

3 April 2018

Stephen Clements  
Director Infrastructure, Development and Environment  
Strathfield Council  
Via email: [stephen.clements@strathfield.nsw.gov.au](mailto:stephen.clements@strathfield.nsw.gov.au)  
CC: Philippa Frecklington [sydneyplanning@hotmail.com](mailto:sydneyplanning@hotmail.com)

RE: Additional Information Request: Planning Proposal 86-88 Centenary Drive Stratfield.

Dear Stephen,

Please find attached our response to the additional information as requested via email on 2 March 2018. For ease of response, we have adopted the topic items from your assessment notes.

### 1. Height and Density

Council Officers raised concern regarding the integration of the heights and density of the Planning Proposal with the surrounding locality.

The report accompanying our Planning Proposal contains considerable discussion of the locality and the context of the Site. The Site is unique as it is located adjacent to a golf course and high school. There are limited height queues within the surrounding catchment, providing an opportunity for a landmark building which denotes the gateway location of the Site. In fact, the existing height control (28m) applicable to the Site under the Strathfield Local Environmental Plan 2012 (SLEP) permits a building of considerably greater height when compared to the building heights permitted on nearby Sites. This clearly designates the subject Site for a landmark building defining a change in the urban grain, typology of use and the key intersection of Centenary Drive and Liverpool Road.

Referring to the height sought by the Planning Proposal as a '132% variation to the existing height control' is incorrect. The purpose of the Planning Proposal is to *amend* the existing development standards, and as such, should not be subject to such comparisons to the existing controls.

For further information, please refer to Section 8.2.1 Built Form Context and Urban Hierarchy of our Planning Proposal. Additionally, Section 4 of the Design Report prepared by Woods Bagot also provides a detailed visual assessment of the surrounding urban form and typologies.



## **2. Strategic Planning Context**

The report accompanying our Planning Proposal provides a detailed analysis of the Strategic Planning context of the proposal in accordance with the Department of Planning and Environment *A Guide to Preparing Planning Proposals* (2016).

Council Officers raise concern that the Site is not located within a transit orientated corridor and is not identified as a priority precinct. Notwithstanding this, a Planning Proposal can be submitted and considered on its merits. We opine that the Site presents a good strategic location for additional residential density, meeting the objective of the '30 minute city' with excellent connectivity to existing bus routes and the provision of a private shuttle bus for residents linking to nearby Strathfield Railway Station.

For additional information, please refer to Section 6 and 7 of our Planning Proposal report and the below discussion of connectivity.

## **3. Vision**

Council Officers raise concern regarding linkages and integration to the local context. The existing land zoning presents an isolated portion of B4 Mixed Use zoned land. The vision for the Site in the Planning Proposal incorporates additional density to support ground-floor commercial uses, in accordance with the existing zoning. The additional density will provide the 'critical mass' to support local businesses which we envisage would like to co-locate on the Site, and nearby business zoned land within walking distance of the Site.

The developer of Stage 1 (townhouses) has negotiated a pedestrian linkage (easement) through the adjoining school linking to Hedges Avenue. All residents of the Site would be beneficiaries of this walkway easement. This will provide additional pedestrian connectivity to local services at Caves Road, the Cooks River Cycleway, local parks and community services.

Notwithstanding this private easement agreement, we would like to draw Council's attention to discussions in the initial Planning Proposal for the rezoning of the Site where Councillors promised local residents that there would be no connectivity (pedestrian or otherwise) to Hedges Avenue.

The Site is also located within walking distance (350m) of B6 Business Enterprise zoned land along the southern side of Liverpool Road, connected via existing footpaths and signalised crossings. This area contains a variety of takeaway premises, gymnasiums, restaurants and other businesses, with zoning provisions to support a variety of local services as needs and demands change in the local area. Additionally, land zoned B2 Local Centre (549-559 Liverpool Road) is within an 800m pedestrian catchment from the Site and land zoned B1 Local Neighbourhood (1-17 Hume Highway, Chullora) is within a 400m walk.

The Site is located in an area undergoing transition. We agree that it is important to ensure that future residents are provided with good access to local services, be these within the mixed-use Site or within the local area. The variety of land zonings within the walking catchment of the Site (i.e. 800m) will support

future local services and shops for future residents, aligning with the Greater Sydney District Plan and vision for a well connected 30-minute city.

#### **4. Public Benefit**

A discussion of social and economic benefit arising from the Planning Proposal is provided in Section 8.3 of the submitted report. At this early stage, Community Consultation is not required to be undertaken, however, should the Planning Proposal proceed we would welcome the opportunity to assist Council in undertaking the consultation requirements that would be determined in a future Gateway Approval.

#### **5. Traffic Impacts and Active Transport Linkages**

The comments provided raise concern regarding the 'validity' of the traffic report, however, do not provide any specific technical direction as to the matters that Council or the relevant roads authority (Roads and Maritime Services) would like addressed.

The format adopted by the Traffic Impact Assessment follows the guidelines prepared in the RMS Guide to Traffic Generating Developments and the assessment requirements of the SEPP (Infrastructure) 2007. These requirements do not require a 'cumulative' assessment, and instead, assess generation of traffic movements. The adopted traffic generation rate for the proposal is very similar to that assessed by Council and RMS for the previous Planning Proposal and Development Application.

