

29 April 2018

Ms Amanda Harvey  
Director, Sydney Region East  
NSW Department of Planning & Environment  
320 Pitt Street,  
SYDNEY NSW 2000

**Attention: Kris Walsh**

Dear Ms Harvey,

**REZONING REVIEW: PLANNING PROPOSAL FOR 28 TO 34 VICTORIA STREET & 23 TO 27 GEORGE STREET, BURWOOD**

City Plan Strategy & Development (CPSD) acts on behalf of VSD Investments, the proponent of the abovementioned Planning Proposal which was submitted to Burwood Council in 2017.

This correspondence responds to the NSW Department of Planning & Environment's (DPE) email request for additional information dated 13 April 2018. Specifically, this correspondence responds to the last item of the request which seeks an itemised response to the strategic and site specific merit test outlined in the *Guide to Preparing Planning Proposals* (August 2016).

We note that the Planning Proposal report prepared by CPSD, which accompanied the Rezoning Review request, addressed these tests in **Section 6.2**. We have now taken the opportunity to update this assessment to reflect the final release of the various metropolitan and district-based plans that were in draft format when the Planning Proposal report was initially prepared and submitted to Burwood Council.

**1. STRATEGIC MERIT TEST**

**Is the proposal 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?**

**1.1 Eastern City District Plan**

The subject site is within the Burwood Local Government Area (LGA), which forms part of the Eastern City District. As can be seen by the extract of the Eastern City District Plan on the following page, Burwood is nominated as a Strategic Centre, forms part of an Urban Renewal Area, and is serviced by a City Serving Transport Corridor as well as an existing heavy rail station.

The proposal's consistency with the relevant priorities of the Eastern City District Plan is demonstrated in **Appendix 1**.

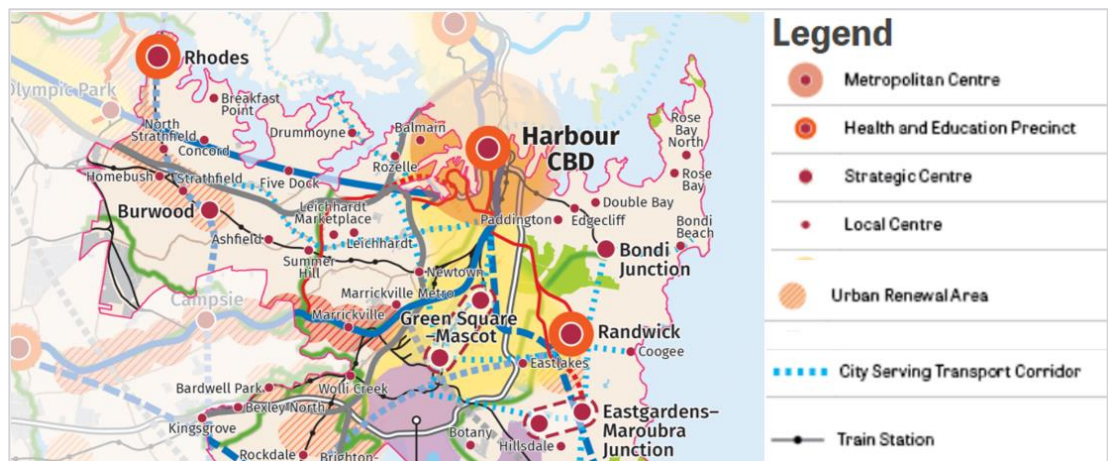


Figure 1: Eastern City District Plan (Extract)

### 1.2 Burwood Strathfield Homebush Planned Precinct

On June 2017, DPE announced that land generally within an 800m radius of Burwood, Strathfield and Homebush railway stations would form part of a Planned Precinct. The overriding purpose of this Planned Precinct is to encourage revitalisation of established suburban centres, as well as encouraging more dwellings to help put downward pressure on house prices (Source: <http://www.planning.nsw.gov.au/Plans-for-your-area/Priority-Growth-Areas-and-Precincts/Burwood-Strathfield-and-Homebush-Planned-Precinct>).

DPE has publicly exhibited and sought feedback on the plan, including undertaking one (1) information session on 24 June 2017. It is understood that DPE is considering the public feedback received to date, as well as refining the boundaries of the precincts.



