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## PRE GATEWAY-REVIEW APPLICATION FOR PLANNING PROPOSAL FOR 17-20 LOFTUS CRESCENT HOMEBUSH

### INTRODUCTION

This rezoning review application is lodged for the Planning Proposal for 17-20 Loftus Crescent Homebush. This letter provides a summary of the history of this Planning Proposal, details of dealings with Strathfield Council, an inventory and digital copy of the material submitted with this rezoning review application as well as details of the strategic and site specific merit for this Planning Proposal. An updated rezoning review application form is also provided separately.

This Planning Proposal was originally lodged with Strathfield Council on 14 March 2018 requesting that the permitted floor space ratio be increased to 7:1 and the maximum building height be increased to 75m. Council's Principal Strategic Planner provided a letter dated 29 March 2018 stating that the proposal is inconsistent with the Parramatta Road Corridor Urban Transformation Strategy and requested that it be revised.

In response an updated Planning Proposal was submitted on 27 July 2018 which reduced the floor space ratio proposed to 3.6:1 to align with the Parramatta Road Corridor Urban Transformation Strategy. This was also later revised again with a 3<sup>rd</sup> submission of updated documentation on 7 September 2018.

To this date, the Council has not formed a position regarding the subject Planning Proposal and I would like to formally confirm that the council has failed to indicate its support 90 days after the proponent submitted a request. Therefore, this letter along with the supporting information is submitted as a formal rezoning review.

### ORIGINAL PLANNING PROPOSAL SUBMISSION – 14 MARCH 2018

The original Planning Proposal submission related to land at 17-20 Loftus Crescent Homebush as depicted overleaf. A copy of the Planning Proposal Report and accompanying Urban Design Report is provided at **Appendix 1 and 2**. It is important to note that the Planning Proposal report contains the following statement on page 5 which says, "Support for the planning proposal is sought; and the subsequent referral to the Department of Planning and Environment for Gateway determination and public exhibition."

The land subject to the Planning Proposal is shown in Figure 1 overleaf.

Figure 1: Aerial photograph of the subject site (Source: Google Maps).



 Subject site

The Planning Proposal sought to amend the Strathfield LEP 2012 to allow for the redevelopment of the site for the purposes of high-density housing by:

- Amending the Maximum Height of Building control for Strathfield LEP 2012 to 75m
- Amending the Floor Space Ratio Map for Strathfield LEP 2012 to 7:1 on the site.

The Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) recommends for the site a maximum height of 75m and a maximum FSR of 3.6:1.

In response to this submission, Council's Principal Strategic Planner Ms Rita Vella provided feedback on 29 March 2018. A copy of this letter is provided at **Appendix 3**.



The letter requests that the Planning Proposal be amended to be consistent with the Parramatta Road Corridor Urban Transformation Strategy and that further details relating to traffic and urban design matters be provided.

## REVISED PLANNING PROPOSAL SUBMISSION – 27 JULY 2018

In reply to the letter from Council, the Planning Proposal was revised, and a copy of the updated Planning Proposal report is provided in **Appendix 4** with the updated Urban Design Report provided in **Appendix 5**.

The key changes introduced in this revised Planning Proposal were the inclusion of 2 additional properties at 23 and 24 Loftus Crescent and the reduction of the proposed floor space ratio. The sites now included are shown in Figure 2 below.

**Figure 2: Aerial photograph of the subject site (Source: Google Maps).**



 Subject site

This Revised Planning Proposal sought to amend the Strathfield LEP 2012 to allow for the redevelopment of the site for the purposes of high-density housing by:

- Amending the Maximum Height of Building control for Strathfield LEP 2012 to 75m
- Amending the Floor Space Ratio Map for Strathfield LEP 2012 to 3.6:1 on the site.

The Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) recommends for the site a maximum height of 75m and a maximum FSR of 3.6:1. This Planning Proposal has been revised to ensure the proposal aligns with the PRCUTS with the same recommended FSR for the subject site of 3.6:1 and recommended maximum building height of 75m.

Again, it is important to note that the Planning Proposal report contains the following statement on page 5 which says, “Support for the planning proposal is sought; and the subsequent referral to the Department of Planning and Environment for Gateway determination and public exhibition.”

#### CURRENT PLANNING PROPOSAL SUBMISSION – 7 SEPTEMBER 2018


Further to the July submission, the Planning Proposal was again revised but only to remove the properties at 23 and 24 Loftus Crescent and provide an updated Traffic Impact Study. In this final submission a revised Planning Proposal report was provided, which is reproduced in **Appendix 6**, an updated Urban Design Study – see **Appendix 7** and the Traffic Impact Study – see **Appendix 8**. A letter was also provided to Council with this submission, outlining the key features of the revised Planning Proposal which is reproduced in **Appendix 9**.

