

18 February 2019

Mr James Matthews  
Pacific Planning  
PO Box 8,  
CARINGBAH NSW 1495

Dear James,

**Re: Planning Proposal - Nos 10-16 Loftus Crescent, 2 Subway Lane, 88-92A Parramatta Road and 5 & 9-11 Knight Street, Homebush**

Reference is made to the Planning Proposal submitted to Strathfield Council on 19 September 2018 for Nos 10-16 Loftus Crescent, 2 Subway Lane, 88-92A Parramatta Road and 5 & 9-11 Knight Street, Homebush seeking consideration of the following amendments to Strathfield LEP 2012:

- Increase the maximum building height controls for the site from part 16m, 21m and 22m to 80m (consistent with the PRCUTS); and
- Increase the maximum floor space ratio control from part 1.65:1 and 2:1 to 5:1 (consistent with the PRCUTS).

Further, the Planning Proposal seeks to amend the identification of the site as a key site on the Floor Space Ratio Map for the purposes of Clause 4.4A Exceptions to floor space ratio (Parramatta Road Corridor) to provide for an additional maximum floor space ratio of 7:1 where certain public benefits are provided.

Council has undertaken a preliminary assessment of the Planning Proposal application and considers that there are a number of issues which would need to be addressed prior to further consideration:

**Precinct Wide Traffic Study**

Council notes that the Traffic Impact Assessment Report, prepared by Lyle Marshall & Partners Pty Ltd (September 2018) was submitted as part of the Planning Proposal documentation, however this Report only provides an assessment based on the development potential (and including the proposed additional development potential of 2:1 to a maximum 7:1) of the subject site.

In accordance with the Action Plan 2016-2023 for the Homebush Precinct in the **Parramatta Road Corridor Implementation Plan 2016-2023**, prior to any rezoning commencing, a Precinct-wide traffic study and supporting modelling is required to be completed which considers the recommended land uses and densities, as well as future Westconnex conditions, and identifies the necessary road improvements and upgrades required to be delivered as part of any proposed renewal in the Precinct.

Until this requirement is satisfied, Council cannot support the progression of any Planning Proposal within the Parramatta Road Corridor as it would be inconsistent with the requirements of the Homebush Action Plan 2016-2023.

In this regard, Burwood, Strathfield and Canada Bay Councils have appointed an independent traffic consultant to prepare a Precinct wide traffic study. This Study will consider the transport infrastructure augmentations required to support increased densities along the Parramatta Road Corridor and will allow the councils to make informed decisions about the impacts of cumulative uplift in the corridor.

### **Isolation of No 7 Knight Street, Homebush**

Council does not support the isolation of No 7 Knight Street, Homebush from the Planning Proposal and considers that a better design outcome could be achieved with the incorporation of No 7 Knight Street, Homebush.

In addition, although the Planning Proposal documentation includes "letters of offer" to the owners of No 1-4/7 Knight Street, Homebush, this documentation is dated May 2016. Council will require appropriate documentary evidence to be submitted to demonstrate that a genuine and reasonable attempt has been made to purchase the subject properties on a fair market value. At least two (2) independent valuations (reports and valuations) undertaken within the last three (3) months are to be submitted. The correspondence must include copies of correspondence between parties and any formal financial offers and responses to offers.

### **Assessment of Public Benefit**

The Planning Proposal is also seeking to amend the identification of the site as a key site on the Floor Space Ratio Map for the purposes of Clause 4.4A Exceptions to floor space ratio (Parramatta Road Corridor) to provide for a maximum floor space ratio of 7:1 where certain public benefits are provided.

The proposed public benefits include:

- a new laneway through the site
- the dedication of land to facilitate additional parking in Loftus Street, the provision of an on-road bicycle lane and improved footpath
- the dedication of a new public park (1250m<sup>2</sup>)
- bus shelter upgrades along Parramatta Road

The EP&A Act describes what a 'public purpose' includes (without limitation) on which Planning Agreements can be based.

Section 7.4(2) describes a public purpose (without limitation) as follows:

- (a) *"the provision of (or the recoupment of the cost of providing) public amenities or public services,*
- (b) *the provision of (or the recoupment of the cost of providing) affordable housing,*
- (c) *the provision of (or the recoupment of the cost of providing) transport or other infrastructure relating to land,*
- (d) *the funding of recurrent expenditure relating to the provision of public amenities or public services, affordable housing or transport or other infrastructure,*
- (e) *the monitoring of the planning impacts of development,*
- (f) *the conservation or enhancement of the natural environment".*

There appears to be no documentation submitted with the Planning Proposal that provides Council with an indication of the value of the proposed uplift.

Council has also undertaken a preliminary assessment of the public benefits proposed in the document prepared by PPM Consulting (August 2018) and makes the following comments:

- The area proposed as public open space appears to be the area of land required to comply with the separation requirements under the ADG. Although the proposed open space will contribute to the “greening” of the Precinct, Council considers that due to its scale, location and facilities provided, predominantly benefits adjoining residents and not the wider community.
- The documentation/discussion provided with respect to the dedication of land to facilitate additional parking in Loftus Street, the provision of an on-road bicycle lane and improved footpath is ambiguous. An improved footpath (public domain upgrades) would be required as part of any future development application on the site and would serve to benefit the proposed development.

The proposed on-road bicycle lane and additional parking in Loftus Street appear to be on Council land and as such provide no additional benefit to Council.

- Bus shelter upgrades along Parramatta Road are not considered for the purposes of increased by Council to be a public benefit.

Prior to any further consideration of the increase in the FSR from 5:1 to 7:1, an economic assessment, prepared by a suitably qualified person is to be provided to Council that provides an assessment of the land value capture proposed by the uplift from 5:1 to 7:1 and also a rate for the residual land value (m<sup>2</sup>) for this Precinct.

Once this documentation has been submitted, Council will undertake a more detailed assessment of the proposed public benefits.

### **Provision of Affordable Housing**

The Planning Proposal as submitted is inconsistent with the Strategic Land Uses requirements of the Homebush Action Plan 2016-2023 in that it does not provide a minimum of 5% of new housing is to be provided as Affordable Housing.

### **Balanced Growth – Increase in Jobs**

The Planning Proposal fails to demonstrate how it aligns with the PRCUTS principle of a *diverse and resilient economy*.

The development is predominantly residential and no real justification has been provided as part of the Planning Proposal for the lack of employment uses on the site. Further detail is to be submitted to Council which provides a breakdown of the amount of employment generating GFA and where this is proposed to be situated on the site.

### **General**

Further to Council's email dated 26 October 2018, can you please update the Authority to Lodge document to reflect the correct Council – the document currently refers to Canterbury Bankstown City Council

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.

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 Manager, Strategic Planning, Ms Rita Vella on 9748 9995 should you wish to discuss the contents of this letter or if you require any further clarification.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Stephen Clements', with a stylized flourish at the end.

STEPHEN CLEMENTS

**Deputy CEO/General Manager Planning, Environment & Urban Services**