Figure 2: Exhibited Planned Precinct boundaries (with subject site outlined in yellow) (Source: <http://www.planning.nsw.gov.au/News/2017/~media/9A92B4D6E6234F39A0FD664BC6653C8E.ashx>)

The Planning Proposal provides the impetus to amalgamate four (4) adjoining allotments, with a total site area of approximately 5,500m<sup>2</sup>. As indicated in the concept plans prepared by Architectus, the amalgamated site has scope to deliver a sizeable mixed-use outcome with commercial and residential land uses, publicly accessible open space, and a through-site pedestrian link.

The proposal will assist with revitalising the Burwood Town Centre because of its sheer size. In addition, it is likely to be a catalyst for further renewal on other adjoining or nearby allotments. It has the potential to deliver approximately 10,000m<sup>2</sup> commercial GFA, and 35,000m<sup>2</sup> residential GFA. Indicative floor plans, designed to demonstrate compliance with SEPP 65 and the ADG, suggest a total of approximately 400 dwellings could be delivered within this GFA, with a mix of 1, 2 and 3-bedroom dwellings. This number and diversity of dwellings will assist with current high demand for new dwellings in Sydney, thereby meeting one of the planned precinct's primary objectives. The proposal's potential to deliver a sizeable quantity of commercial GFA, in large floor plates, will assist with meeting another of the precinct's primary objective.

### 1.3 Future Transport Strategy 2056

In 2018, the NSW Government released the *Future Transport Strategy 2056*. The strategy sets the direction for transport in NSW for the next 40 years. It has been developed to support the *Greater Sydney Region Plan - A Metropolis of Three Cities*, where people have access to jobs and services within 30 minutes by public transport.

The strategy currently recognises Burwood as a strategic centre. Similarly, it recognises existing and currently committed infrastructure for the purposes of meeting transport demands in and around Burwood. Such infrastructure includes the existing heavy rail, existing bus services, the M2, Parramatta Road, as well as additional road based private and public transport capacity to be provided as part of WestConnex.

The plan also references several long term public transport related initiatives which would serve Burwood and its surrounds, as is described below. It is recognised that not all such initiatives are currently committed, but they are nevertheless worthy of consideration.

A new 'city serving corridor' is proposed between Burwood and the Sydney CBD (page 95). Page 94 of the strategy suggests the mode for such corridors includes either bus, ferry, light rail, train, walking and cycling.

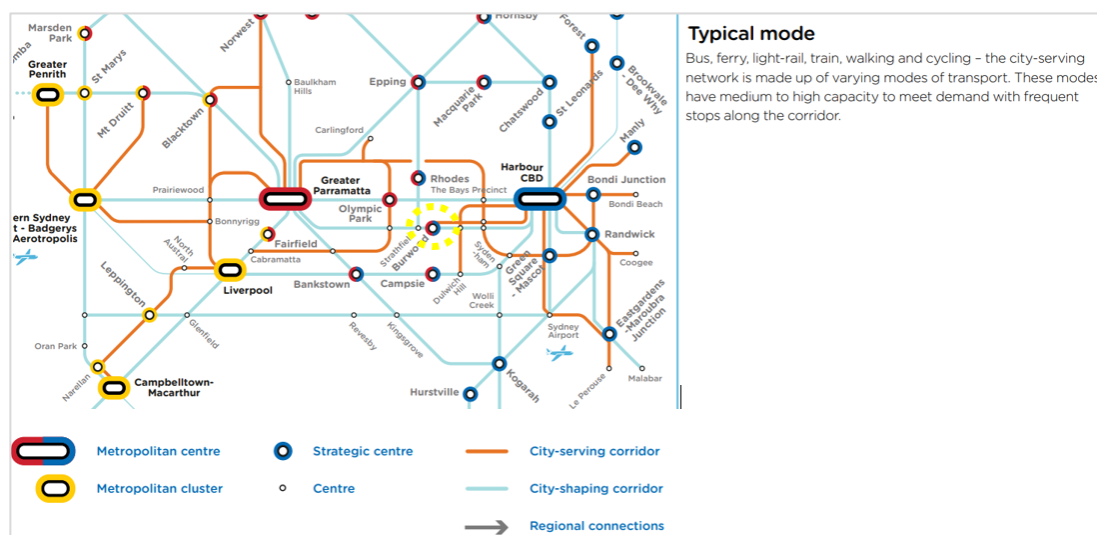


Figure 3: Long term public transport network highlighting additional measures to serve Burwood and surrounds (Source: Future Transport Strategy 2056, page 95)