Again, it is important to note that the Planning Proposal report contains the following statement on page 5 which says, “Support for the planning proposal is sought; and the subsequent referral to the Department of Planning and Environment for Gateway determination and public exhibition.”

#### MEETINGS WITH STRATHFIELD COUNCIL

Council’s Principal Strategic Planner, Ms Rita Vella has kindly met with us on 3 separate occasions about this Planning Proposal, on 3 April, 31 August and 16 October 2018. We appreciate that Rita has made time to meet with us and discuss Council’s advice on the Planning Proposal.

It is our view, that Council has had sufficient time to review the Planning Proposal which seeks a maximum floor space ratio of 3.6:1 and a maximum building height of



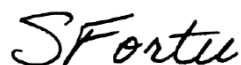
75m at 17-20 Loftus Crescent Homebush which is entirely consistent with the Parramatta Road Corridor Urban Transformation Strategy.

Council has not reported the Planning Proposal to a Local Planning Panel or Council meeting and has not yet formed a formal position regarding the Planning Proposal. In this regard, we confirm the council has failed to indicate its support 90 days after the proponent submitted a request. Therefore, this letter along with the supporting information is submitted as a formal rezoning review.

To support this rezoning review a Strategic and Site-Specific Merit Assessment is provided in **Appendix 10**.

Should you require any further details, I can be contacted on 0430 807 921.

Kind regards,



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## **APPENDIX 1**

PLANNING PROPOSAL REPORT SUBMITTED ON 14 MARCH 2018

## **APPENDIX 2**

URBAN DESIGN REPORT SUBMITTED ON 14 MARCH 2018

## **APPENDIX 3**

FEEDBACK LETTER FROM COUNCIL ON 29 MARCH 2018

## **APPENDIX 4**

REVISED PLANNING PROPOSAL REPORT SUBMITTED ON 27 JULY 2018

## **APPENDIX 5**

REVISED URBAN DESIGN REPORT SUBMITTED ON 27 JULY 2018

## **APPENDIX 6**

FURTHER UPDATED PLANNING PROPOSAL REPORT SUBMITTED ON 7 SEPTEMBER 2018

## **APPENDIX 7**

FURTHER UPDATED URBAN DESIGN REPORT SUBMITTED ON 7 SEPTEMBER 2018

## **APPENDIX 8**

UPDATED TRAFFIC IMPACT STUDY SUBMITTED ON 7 SEPTEMBER 2018

## **APPENDIX 9**

LETTER TO STRATHFIELD COUNCIL EXPLAINING THE PROPOSED AMENDMENTS SUBMITTED ON 7 SEPTEMBER 2018

## APPENDIX 10

### STRATEGIC MERIT TEST

**Is the proposal consistent with 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?**

Yes. The relevant strategic plans for consideration include the Metropolis of Three Cities – Greater Sydney Region Plan 2018, the Eastern City District Plan 2018 and the Parramatta Road Corridor Urban Transformation Strategy 2016.

#### **A Metropolis of Three Cities – the Greater Sydney Region Plan**

The Planning Proposal is aligned with these key themes, directions, metrics and objectives by:

1. Infrastructure and collaboration. The subject land is located within 200m of the Homebush train station and the existing local centre which is on the southern side of the train line. The site is located within easy access of exiting health services infrastructure as well as existing schools including Homebush and Strathfield North Public Schools. The site is located just 14km to the west of the Sydney CBD and an easy train ride that is less than 30 minutes to Central Station which is well within the 30-minute city scenario.
2. Liveability. The reference architectural design drawings provided with this Planning Proposal and the urban design study show that liveability for the future residents is a primary consideration for the future building design. Solar access and cross ventilation has been maximised along with general compliance with the requirements of the Apartment Design Guide. The proposed activated landscaped frontages along all street setbacks. The pedestrian environment will be activated and improved because of this Planning Proposal connecting the residents through from Homebush to the train station.
3. Productivity. The proposal capitalises on the existing Homebush town/local centre and will ensure there with sustainable future growth within this existing centre. The proposal creates a more accessible and walkable city with enhanced activation to pedestrian links and opportunity for bicycle riding as well as promoting additional local jobs through the placement of additional residents within Homebush.

4. Sustainability. The Planning Proposal facilitates building capacity based on existing and committed infrastructure. This seeks to shape strong, connected community making the revitalised precinct at Homebush more resilient.

