

29 March 2018

Think Planners
PO Box 121
WAHROONGA NSW 2076
Attention: Adam Byrnes

Dear Adam,

Re: Nos 17 – 20 Loftus Crescent, Homebush – Planning Proposal

Reference is made to the Planning Proposal submitted on 14 March 2018 for Nos 17-20 Loftus Crescent, Homebush seeking consideration of the following amendments to Strathfield LEP 2012:

- Amending Clause 4.3 Height of Buildings and Clause 4.3A Exceptions to height of buildings (Parramatta Road Corridor) from 0m (17 Loftus Crescent), 16m (20 Loftus Crescent) and 20m (18 & 19 Loftus Crescent) to 75m; and
- Amending Clause 4.4A Exceptions to Floor Space Ratio (Parramatta Road Corridor) from 2.25:1 (20 Loftus Crescent) and 2:7:1 (17, 18 & 19 Loftus Crescent) to 7:1

Council has undertaken a preliminary assessment of the Planning Proposal application and considers that the Planning Proposal is inconsistent with the Strategic Vision for the Parramatta Road Corridor and Part 7.3 of the Section 117 Ministerial Directions under the Environmental Planning & Assessment Act 1979, in that:

- The proposal does not facilitate development within the Parramatta Road Corridor that is consistent with the *Parramatta Road Corridor Urban Transformation Strategy* (November 2016) and the *Parramatta Road Corridor Implementation Tool Kit*.
- The proposal fails to provide a diversity of jobs to meet the needs of a broad cross section of the community.
- The justification for the non-compliant maximum FSR is considered inadequate.

Adequate justification has not been provided in the documentation to justify inconsistencies with the *Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) 2016*. The justification that an FSR of 7:1 (the Urban Design Study prepared by Aleksandar Design Group identifies 6.79:1) is required to maximise the height of 75m is not considered to be adequate justification.

Further analysis should be submitted indicating options which include a compliant proposal. It is noted that the Urban Design Study does indicate a proposal that is compliant with FSR, however an option should also be considered that limits the podium.

In addition, further assessment of the following is required:

- It appears from the documentation submitted with the Planning Proposal that no Traffic, Transport or Parking Assessment has been prepared or submitted. Can you please confirm if this is correct?
- A Traffic, Transport and Parking Assessment is to be submitted. This is to include a more detailed precinct wide transport network assessment to confirm the extent and density of urban development. This is consistent with the recommendations of the Sydney Eastern City Planning Panel in the assessment of the Planning Proposal for No 11-17 Columbia Lane, Homebush. The Planning Panel has deferred consideration of this Planning Proposal until the outcome of the precinct wide traffic study is known. It is anticipated that the precinct wide study will be completed by mid-2018. The potential traffic impact of any additional uplift proposed above and beyond the PRUTS would need to also be assessed as part of the precinct wide transport network assessment.
- Any Traffic, Transport and Parking Assessment should also address the following:
 - i. Consideration of existing constraints within the Precinct including existing high traffic volumes on the strategic road network
 - ii. Details of how proposed vehicular movements entering and existing the site will impact on the “High Pedestrian Activity Zone” along Powell Street, movement and circulation around the Westconnex Portal, and the delivery of new open space under the M4 Motorway
 - iii. A review of the proposed on-site car parking provision in the context of reducing car dependency and encouraging active transport linkages and greater pedestrian connectivity throughout the Precinct.
- The Urban Design Report (March 2018) prepared by Aleksandar Design Group should be amended to address the following:
 - i. Details of pending Planning Proposals on land in the vicinity of the site and associated implications
 - ii. The timing and availability of infrastructure delivery to meet the cumulative needs of future population growth envisaged for the Precinct
 - iii. Details of links to open space and community facilities to support the population growth envisaged under the Strategy
 - iv. Implications of existing constraints within the Precinct, including low pedestrian connectivity and active transport linkages to public transport, open space, recreational opportunities and employment, movement and circulation around the Westconnex Portal, delivery of new open space under the M4 Motorway, and fragmented communities within the Precinct.
 - v. Implications of the proposed built form siting and layout on the development potential of surrounding sites, having regard to the requirements of the Apartment Design Guide (ADG) including, but not limited to building separation, solar access, visual and acoustic privacy, deep soil zones, communal and public open space, cross ventilation and private open space.

- vi. The provision of affordable housing shall align with the PRCUTS and the Eastern City District Plan. Details relating to the provision of Affordable Housing are to be included with the Planning Proposal.

In addition, the proposed rezoning is seeking a significant uplift in the FSR on the site (from 3.6:1 to 7:1), resulting in a significant uplift in the value of the land. The applicant has had no discussions with Council around the provision of community benefit and the negotiation of a VPA.

Prior to any further assessment, Council requests that the issues outlined in this letter are addressed within 28 days of the date of this letter (27 April 2018).

Once this information is submitted, Council will undertake a detailed review of the Planning Proposal and documentation submitted in accordance with the requirements of the *Environmental Planning & Assessment Act 1979* and any relevant policy documents prepared by the NSW Department of Planning & Environment and prepare a report to the Strathfield Local Planning Panel/Council.

Please do not hesitate to contact Council's Principal Strategic Planner, Ms Rita Vella on 9748 9995 should you wish to discuss this matter or require any additional information.

Yours faithfully



Stephen Clements

DIRECTOR INFRASTRUCTURE, DEVELOPMENT AND ENVIRONMENT