Other long term public transport initiatives serving Burwood include upgrades to existing rail capacity, as well as a new western Sydney heavy rail line (page 121 - 122). These are referenced in the Future Transport Strategy 2056, and form part of the Western Sydney City Deal. The T1 line, which extends from the Sydney CBD, to Parramatta (stopping at Burwood) and then to Penrith, is expected to have capacity increased (page 121 - 122). A new heavy



rail line is also proposed from the existing Parramatta heavy rail station to the committed second Sydney Airport in Badgerys Creek. This will provide convenient public transport connectivity from Burwood to the second Sydney Airport.



Figure 4: Long term heavy rail network upgrade plan highlighting additional capacity in and around Burwood (Source: Future Transport Strategy 2056, page 121)

### Is the proposal consistent with relevant local council strategy that has been endorsed by the Department?

There are no known local strategic plans which have been prepared for the Burwood LGA and endorsed by the Secretary of Planning and Environment.

#### 1.4 Burwood Community Strategic Plan

The Burwood Community Strategic Plan *Burwood 2030* has not been endorsed by the Secretary. However, it is Burwood Council's 20-year plan providing a blueprint and clear directions for the future of Burwood.

The PP's consistency with this Community Strategic Plan is demonstrated in the Table 1.

Table 1: Consistency with Burwood 2030

Theme	Strategic Goal	Comment
A sense of community	1.1 A safe community for residents, workers and visitors	<p>The PP is capable of improving the pedestrian accessibility and connectivity within the town centre, by providing a direct pedestrian thoroughfare, with a clear line of sight, from Victoria Street to George Street.</p> <p>Additional traffic management enhancements proposed as part of the public benefit offer will further assist in providing a safe community.</p>
	1.5 A sense of community pride	The PP encourages the redevelopment of an amalgamated site, which currently comprises ageing residential buildings. This will ultimately improve the quality and amenity, providing generous public communal open spaces and meeting places to build a new sense of community.
A sustainable natural environment	3.1 Maintain and enhance open green spaces and streetscapes	The PP encourages the redevelopment of an amalgamated site, which is proposed to include significant open space and landscaping to create improved streetscape and public domain areas.
	3.3 Educate the community on sustainable practices	Future buildings are capable of incorporating latest ecological sustainable design principles to support sustainable living.
Accessible services and facilities	4.1 Effective traffic management and adequate parking provision	<p>Traffic management enhancements proposed as part of the public benefit offer will assist in meeting this goal.</p> <p>In addition, any future development will be designed to comply with the appropriate parking requirements.</p>
	4.4 Encourage active and healthy lives	The location of the site in close proximity to the rail and bus networks provides the opportunity to create a transit-oriented development, reducing the reliance on private cars and increasing pedestrian activity and active transport.
	4.5 Vibrant and clean streetscape	The proposal is capable of improving the amenity of the centre, by provide a high quality built form, with increased and improved open space areas and streetscapes.
A vibrant economic community	5.1 Support and manage Burwood's major centre status	The PP is capable of reinforcing this status by providing a high-density, mixed used development in a strategic location.
	5.2 Support small business	The PP supports an increase in non-residential floorspace which could be used for a variety of businesses sizes/types.

**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?**

### **1.5 Changing Demographics**

As outlined in the Economic Impact Assessment prepared by AEC (refer to **Appendix 6** of the PP), the Burwood LGA had an estimated population of 36,505 people in 2016. This is an increase of approximately 4,306 people (or 1.3% annual average growth) between 2006 and 2016.

The 2016 Population Projections released by DPE, demonstrates households in the LGA are getting smaller, expected to reduce from 2.71 people per household in 2011 to 2.66 in 2036.

Increasing population numbers, combined with smaller household sizes, will continue to place pressure on housing supply in well located and serviced areas in the Burwood LGA. It also highlights the need for ongoing housing diversity as traditional detached dwellings arguably do not suit smaller households.