The Greater Sydney Region Plan presents polycentric approach to Sydney which reinforces the significant role of Sydney as the Eastern City as well as Parramatta as being at the heart of the Central City within Greater Sydney. Greater Sydney experiences a step change in population growth, with population growth levels being revised even further upwards since the release of the Plan for Growing Sydney. To accommodate this population growth and respond to issues of housing affordability housing supply in key locations such as Homebush need to be accelerated.

Urban renewal is a key priority particularly with the focus of new housing in existing centres with frequent public transport that can carry large number of passengers and in locations that have already the community infrastructure in place such as medical services, social services, educational facilities, recreational opportunities and employment. This clearly places emphasis on the proposed revitalisation of Homebush as an ideal location to deliver this accelerated housing, more affordable housing typologies and a greater variety of housing choice. This housing can be brought forward only if the planning controls are made contemporary as represented in this Planning Proposal.

### **Eastern City District Plan**

The Eastern City District Plan sets out the priorities and actions for this District and these are structured around the same key themes as presented in the Greater Sydney Region Plan. As relevant to the subject site the importance of the Eastern City, which incorporates Sydney CBD, North Sydney CBD, Barangaroo, Darling Harbour, Pyrmont, and more. Growing this CBD in terms of both jobs and housing are continually emphasised in the District Plan. The Planning Proposal seeks to deliver both additional housing but also jobs within a 30-minute city scenario.

Expediting the delivery of housing brings more dwellings to the market which in turn drives prices down. Delivering more dwellings and within shorter timeframes aims to respond to the current housing crisis in Sydney where scarcity has resulted in an affordable priced housing shortage. The Planning Proposal seeks to deliver housing to the market quickly and in a highly liveable location which is within the 30-minute city scenario.

In summary, this Planning Proposal seeks to deliver on the vision set forward in the Eastern City District Plan by:

1. Increasing diversity of housing choice.



2. Delivering housing to meet both the 5 and 20-year strategic housing supply targets. Strathfield is scheduled to deliver more than 3,650 new homes over the coming 5 years which is ambitious target that can only be met with significant increases to permitted building heights and floor space ratios.
3. Expediting the delivery of new housing stock to ease the pressure of demand resulting in a generally more affordable priced housing product.
4. Contribution to energy efficiency through aims to deliver a development that meets environmental performance criteria.
5. Reduced emissions through both building environmental performance but also through reduction in reliance on private vehicle travel. Focusing increased housing on the subject site which is highly accessible to local bus and train services means that future residents are more likely to walk, cycle and use integrated public transport systems.
6. Enhancing the role of Homebush/Strathfield as the economic anchor with the vision to deliver both jobs and housing.

The objectives of the Planning Proposal are considered to align closely with the documented priorities for the Eastern City District.

### **Parramatta Road Corridor Urban Transformation Strategy**

The Parramatta Road Corridor Urban Transformation Strategy also published in November 2016 identified areas that will be the focus of growth and change along the Parramatta Road corridor. The Strategy indicated that the numbers of people living in these areas is expected to rise with 27,000 new homes over the next 30 years. The population increase in these areas is 3.2 percent of Sydney's overall expected population growth of 1.6 million.

The Strategy identifies Homebush as 1 of 8 urban renewal precincts that have been identified for future growth given its very good access to transport and employment opportunities currently in the Harbour CBD & Parramatta CBD and expected rapid growth in this locality. The Strategy identified 7 strategies for transformation of the Corridor and after reviewing these principles the Planning Proposal is aligned with all relevant principles namely:

#### *Housing choice and affordability*

- The Planning Proposal seeks to expedite delivery of new housing to the market bringing forward supply to meet the growing demand therefore relieving pressure on housing prices thus, providing lower cost market housing.

- The typical floor plans provided with this Planning Proposal demonstrate skilful consideration of a range of compact and efficient housing designs that are seeking to provide flexible apartment designs to meet the needs of a range of future residents.

#### *Diverse and resilient economy*

- The proposal seeks to deliver increased density in a location that is already well-serviced by public transport, local bus services and the arterial road network.
- The mixed-use zone encourages ground floor commercial uses which have been incorporated into this proposal. Co-location of multiple uses and offering flexibility means Homebush can grow as needed to suit the needs of the future residents making this a diverse and resilient community and economy.
- Commercial spaces at the ground floor and podium levels are purposely designed to allow flexibility for future uses. These spaces may in future be occupied as larger premises or further broken down into smaller commercial suites.
- The ground floor also delivers development which is fully integrated with the public domain including activation of the building edges, a publicly accessible ground floor activation which will assist with the creation of a vibrant and thriving village atmosphere. The pedestrian links that are enhanced will also assist with increasing the walkability of Homebush, encouraging public transport patronage and the sense of community safety.
- The typical floor plans provided for the residential component of the development also show skilful layout designs to cater for the evolution of housing by providing the future residents with flexible spaces. The internal layouts are designed to cater for the changing demands of the community.

