

20 May 2019

Mr Stephen Clements  
Deputy CEO/General Manager Planning, Environment & Urban Services  
Strathfield Municipal Council  
PO Box 120  
Strathfield NSW 2135

Attention: Rita Vella

**Planning Proposal**

**10-16 Loftus Cres, 2 Subway Lane, 5 & 9-11 Knight Street & 88-92A Parramatta Road, Homebush**

Dear Mr Clements,

We refer to the letter sent from council's Deputy CEO/General Manager Planning, Environment and Urban Services dated 16 April 2019.

The letter from council raised a number of items regarding the assessment of the above planning proposal. I note that council previously wrote to us on 18 February 2019 and raised similar matters to which we responded on 25 February 2019. This letter responds to those items raised in council's recent correspondence in the same order and heading as the council letter.

**Precinct Wide Traffic Study**

The Department of Planning and Environment (DPE) recently advised, that while it was progressing the Granville and Auburn Precinct Traffic studies which are due for completion in July, Strathfield Council, in conjunction with Burwood and Canada Bay Councils were coordinating the Homebush Precinct traffic study.

We note council's recent email advising that Bitzios Consultants were appointed in 2017 but that the traffic study has experienced a number of delays, including the need to rerun the strategic model. We also note that council advised the delays to the project are outside councils' control and therefore a timeframe for completion of the study could not be provided.

In a supportive effort to the councils' desire to complete the traffic study, we have expressed our concerns with this governance arrangement to the DPE requesting them to also advise on timeframes for progression of the traffic study. We look forward to your further advice on the progress and timing of the study as the delays are better understood.

In the context where there is a level of uncertainty on the date for completion; and noting the amount of resources we have expended to date we feel it is premature to make a decision on the Planning Proposal. We also note that the communication from council staff as a result of the application has raised some very important items for

further consideration. Therefore, whilst we wait for the progression and completion of the traffic study we would seek to work collaboratively with council on these important items. We provide the following responses to the issues raised below:

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

We are in agreement that No.7 Knight Street, Homebush should be included in the Planning Proposal. We have however considered the treatment of the site in a draft development scheme in the lodgement items. However, at this stage in the process, as applicants, we cannot amend the planning proposal to legally include the land as we do not have landowner consent. Council, however, can include this land without landowner consent in its role as the RPA. Once included we can update the planning proposal to include this land.

### **Assessment of Public Benefit.**

We note that Council also raised this issue in its correspondence of 18 February 2019. In our response of 25 February 2019, we provided a land valuation report from a respected and experienced valuation firm and a Quantity Surveyor's report that assesses the value of the works proposed. A high-level description of these benefits was also included in the letter, which is attached for reference.

Also, as previously mentioned, we believe that a meeting with staff will assist understand the details of the offer and attributes of the various items. At this time, we are yet to receive a response on our repeated requests to meet on this matter.

We also note that the public benefits are to be considered under the better planning outcome pursuant to the 9.1 Direction. This is a planning merit consideration, to be considered under the premise of whether the public benefits being offered are a better outcome for the development and the community under the 7:1 density scenario than a 5:1 density scenario where they would not be provided.

In relation to the value uplift, I am not aware of this being a planning merit consideration as required by the guidelines for plan making in the Part 3 process or the relevant 9.1 direction. We would be open to consider such assessment if the Minister's delegate advises that such methodology of calculating the better planning outcome is appropriate.

We note that the development is feasible at a density of 5:1 in accordance with the PRCUTS, however, the development is also feasible at a density of 7:1 but provides a better planning outcome with a number of public benefits including: open space, dedication of land around the boundary for road widening, and the construction of the bus shelter. While these have a monetary value, which we have provided, they also have a planning, social and community impact which has been presented as part of the Section 9.1 justification. We suggest that a meeting with council staff will assist to further consider this merit issue.

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

As mentioned above, in our letter of 25 February 2019 we requested a meeting to discuss this aspect. We do not oppose further consideration of the land use ratio mix and an increase in employment generating floorspace. The Planning Proposal does however only seek a total density control with no mix of residential and commercial uses. The scheme lodged that supports the planning proposal to amend the land use controls and will not obtain any form of development approval; it is just a concept for consideration and discussion at this time in the process.

In regard to the exact breakdown, this has been provided on page 27 of the urban design report, but I again reiterate this is not for approval within the Part 3 process and will be further studied and assessed in a Part 4 process.

What is clear however, is that at this stage early in the process, where the controls align with those recommended by the PRCUTS, we are at present prevented to progress further study and assessment. We feel that the best outcome for the site and the development is to work collaboratively with the Council. We as stakeholders taking the risk to deliver the project have a preliminary market view on what is required to create a successful and orderly development. In that regard, the mix of uses put forward was for discussion. However, we also acknowledge that council is a key stakeholder and likely knowledge source regarding appropriate considerations for employment land use mixes required in the precinct. We are keen to understand the level of employment that council considers appropriate for the site including any substantive research undertaken that the project can benefit from in guiding its delivery to ensure it will sensibly assist to meet the projected future needs.

Therefore, we again request to meet to work collaboratively on the project and get the best outcome for the site in terms of housing supply, jobs and better planning outcomes for the community.

### **Conclusion**

We do not favour a withdrawal of the application at this time. We note council is seeking to complete the traffic study and in part the delays to the study are under council's management. We note that council has advised us that currently council is waiting for the DPE to respond. We have also followed up with the DPE seeking a response and assistance to complete the study. It may therefore be likely that the study can be completed within the coming months.

We note that there are a number of other items that can be considered further whilst the study processes complete. As such we would seek to continue to work with council on these merit assessment items whilst we wait for advice from the DPE.

Further, we do not feel the consideration of the Planning Proposal as submitted is a sensible option conducive of an orderly development outcome and administration process. Noting there are other items of the application raised by council that we feel would benefit from further discussion and response iterations we would seek to continue to work with council on those issues as it will inform a better assessment of the application.

Therefore, we look forward to meeting with council staff to discuss the contents of this letter in more detail and the further discussion leading from the public benefit offer items. If you have any questions in relation to this matter, please do not hesitate to contact me on 0437 521 110.

Yours sincerely



**James Mathews**  
**Planning Director**  
**Pacific Planning**

### **Attachments:**

1. Pacific Planning Response letter to Strathfield Council, dated 25 February 2019
2. Cost Analysis of the value of the works, prepared by QPC&C
3. Valuation report, prepared by Cushman & Wakefield