To accommodate the significant increase in population, the Eastern City District Plan anticipates that Burwood will need to accommodate at least an additional 2,600 dwellings by 2021 (520 dwellings per year). It should be noted that these targets are based on the 2016 district targets, given the revised District Plans do not comprise of specific targets for the Burwood LGA. Further, the targets are minimum thresholds, and can be exceeded if meritorious.

Burwood has 299 dwellings constructed on average per year. This is not sufficient to accommodate the expected increase in population, with an additional 221 dwellings per year required.

Sydney's high cost of housing is well documented. Increasing supply, as the proposal would achieve, will assist with placing downward pressure on housing costs. Furthermore, the public benefit offer associated with this PP contains measures to assist first home buyers to enter the housing market, for example through reduced deposits and extended settlement periods.

The Centre is also expected to accommodate additional jobs, in order to provide employment opportunities to the district population. At present the site does not provide any direct employment opportunities. However, this PP is capable of significantly assisting the Centre in terms of job growth by providing approximately 1,000 jobs.

### **1.6 Existing planning controls**

The preparation of the Burwood Local Environmental Plan (Burwood Town Centre) 2010 commenced in 2006 by the Burwood Town Centre Planning Panel. It was prepared in order to cater for the growth outlined in a previous Metropolitan Strategy. This LEP was translated into the Standard Instrument and amalgamated into the Burwood Local Environmental Plan 2012 (BLEP).

This means the Burwood Town Centre planning controls rely on an evidence base which is up to 11 years old.

It is anticipated a review of the planning controls applicable to the Town Centre will occur as part of the priority precinct process. However, the implementation of revised planning controls as a consequence of this process is at least 5 years away. It would be a highly inefficient use of the subject site, with significant lost opportunity, if amalgamation and redevelopment was dependent on such timeframes.

### **1.7 Infrastructure investment**

This PP has the potential to leverage the significant infrastructure investment occurring within the vicinity of the subject site, including city shaping transport infrastructure investment such as the construction of the WestConnex, Parramatta to Sydney Metro and the Parramatta Light Rail.

The Department of Education recently released its School Assets Strategic Plan, to coordinate funding to accommodate growth across NSW. This includes the upgrade of Croydon Public School, Lucas Gardens School, Marie Bashir Public School and Ashbury Public School, which are all in the vicinity of the site.

## **2. SITE SPECIFIC MERIT TEST**

### **Does the site have regard to the natural environment (including known significant environmental values, resources or hazards)?**

The subject site is currently located in a highly urbanised environment and is occupied by existing residential flat buildings. As a result of existing development on the site, there are no items of significant natural value and no known natural constraints are evident.

The PP includes a contamination assessment (**Appendix 3**) which concludes that the site is suitable for the proposed use.

### **Does the site have regard to the existing uses, approved uses, and likely future uses of land in the vicinity of the proposal?**

The urban design report, heritage impact statement, and traffic impact assessment appended to the PP give particular regard to the proposal's relationship to existing, approved, and future uses in the vicinity of the subject site. Each is summarised below.

### **2.1 Urban Design**

The PP includes an extremely comprehensive Urban Design Report prepared by Architectus.

Amongst other considerations, the Urban Design Report considered the potential impacts of the proposed changes to development controls on the solar access and amenity enjoyed by adjoining properties. The Report determined that the proposed conceptual envelopes will continue to allow for solar access to existing dwellings on immediately adjoining allotments generally in accordance with SEPP 65 and the ADG.

The Urban Design Report also considered potential impacts on distant views. It demonstrates that the proposal will be generally consistent with the envelopes included as part of the Planning Proposal for Burwood Place and the Burwood RSL site, particularly in terms of height.

Generous building separation is provided between existing towers, towers under construction, and sites which are likely to be developed for towers under the Burwood LEP. This ensures any building bulk related overcrowding is minimised, when viewed from a distance. The envelopes developed by Architectus for the purposes of this PP are quite slender, which assists significantly with avoiding building bulk related overcrowding.