#### *Accessible and connected*

- Promotion of sustainable transport choices is one of key drivers to delivery of increased building height and density on this site.
- The site is closely connected to the revitalised North Strathfield Bakehouse precinct (being just 800m walking distance away from the site) which delivers a highly activated and vibrant village centre for future residents. These alternative travel choices will result in increased trips on foot or by bicycle and reduce dependency on motor vehicles.

#### *Vibrant communities and places*

- The Planning Proposal seeks to deliver a 15-minute neighbourhood through delivering housing with improved walkability, cycling and safety that will support healthier communities.

- The proposed increased density and building height on this site is very much aligned with the Strategy to improve walkability, housing choice, provision of useable/safe open spaces, commercial space for local services and infrastructure all within an exceedingly accessible location.

#### *Green spaces and links*

- The proposed options for redevelopment show the site can deliver valuable contribution to the pedestrian network through high quality public domain embellishment and activation of this site being so closely connected to the train station.
- 100% of proposed dwellings within the development site will be conveniently located within safe walking distance of high quality open space and public domain areas, within Loftus Crescent and noting that the site is within 3km of Sydney Olympic Park which clearly is one of most valuable recreation spaces in Western Sydney.
- Building setbacks as prescribed by the Strategy that aim to achieve new green setbacks are accommodated.

#### *Sustainability and resilience*

- At the detailed design stage, further details relating to meeting water and energy reduction targets will be explored including car share take-up rate with the aim of reducing car use.
- A green travel plan is recommended to be implemented as part of the proposed development to facilitate a modal shift towards public transport usage as opposed to car usage.

#### *Delivery*

- The delivery actions under this principle are related to actions by the Greater Sydney Commission and are generally not applicable to a Planning Proposal.
- The Strategy anticipates that by 2050 the populations within Homebush will increase by 19,570 and Homebush is projected to provide an additional 9,450 homes. The Planning Proposal presents a development scheme that will deliver a significant contribution to new housing supply for Homebush.

The proposed amendment to the zoning combined with the maximum building height controls and floor space ratio is consistent with the vision set forward in the Parramatta Road Corridor Urban Transformation Strategy.

These strategic plans have been considered in further detail under the heading Part 3 - Justification of this Planning Proposal report – see Appendix 6.

**Is the proposal consistent with a relevant local strategy that has been endorsed by the Department?**

Yes. The relevant local planning strategy document is the Strathfield 2025 – Community Strategic Plan (June 2012).

**Strathfield 2025 – Community Strategic Plan (June 2012)**

Strathfield 2025 is the Community Strategic Plan for the Strathfield local government area. Strathfield 2025 is described as a long-term vision for the Strathfield Local Government Area and links to the long-term future of Sydney. The Plan describes Homebush as a village that needs revitalisation and future design excellence to facilitate delivery of improved quality transport links and attractive public spaces and identifies Homebush as a suburb that will undergo urban renewal.

Strathfield 2025 identifies a community strategic plan, resourcing plan and delivery plan highlighting the vision for future growth within Strathfield and Homebush. Specifically, the redevelopment of the subject site will contribute to the economic growth of Homebush and revitalisation of this land which is just 200m from Homebush train station. The Planning Proposal will encourage diversity and liveability of places and will enhance the status of Homebush as a village in which people want to reside, work and visit.

**Is the proposal responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls?**

Yes. The Planning Proposal is essentially responding to the work completed by Urban Growth in the Parramatta Road Corridor Urban Transformation Strategy and as described above the proposal responds to all relevant and contemporary strategic planning policy documents.

## SITE SPECIFIC MERIT TEST

### **Does the proposal have site-specific merit, having regard to:**

#### **The natural environment (including known significant environmental values, resources or hazards)?**

Yes. The anticipated environmental effects associated with the higher-density development that will be permitted by the planning proposal include:

##### **Traffic and access**

A traffic impact study is provided in Appendix 8 which evaluates the Planning Proposal for a conceptual development at 17-20 & 23- 24 Loftus Crescent, Homebush. Noting the subject Planning Proposal only relates to 17-20 Loftus Crescent, Homebush.

