connectivity to Australian Technology Park and Redfern Station</li> </ul> <p>High density mixed use development on the site would contribute to the revitalization of the Waterloo-Redfern corridor and support the southern extension of the CBD. This reconciles with the government's strategic objectives for Sydney Metro and Waterloo station specifically.</p> <p>The proposal also responds to the employment and housing targets identified within draft strategic planning documents, and accordingly would contribute to the provision of the required jobs and homes for the growing population.</p> <p>In particular, Redfern is located within the Digital Industries Hub and close to Creative Industry, Education and Knowledge Industry hubs, identified in City of Sydney's Economic Development Strategy. In accordance with the Strategy, the concept development would provide suitable commercial floor space to accommodate businesses in the creative, education, knowledge and digital industries, and relatedly to foster jobs growth in these priority industries.</p>
The Planning Panel or Commission will undertake an assessment to determine whether the proposal:	
b) having met the strategic merit test, has site-specific merit, having regard to:	
The natural environment (including known significant environmental values, resources or hazards)	The subject site is not identified in proximity of any area of biodiversity and accordingly the proposal

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	<p>would not exhibit any adverse impact on the natural environment, hazards or other resources. Rather the proposal relates to a site that has been historically developed and forms part of an established urban area.</p> <p>The site's redevelopment would create opportunities for development designed in accordance with the principles of Environmentally Sustainable Development (ESD), new public open spaces, the co-location of housing and jobs, and the promotion of active transport use through TOD.</p> <p>Further details of ESD are provided in <b>Section 4.3.2</b> of the Planning Proposal Report and the ESD Strategy Report at <b>Appendix 8</b>.</p>
The existing uses, approved uses and likely future uses of land in the vicinity of the land subject to a proposal	<p>The concept design has been informed by detailed site analysis and consideration of the surrounding context in order to provide an optimal development outcome that capitalises on the strategic potential of the land, uplifts the surrounding public domain and provides a high level of amenity.</p> <p>The envisaged high density mixed use development would be complementary to and supportive of surrounding land uses. In particular, the proposal responds to its surrounds by stepping down to provide an appropriate interface with more sensitive residential development to the south. As demonstrated in the Urban Design Report at <b>Appendix 2</b>, the design of the concept development significantly improves the amenity of the subject site, whilst protecting the amenity of surrounding sites including in relation to solar access, natural ventilation and privacy.</p> <p>The proposal would therefore introduce a transitional development that complements the range of surrounding land uses, integrates with the variety of built form densities in the general area, responds to the strategic location of the site and leverages new infrastructure investment (namely the Sydney Metro station at Waterloo).</p> <p>The proposed height and FSR are also generally consistent with high density development on other sites in proximity of Redfern train station, ensuring that the future development of the site would integrate with its built form context. New high density development within the urban renewal and transit corridors in the vicinity of Redfern station and Waterloo Metro station are also anticipated to define the future built form character of the surrounding</p>



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	<p>context. Key strategic policies guiding future development in Redfern/Waterloo establish the desired future vision of high density mixed use development revitalising the area and efficiently using strategically-located land.</p>
<p>The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.</p>	<p>The site is serviced by existing infrastructure that is capable of servicing higher density commercial and residential development. In particular the site is highly accessible by public transport, being within 300m walking distance of Redfern train station, 350m of the future Waterloo Metro station, 1.4km of Green Square station, 1.6km of Erskineville station and 1.8km of Central station. Bus stops situated along Gibbons Street and throughout surrounding streets provide connections through the Redfern suburb and to Sydney CBD, Marrickville, Eastgardens, Matraville and Port Botany via surrounding suburbs. Resulting from the proximity of the site to public transport, active transport networks and services, the site has been awarded a walkscore of 97 (walker's paradise, daily errands do not require a car) and a transit score of 100 (rider's paradise, world-class public transportation).</p> <p>As detailed in the Traffic Impact Assessment Report (<b>Appendix 3</b>), <i>the proposal is supportable on traffic planning grounds and will not result in any adverse impacts on the surrounding road network or the availability of on-street parking</i>. The net traffic generation volumes are of a sufficiently low order that once distributed on to the surrounding road network, the impacts of these volumes at the key intersections would be negligible and the intersections would operate as currently occurs.</p> <p>As described in <b>Section 4.3.3</b> of the Planning Proposal Report, based on the Community Needs Assessment (<b>Appendix 5</b>) the future population resulting from the concept development would be adequately serviced by existing and planned childcare facilities, health facilities and education facilities in the surrounding area. Given the pre-existing need within the City of Sydney for additional open space and affordable housing, the assessment recommends that open space and affordable housing would form appropriate considerations as part of a VPA.</p> <p>A draft VPA has been prepared to ensure the proposal provides significant public benefit through the dedication of land for open space and a laneway, the provision of affordable housing, the provision of affordable commercial space, and monetary</p>

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	contributions towards public art and landscape works in the public domain.
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The above assessment demonstrates that that the proposed rezoning for additional building height and FSR to support high density mixed use development on the site, exhibits strategic merit and site-specific merit. The proposal is consistent with key strategic plans for the site, corridor, precinct, district and Greater Sydney. Importantly, the proposal leverages new investment in Sydney Metro and will assist in the revitalisation of the precinct surrounding Waterloo station. Similarly, the proposal would provide an important contribution to the realisation of housing and jobs targets, and the creation of the designated Digital Industries Hub in Redfern. The future provision of high density mixed use development would be compatible with the natural environment, surrounding land uses and built form (existing and future), and infrastructure (existing and future).

It is therefore recommended that the Planning Proposal is supported by Council and that the necessary steps are pursued to enable it to proceed to Gateway Determination under Section 3.34 of the *Environmental Planning and Assessment Act 1979*.

Yours faithfully,



Chris Wilson  
Director  
Willowtree Planning