

4 April 2018

Hon Anthony Roberts
Minister for Planning
GPO Box 5341
SYDNEY NSW 2001

Via email lanecove@parliament.nsw.gov.au

CC: andrew.watkins@planning.nsw.gov.au, wayne.williamson@planning.nsw.gov.au

RE: Planning Proposal 86-88 Centenary Drive Stratfield.

Dear Minister,

Please find attached a Pre-Gateway Rezoning Review request for the Planning Proposal submitted to amend the height and FSR controls applying under the Strathfield Local Environmental Plan 2012 to 86-88 Centenary Drive, Strathfield.

Introduction

The Planning Proposal that is the subject of this Review Request seeks uplift in FSR from 1.2:1 to 1.8:1 and in height from 28m to 65m. Located adjacent to Strathfield Golf Course, the site is clearly capable of accommodating additional height and density beyond the current controls, without significantly compromising solar access, neighbouring amenity or the functionality of nearby roads.

The site is well connected, on Centenary Drive, a major arterial road in the Sydney road network, and is within 200m of a regularly serviced bus stop on Liverpool Road linking the site to nearby centres at Strathfield, Burwood and Homebush, and onto Sydney's second CBD at Parramatta. The site is also adjacent to the Cooks River Cycleway, linking the site to nearby economic centres and primary, secondary and tertiary educational facilities.

The applicant has endeavoured to work with Strathfield Council Officers, however, discussions to date have been unproductive. Given that the townhouse component of the development (stage 1) is nearing completion, we feel that it is in the public interest to progress this planning proposal and have it reviewed by the Department of Planning. We have met with Council on numerous occasions to discuss this Planning



Proposal, including in a pre-lodgement capacity. Whilst positive advice was given initially at our most recent meeting, contradictory advice was provided weeks later in writing.



Figure 1 Aerial photograph identifying the Site and nearby services, open space and distance to regional centres.

Attachments

To assist with the review of our Planning Proposal, please find attached the following documents:

- Planning Proposal Application form submitted to Strathfield Council (dated 19/12/2017).
- Planning Proposal Report prepared by SMEC including:
 - Attachment A: Design Report prepared by Woods Bagot,
 - Attachment B: Traffic Assessment prepared by Transport and Traffic Planning Associates,
 - Attachment C: Indicative Acoustic Report prepared by Wood and Grieve Engineers
- Separate zip file containing relevant correspondence with Council since lodgement of the Planning Proposal. Note, only written correspondence has been via email from Council's consultant, Philippa Frecklington (Sydney Planning).
- Council's email correspondence indicating the Planning Proposal would not be supported.
- Additional information submitted to Council 3 April 2018.

Strategic Merit Test

We understand that the Department of Planning and Environment has strengthened the Strategic Merit Test and that rezoning review proposals must be assessed to determine if they are:

- (a) Consistent with the relevant District Plan, or corridor/precinct plans applying to the site including any draft regional, district or corridor/precinct plans released for public comments, or
- (b) Consistent with a relevant local strategy that has been endorsed by the Department, or
- (c) 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.

With regard to the Strategic Merit Test, we believe our proposal is entirely consistent with the objectives and actions of the *Greater Sydney Region Plan 2056* and the priorities of the Eastern City District Plan, thus demonstrating consistency with (a) above.

We also understand that a proposal that seeks to amend controls that are less than 5 years old will only be considered where it clearly meets the Strategic Merit Test. We believe our Planning Proposal has strong strategic merit and demonstrates the economic use of infill land within an established and well connected residential area, consistent with the directions, objectives and priorities of the *Greater Sydney Region Plan 2056*.

The current controls (approved under Strathfield Local Environmental Plan 2012, Amendment No 5, 5 December 2014) do not maximise the opportunities for infill development on this relatively unconstrained site, and we believe there to be good strategic merit for their review. This proposal presents a rare greenfield opportunity, within an infill context, that can readily accommodate significant additional density, height and scale at a gateway location within easy reach of commuter hubs at Strathfield and Burwood, with onward connections to Sydney CBDs.

Section 4.5 and Section 7 of our Planning Proposal provides detail of the Strategic Planning Context applicable to the site at the time of lodgement. The assessment includes consideration of the now repealed *A Plan for Growing Sydney*, and the previously draft *Greater Sydney Region Plan 2056* and *Sydney Eastern City District Plan*. As you are aware, the Greater Sydney Commission released the final Greater Sydney Region Plan and accompanying District plans on 18 March 2018 and these now form the primary strategic context for the proposal. The following discussion is based on these now finalised policies.

The *Greater Sydney Region Plan 2056* is a reconceptualisation of Greater Sydney as a metropolis of three cities: Sydney CBD, Parramatta CBD and the Western Sydney Aerotropolis. A primary vision of the Plan is to create a '30-minute city', whereby the majority of residents are able to commute to their nearest city within 30-minutes.