Based on the changes sought to the Strathfield Local Environmental Plan 2012, the development potential of the site could be for a building containing a building containing 80 apartments and 700m<sup>2</sup> gross floor area of commercial space.

The car parking requirements for the proposed yield has been assessed to be 93 parking spaces for No. 17-20. This is based on residential parking rates published under the RMS Guide to Traffic Generating Developments, which provides a lesser requirement to the Strathfield Council Development Control Plan and can thus be adopted in accordance with the Apartment Design Guide and State Environmental Planning Policy No. 65.

In terms of the overall network performance arising from the Planning Proposal itself, as required under RMS Guidelines, two scenarios have been considered as follows:

- Existing Model – All intersections operate well with acceptable delays and spare capacity.
- Existing + Development Model – The additional generated traffic for the assessed development scheme will operate similarly to the existing situation during both weekday peak periods.

As the concept development is of a substantially lower scale. It is expected that future development will have minimal impact on the operation of the surrounding network near the site, as such no external improvements are considered to be required to support the development at this Planning Proposal stage.



## Built character

The proposed amendments to building height and floor space ratio controls are informed by a detailed urban design study. The urban design study provides analysis of the site and its context as well as potential design options for future redevelopment.

The urban fabric of Homebush is experiencing a period of transition and the potential design options for the future redevelopment of the subject site as illustrated in the urban design study reflects this change. Several projects are taking place which are shaping the scale and context of development in areas around the subject site.

The urban design study tests various height and density scenarios. The preferred outcome for this site is a floor space ratio of 3.6:1 with a building height of 75m. The reasons for this option being preferred are:

- Having a strong built form character along Loftus Crescent and Subway Lane will result in a better urban design outcome.
- The height and density sit within a hierarchy of centres, relative to Parramatta CBD and Sydney CBD.
- The proposed 75m height limit is consistent with the Parramatta Road Corridor Urban Transformation Strategy recommended controls for adjacent development.
- The site location within 200m of Homebush train station presents an ideal opportunity for high density transport orientated development.

The Planning Proposal demonstrates that potential development of the subject site is consistent with the scale of urban renewal envisioned by the Eastern City District Plan and the Parramatta Road Corridor Urban Transformation Strategy. A floor space ratio and building height control that is consistent with other adjoining site will lead to development that is aligned with the changing context of Homebush without any unreasonable impact on the amenity of surrounding land. This Planning Proposal seeks to rectify an anomaly presented in the Parramatta Road Corridor Urban Transformation Strategy. Moreover, future development will be complemented by a substantial public open space and preservation of heritage in the heart of Homebush.

The urban design study demonstrates the benefits of relieving pressure on the ground floor and placing the density on upper levels of the building. This allows more space to contribute to the enhancement of the pedestrian and access movements patterns.

## Overshadow study

An overshadow impact assessment has been undertaken and is submitted for consideration with this Planning Proposal, this is included in the urban design study. The proposed concept plan has been analysed with the proposed maximum building height limit to 75m.

In summary and conclusion, the shadow analysis of the proposed concept plans reveals the potential to cause significant or unacceptable further shadow is limited.

### **The existing uses, approved uses and likely future uses of land in the vicinity of the land subject to a proposal?**

Yes. The Planning Proposal does not seek to change the permitted uses on this site. The Planning Proposal seeks to amend the controls relating to building height and floor space ratio which will permit a better strategic outcome for this ideally located land. The proposed density responds to more recent policies of the Greater Sydney Commission and the NSW Department of Planning and Environment where high density development is to be delivered in existing urban centres.

### **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?**

Yes. The site located within the existing Homebush centre and is therefore ideally positioned to act as a focus for significant urban transformation. The area is well serviced by schools, tertiary institutions, child care centres, community services, recreational and sporting facilities and an established commercial centre. Furthermore, the locality has excellent connectivity with access to several key arterial road networks including the Great Western Highway and the M4 Motorway as well as regular public transport services.

The proposed amendments are driven by a desire to deliver a superior urban design outcome for the site, ensure the maximum building height control and maximum floor space ratio control are aligned to facilitate development that is consistent with the desired future character of Homebush. The proposed amendments to planning controls will facilitate the delivery of catalytic development contributing to much needed housing supply and public domain improvements at the street within this strategic corridor.

Although Strathfield Council does not currently have a formal Public Benefit Policy the land owner is keen to commence discussions with Council about entering into a Voluntary Planning Agreement which can also include contribution to affordable housing on the site. The specific details of this agreement can be formalised during the Gateway process for this Planning Proposal.