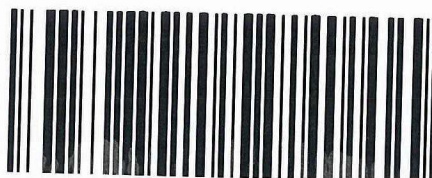


16 Memorial Avenue
PO Box 42
Merrylands NSW 2160

T 02 9840 9840
F 02 9840 9734
E hcc@holroyd.nsw.gov.au
www.holroyd.nsw.gov.au

DX 25408 Merrylands
TTY 02 9840 9988
ABN 20 661 226 966



PCU024539

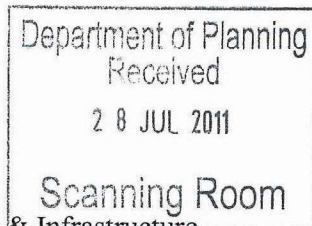
Environmental & Planning Services

Reference:
Contact:
Telephone:

PR-735-1-0
Natalie Stanowski
02 9840 9838

11 July 2011

Michael Druce
Department of Planning & Infrastructure
3 Marist Place
PARRAMATTA NSW 2150



Dear Michael

**SEPP (INFRASTRUCTURE 2007) APPLICATION FOR SITE COMPATIBILITY
CERTIFICATE FOR 1 ROLAND STREET GREYSTANES**

I refer to your letter dated 28 June 2011 regarding the lodgement of a site compatibility certificate application for 1 Roland Street Greystanes, under State Environmental Planning Policy (Infrastructure) 2007. Council provides the following comments in relation to the application.

Zoning, Land Use and Accessibility

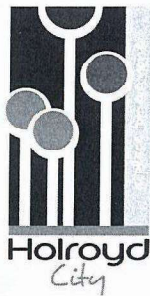
Under Holroyd Local Environmental Plan 1991, the subject site is zoned 5(a) Special uses "School". As the Department is aware, Council has substantially progressed the preparation of a new Local Environmental Plan (LEP) for the whole of Holroyd local government area. A number of the studies and strategies which have informed changes to the new LEP are relevant to the draft zoning of 1 Roland Street, Greystanes.

Council's Urban Character Study prepared in 2007 to inform the Residential Development Strategy identifies the Roland Street area as a location of "low- longer term change". It is located in the study within the Greystanes Commercial Centre Precinct, which the character study proposes potential medium to high density forms of housing from the existing shopping centre to Holroyd High School. It is noted that 1 Roland Street was not investigated for residential use opportunities during the study, as it was within Holroyd High School grounds.

Council's Draft Residential Strategy (RDS) designates a hierarchy of centres for future residential development in Holroyd, as defined in the Sydney Metropolitan Strategy. Greystanes Commercial Precinct is designated as a small village, encompassing a radius of 400m. Roland Street falls within this catchment.

The RDS indicated limitations in the accessibility of the precinct. Pedestrian routes to the shopping centre are constrained, due to the road network and limited pedestrian permeability. 1 Roland Street is approximately 570m walk to the shopping centre. Two regular bus services to Merrylands, Parramatta or Liverpool are available near Roland Street, although they are located greater than 400m walking distance from Roland Street.

On this basis, the RDS proposed rezoning properties between Merrylands Road to the north side of Eldridge Street as R3- Medium Density, along with sites west of Cumberland Road. All remaining existing residential properties are proposed as R2 Low Density Residential.



Draft Holroyd Local Environmental Plan zoning for the Greystanes Commercial Precinct is consistent with the recommendations of the RDS. The Draft LEP is also consistent with Department of Planning practice note PN 08-002 *Zoning for Infrastructure in LEPS*. Draft Holroyd LEP proposes R2 Low Density Residential for 1 Roland Street. This zone would not permit multi dwelling housing.

Existing and Surrounding Land Uses

As indicated above, 1 Roland Street is considered within the Greystanes Commercial Precinct. The precinct contains a shopping centre, tavern, small community library branch and Holroyd High School. There is very limited public open space in the north of the precinct, although the Lower Prospect Canal is approximately 600m walk from 1 Roland Street and provides some recreation opportunities.

A recent land use survey of medium density development in the Greystanes Commercial Precinct indicates only two town house developments in the precinct, including a Department of Housing site. It is noted there are 13 Dual Occupancy developments, predominately in Royce Street.

The Greystanes Commercial Precinct is generally characterised by low scale residential development. Draft Holroyd LEP has proposed zones that acknowledge the land use opportunities of the small village and also the accessibility constraints and existing character of the precinct.

Environment

As noted in the application, the site contains a number of stands of Cumberland Plain Woodland vegetation. The report and appendices provided by GHD incorrectly note and assess the vegetation as an “Endangered Ecological Community”. Cumberland Plain Woodland (CPW) has been elevated to a “Critically Endangered Community” in the Threatened Species Act (TSA) and Environmental Protection and Biodiversity Conservation Act (EPBC), and therefore the requirements regarding the retention of CPW have changed.