The Site at 86-88 Centenary Drive is strategically located to provide additional residential density and a vibrant mixed-use community within a 30-minute commute to the Greater Parramatta CBD and the Harbour CBD. The Site is located alongside a major arterial road (Centenary Drive), providing access to the established network of Sydney motorways. The Site is also within walking distance of Liverpool Road (Hume Highway) with bus stops regularly serviced by high capacity and high-frequency bus services which provide onward connection to the Metropolitan Transport Network including local railway stations at Strathfield (11min

journey) and Burwood (20min journey). Express train services from both Strathfield and Burwood Railway Stations provide access to major CBD employment hubs in Parramatta and Sydney CBD within a 30-minute commute.

As demonstrated in Figure 2, the Site is strategically located almost equidistant from Sydney CBD and Parramatta CBD, within very close proximity of the Burwood and Sydney Olympic Park strategic centres. The Site is well connected to existing residential development, local services, schools and neighbourhood shops, existing transport and established infrastructure. This Site presents a unique opportunity for infill development, in a greenfield setting, being located adjacent to a golf course. The proposed amendments have been tested to ensure there is not an unreasonable overshadowing or overlooking impact on the adjoining high school playing field or low-density development further east. The lack of environmental impact resulting from the proposed amendments is demonstrative that the site is capable of accommodating additional density beyond the current LEP height and FSR controls.

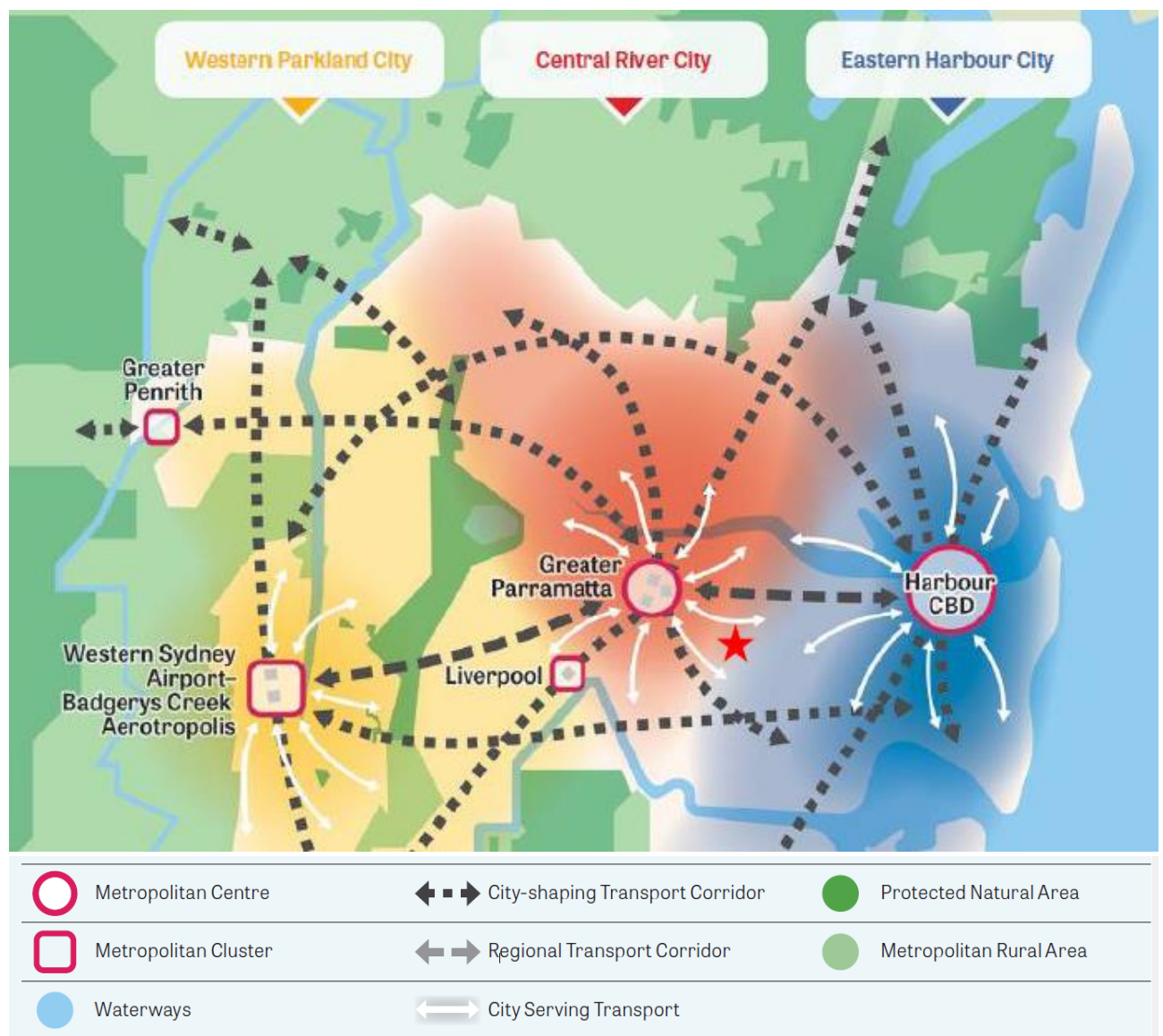


Figure 1 The Greater Sydney Region Plan 2056 envisages a global metropolis of three cities. Approximate location of the site identified by a red star.