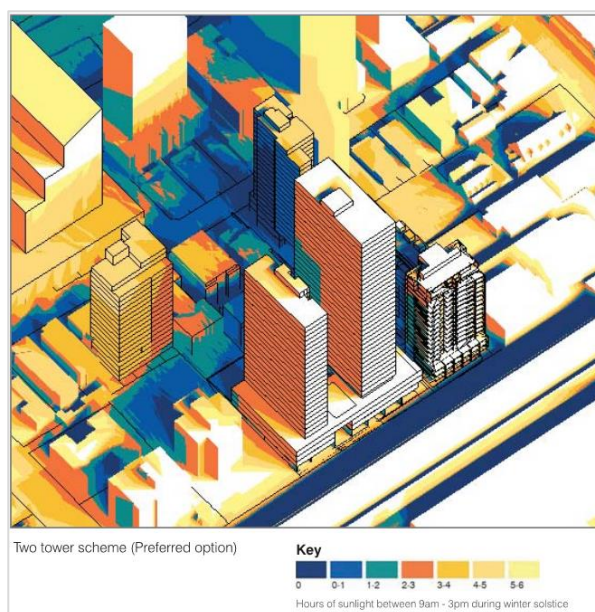


Figure 5: Solar access testing (Source: Architectus Urban Design Report, page 67)

*Note: this image refers to the initial preferred scheme. The preferred scheme has changed marginally in that it is now entirely below the existing building height plane. The degree of solar access compliance remains generally the same.*

## 2.2 Heritage

The PP includes a Heritage Impact Assessment prepared by City Plan Heritage (CPH).

CPH considered the relationship of the proposed changes to development controls in relation to the various heritage related items in the vicinity of the subject site and concluded that overall, the PP's impacts are acceptable.

CPH identified a preferred tower configuration that 'flipped' the two towers with a view to minimise the impact on the Congregational Church at 134A Burwood Road. This concept does not alter the development controls proposed, and could be explored further as part of the development of a DCP.

## 2.3 Traffic

Road Delay Solutions considered traffic related impacts associated with the PP. In summary, their assessment concludes that the proposal would not unreasonably impact on impact on surrounding land uses, provided various traffic management measures were implemented. These traffic improvements are included as part of the public benefit offer.

**Does the proposal have regard to 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.**

Any development at the site would be subject to the existing Burwood Town Centre Contributions Plan. This plan will cater for most of the infrastructure required to cater for demand arising from the proposal. Specifically, the plan seeks to deliver road improvements, upgrading of existing as well as additional open space, various streetscape upgrades such as new street trees, a new library, new childcare/minding facilities, and the like.

The proposal itself will deliver additional public benefits. This includes publicly accessible open space, and most importantly, a new pedestrian link between George Street and Victoria Street. The link will significantly improve pedestrian connectivity between two (2) key points in Burwood, being the railway station and Westfield.



The PP offered incentives for first home buyers, such as reduced deposits, delayed settlements, and the like. It is understood this was not highly valued by Council, however the proponent is nevertheless willing to retain this element of the PP.

### **3. Conclusion**

This correspondence specifically addresses the strategic and site specific merit tests required as part of a Rezoning Review application.

The information provided clearly demonstrates that the Planning Proposal satisfies both merit tests, principally because it:

- Facilitates a significant increase in housing supply and diversity in an area well serviced by existing and proposed public transport and social infrastructure, thereby supporting a key priority in the Greater Sydney Region Plan and Eastern City District Plan;
- Facilitates a significant increase in the quantity of commercial floorspace delivered in the Burwood Strategic Centre, thereby providing employment opportunities and supporting a key priority in the Greater Sydney Region Plan and Eastern City District Plan;
- Contributes to the renewal and revitalisation of the subject site and the urban domain of the Burwood Centre more broadly, through improved pedestrian connectivity, open space and tree canopy enhancements and improved public domain environments; and
- Represents a unique opportunity to leverage significant site amalgamation to facilitate design excellence and create high quality outcomes that meet the amenity and solar access objectives of SEPP 65 and the Apartment Design Guide.

Should you wish to discuss any information in this letter, please do not hesitate to contact me on (02) 8270 3500 or [julietg@cityplan.com.au](mailto:julietg@cityplan.com.au)

Yours sincerely,



**Juliet Grant**  
Executive Director