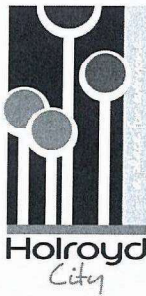
As such, the reports provided as part of this site compatibility certificate application on the health, condition, and makeup of trees/plants within the two tree protection zones (TPZ), as identified on the 88B Instrument for 1 Roland Street, are outdated, as they do not acknowledge the elevated requirements of the TSA and EPBC Act. Up to date and relevant reports should have been provided as part of this site compatibility certificate application.

The proposed masterplan prepared by GHD included in the application will impact a number of trees within each of the TPZ areas. The encroachment will require the removal of 4 trees. The studies provided do not address the potential removal of trees within the two TPZ and its environmental impacts.

Proposed Masterplan

The proposed masterplan for 24 dwellings for 1 Roland Street has been assessed and Council can provide the following points:

The application does not specifically indicate the traffic impact of the proposed development on the surrounding street network, noting that Roland Street is a cul-de-sac and the masterplan proposes more than double the number of dwellings existing on the street.



The Masterplan provided is not clear as to the provision of garages within the development. A minimum of 24 residential spaces would be required under Holroyd DCP 2007 if a maximum of 2 bedrooms per dwelling was proposed. The proposal appears to only provide 20 open car parking spaces. Where garages are proposed, a minimum setback of 5.5m to the garage is required to enable adequate stacked parking. This could not be determined on the proposal, as setbacks were not provided.

Further detail is required regarding how garbage and recycling bins will be presented for collection. If bins are to be presented to Roland Street, there is a significant travel distance for bins to be wheeled to the kerb. There is insufficient manoeuvring area for garbage trucks and generally garbage trucks do not enter private driveways. Provision must be made for bin storage via rear yards, within garages or storage sheds

There is no indication in the proposal for the provision of pedestrian pathways, to ensure the minimisation of conflicts between pedestrian and vehicular movements.

Given the east-west orientation of lots and the building envelope indicated on the proposal, concern is raised that lots 18, 20, 22 and 24 will not receive sufficient solar access.

The proposed density of the proposal is indicated in the application as 1 dwelling per 500m². This appears to include land within the TPZ's. The actual lot sizes range from 187m² to 254m², which for the portion of land where development will actually occur (excluding the TPZ's) is a much higher density than stated in the application. This is not consistent with the surrounding dwelling character.

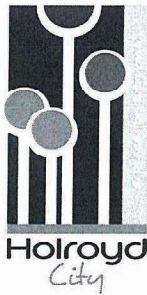
The proposal indicates a mix of single and two storey dwellings. Council's Development Control Plan 2007 (DCP) only permits two storey development at the street front. The proposal is not considered to be consistent with the established surrounding development.

Council's DCP requires a minimum street frontage of no less than 20 metres: The proposal does not comply with this provision.

The Masterplan appears to indicate the location of back fences facing onto the northern TPZ. This would not be consistent with Crime Protection through Environmental Design (CPTED) principles of Access, Ownership and Surveillance.

Due to the provisions within the 88B Instrument and TSA and EPBC, there may be an opportunity for fire risk within the northern TPZ. The proposal would be required to cater for fire and emergency vehicle access.

It is noted that the masterplan proposal lodged with the site compatibility application is not consistent with the indicative lot layout lodged with Development Application 2003/296 for the subdivision of the site from Holroyd High School, and therefore concerns raised in this letter may be different to those discussed during the DA process.



Public Interest

Council notes the large public interest in the land at 1 Roland Street Greystanes. During the public exhibition of DA 2003/ 296 relating to the subdivision of surplus lands from Holroyd High School, Council received in total over 200 submissions including petition signatures.

Summary

Council has undertaken studies to inform the preparation of the Draft LEP, including a Draft Residential Development Strategy. Council exhibited the Draft LEP in late 2010, zoning 1 Roland Street Greystanes as R2 Low Density Residential. This proposed zoning is consistent with the predominant character of surrounding land uses. The application proposal of attached housing would not be permitted in the R2 zone.

1 Roland Street Greystanes contains two tree protection zones as easements on the land. These contain the critically endangered ecological community of Cumberland Plain Woodland. The application and its assisting reports do not report this correctly, and therefore do not consider any adverse impacts of future development on the site appropriately.

The application contained a proposed Masterplan for the site. While the application did not provide a clear indication of floor space ratio, setbacks and further details, a preliminary assessment by Council concluded that the proposal provided several significant non compliances essential for the accommodation of the land use.

While Council understands that the existing surrounding zoning of 2(a) residential permits the development of an attached housing dwelling type, the proposal does not comply with Council's development controls for medium density development and would not be compatible with the surrounding existing land uses and dwelling character. Furthermore it is noted that Council's Draft LEP is substantially progressed, and any future land use zoning changes would require a planning proposal.

If you have any further question, please contact Natalie Stanowski of Council's Strategic Planning Section on 9840 9838.

Yours faithfully

Merv Ismay
GENERAL MANAGER

Per:



ADAN DAVIS
MANAGER STRATEGIC PLANNING