We would welcome the opportunity to discuss Council's technical concerns relating to the Traffic Impact Assessment with the relevant Traffic Engineer, and RMS representatives.

#### **6. Constraints**

We opine that the 'constraints' raised in Council's assessment notes are actually strengths of the Site. The Site has very convenient and direct access to the arterial road system, without reliance on travel along the local road system. This is an important feature of the Site and allows the additional density to be supported without impacting the residential street network and channelling vehicular movements through low-density roads. These surrounding arterial roads are provided with footpaths and signalised crossings, assisting with the movement of pedestrians in the local area. Additionally, a pedestrian overpass provides a link from the northern to the southern side of Liverpool Road, directly accessing the B6 Business Enterprise zoned land previously discussed.

The Site has very convenient access to high capacity/ high-frequency bus services which provide connection to the Metropolitan Transport Network including local railway stations. A review of bus services provided along Liverpool Road, with stops within 800m walking distance of the Site, is provided in Section 3.4 of the Traffic Impact Assessment. These services operate regularly (every 10min in peak) and provide excellent '30 minute' connectivity to Strathfield Railway Station (11min journey) and Burwood Town Centre (20min journey).

The Site has convenient pedestrian/cyclist connections:

- along Centenary Drive, with designated footpath and cycling lanes
- along Liverpool Road including a pedestrian bridge crossing
- along the Bay to Bay shared path route, via Liverpool Road footpath/cycle lane
- to nearby schools including the neighbouring Strathfield South High School, St Patrick's College, and Strathfield Primary, as well as Australian Catholic University, SDA College and Malek Fahd Islamic College

- Chullora Market Place Shopping Centre, with Woolworths, Aldi and Big W anchor tenants, is only approximately 1km to the south
- nearby business zonings which will support a variety of future uses (400m to 800m walking distance)
- to Caves Road local shops via public roads (800m walking distance) or via private easement (approx. 500m)
- to nearby industries and the Chullora Business Park providing convenient employment opportunities within walking distance.
- high-frequency regular bus connections to local centres at Strathfield, Burwood and Bankstown, meeting the 30-minute city objectives of the Greater Sydney Regional Plan.

## **7. Retail Strategy**

The Planning Proposal has been prepared in accordance with the requirements of Section 55 of the Environmental Planning and Assessment Act 1979, 'A Guide to Preparing Planning Proposals' (NSW DPE 2016) and the relevant Section 117 Ministerial Directions.

Section 1.3 of 'A Guide to Preparing Planning Proposals' states that '*A Planning Proposal which is submitted for a Gateway determination must provide enough information to determine whether there is merit in the proposed amendment proceeding to the next stage of the plan making process. The level of detail required in a Planning Proposal should be proportionate to the complexity of the proposed amendment.*' The subject Planning Proposal seeks to amend the height and Floor Space Ratio development standards applicable to the Site, however, seeks to retain the current B4 Mixed Use zoning. As stated previously, the additional density will provide critical mass to support land uses in accordance with the existing B4 zoning.

As this zoning is existing and is not to be modified under the subject application, we question whether a retail strategy would be required for changes to bulk, height and scale, as the delivery of a mixed-use precinct is already inferred by the current zoning.

## **8. Land Use Mix**

As stated above, the Planning Proposal does not seek to modify the land zoning of the Site and as such, the 'mixture' of uses is therefore not relevant to this amendment to the Strathfield LEP 2012. In any event, we opine that increasing the residential density of development on the Site would help to support a range of ground floor commercial tenancies within the Site and in local business zonings/neighbourhood shops.

The size and configuration of commercial tenancies would be subject to further review in a future Development Application. The Design Report and concept plans are indicative only at the Planning Proposal stage.

## **9. Through Site Linkages**

Please refer to previous discussions above regarding the private easement to Hedges Avenue and local connectivity via signalised crossings, pedestrian footpaths, cycle lanes and bridge overpass.

## **10. SEPP 65**

The design provided with the Planning Proposal is indicative and intends to demonstrate to Council what would be achieved in a future Development Application, based on the amended controls.

The summary table on page 4 of the Woods Bagot Design Report provides a brief SEPP 65 Analysis demonstrating that 77% of units would achieve at least three hours solar access at midwinter and 61.5% of units would be naturally cross ventilated (to level 9). Further information and detailed SEPP 65 Assessment would be provided in a future Development Application, however, is not ordinarily requested during the consideration of concept Planning Proposal plans.

#### **11. Design Quality**

As discussed at our meeting of 1 March 2018, the townhouse component of the development has been completed by a different consultant team, architect and developer and is not connected with the current owner of the Site. To hypothesise that this would impact on the delivery of a quality development in Stage 2 of the Site is unsubstantiated and unfair to the current owner of the Site and capabilities of the consultant team.

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 Greater Sydney District Plan.

Should you wish to discuss any aspect of this letter 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](mailto:sophie.olsen@smec.com)

Yours sincerely,



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