The *Greater Sydney Region Plan 2056* contains ten directions which are supported by a series of objectives that are then prioritised within the *Eastern City District Plan*. This Planning Proposal demonstrates consistency with the directions, objectives and priorities of these strategic documents as follows:

- *Direction: A city supported by infrastructure*
 - Objective 4: Infrastructure use is optimised
 - Planning Priority E1: Planning for a city supported by infrastructure

This proposal would permit additional density in an infill context, where existing road and public transport infrastructure can be utilised.

The Site is well serviced by existing high capacity and high-frequency bus services which provide onward connection to the Metropolitan Transport Network including local railway stations at Strathfield (11min journey) and Burwood (20min journey). Express train services from both Strathfield and Burwood Railway Stations provide access to major CBD employment hubs in Parramatta and Sydney CBD within a 30-minute commute.

- *Direction: A city for people*
 - Objective 6: Services and infrastructure meet communities changing needs
 - Objective 7: Communities are healthy, resilient and socially connected
 - Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities

The additional density can be serviced by existing health and educational establishments within the local area. The adjoining school has had declining enrolments in recent years (Strathfield South High School Annual Report 2017), whilst existing health and community services are accessible in nearby centres at Strathfield (4km), Burwood (5km), Bankstown (9km) and Concord (8km).

The development will also provide opportunities for casual social interaction between residents and will provide housing that is designed to assist ageing in place. Proposed shared facilities within the site will include swimming pool, gym, multi-court, playground, shared bicycle paths and a shuttle operating in peak periods for access to/from local railway stations.

- *Direction: Housing the city*
 - Objective 10: Greater housing supply
 - Objective 11: Housing is more diverse and affordable
 - Planning Priority E5: Providing housing supply, choice and affordability with access to jobs, services and public transport

The Site will deliver a variety of housing styles across the site to meet the needs of various households at all life stages. Housing is linked to existing local infrastructure to create livable neighbourhoods. This Site is appropriate for significant additional density due to access to shops, services and public transport, and can contribute to the housing targets identified in the District Plan.

The proposal includes the option to designate a portion of units to Council as affordable housing (subject to a VPA). *NB Strathfield Council does not have an Affordable Housing Policy, however, the applicant would be open to discussions with the Relevant Planning Authority.

- *Direction: A city of great places*
 - Objective 12: Great places that bring people together

- Planning Priority E6: Creating and renewing great places and local centres, and respecting the District's heritage

The Site is located within walking or cycling distance of numerous local town centres and established parks, cycleways and golf courses. Additional density can be supported on this undeveloped and relatively unconstrained site to ensure character and heritage of existing places can be preserved.

- *A well-connected city*

- Objective 14: A metropolis of three cities – integrated land use and transport creates walkable and 30-minute cities.
- Planning Priority E10: Delivering integrated land use and transport planning and a 30-minute city

The proposal would deliver additional dwellings within a 30-minute commute of Burwood strategic centre, Parramatta and Central Sydney CBDs (via bus/cycle to nearby stations and express train). The Site is very well connected to a variety of land uses including business and employment zones, community facilities in Strathfield, a local shopping centre in Chullora (1km), designated bicycle and pedestrian routes, schools and public transport.

Whilst this Planning Proposal seeks a substantial uplift in FSR from 1.2:1 to 1.8:1 and height from 28m to 65m, the site is clearly capable of accommodating additional residential density without significantly compromising solar access, neighbouring amenity or the functionality of nearby roads.

There are few sites in the Inner West of Sydney with characteristics that can accommodate buildings of the height, bulk and scale proposed in this Planning Proposal. The site's location, adjacent to the Strathfield Golf Course, allows the scale and height of the buildings to be absorbed in the landscape. The golf course provides all units with views over the established trees to Homebush and the City, enhancing residential amenity with a green, natural outlook and excellent solar access. The concept design responds to the site constraints to ensure there is minimal overshadowing and overlooking toward the adjoining high school and low-density development.

We trust that this letter and attached documents are sufficient to allow this Pre-Gateway Rezoning Review to be considered by the Department of Planning. Should you wish to discuss any aspect of this request a Pre-Gateway rezoning review further, please do not hesitate to contact the undersigned on +61 6234 1976 or +61 403 429 249, or via email sophie.olsen@smec.com

Yours sincerely,



Sophie Olsen
Senior Town Planner