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Department of Planning and Environment &
Sydney Olympic Park Authority
Level 22
320 Pitt Street
Sydney NSW 2000

Via – electronic upload on DPE website

Dear Sir/Madam,

SUBMISSION TO SYDNEY OLYMPIC PARK MASTERPLAN (2016 REVIEW) AND AMENDMENTS TO SEPP (STATE SIGNIFICANT PRECINCTS) 2005

Thank you for the opportunity to provide comments on the Sydney Olympic Park Master Plan (2030) Review 2016. The letter is prepared by Urbis on behalf of our client, Austino Property Group (Austino).

Austino is the leaseholder of Nos.1 and 2 Murray Rose Avenue. This forms part of the site known as 1-5 Murray Rose Avenue (Lot 88 DP 870992) which has an area of 24,515 square meters. The site largely occupies the land referred to as Site 60A and part of Site 60B in the Sydney Olympic Park Master Plan.

Figure 1 overleaf contains an aerial photograph of the Sydney Olympic Park with the sites annotated.

In light of this, Austino takes great interest in the Review given that it directly affects two sites in which they have a future interest. Therefore, this letter provides a response to the public consultation exercise. The following sections address the Master Plan Review and responds directly to the building height and Floor Space Ratio control alterations.

It should be noted that Austino Property acquired the leases in December 2015. This was after SOPA had consulted stakeholders as part of the review process and as such their views as a stakeholder have not been able to be considered in drafting of the Master Plan.

Figure 1 – Aerial Photograph of Site



MASTER PLAN REVIEW

We acknowledge that a significant amount of work has been undertaken as part of this Review. It aims to revisit and update the strategies in the planning documents associated with the Master Plan which we support. The aim is to ensure the framework remains current and relevant in order to provide a comprehensive approach to the future development of Sydney Olympic Park.

On behalf of our client, Austino, we wish to support the wider vision and direction of the Master Plan update. This includes the future vision that Sydney Olympic Park is be an active and energised town centre, which provides a comprehensive range of services that support residents and workers, and enables businesses to prosper.

These amendments are welcomed, in particular the revision to the future targets for the precincts which seeks an increase in residential development floor space from 575,000sqm to 855,000sqm, in order to promote new communities within the Olympic Park. This is alongside the broad range of

complementary commercial, retail, recreational, institutional and venue uses, which together amounts to an overall increase of 460,000sqm of additional floor space beyond previous targets.

In addition, we wish to support the overall principle of increasing the height limits in appropriate locations and the Floor Space Ratio (FSR) on currently undeveloped sites across the Olympic Park, which will help to stimulate further investment within the individual precincts in order to achieve the increased floor space targets. In particular, the provision of new residential dwellings in locations which overlook parklands and take advantage of the amenity this provides is strongly supported.

SITE DETAILS

The sites which are located at Nos. 1 and 2 Murray Rose Drive in the Parkview Precinct are retained for residential use, and this is wholly supported.

The subject sites make up a portion of sites 60A and 60B, with the remainder comprising 2 x existing commercial office developments on the balance on site 60A, and one approved (un-built) office development on the remainder of site 60B known as 4 Murray Rose Avenue.

Murray Rose Avenue that bisects the two sites is now a constructed road. Figure 2 below contains images of the office development in this locality.

Figure 2 – Images of the Office Developments at Murray Rose Avenue



EXISTING BUILDING



EXISTING BUILDING



APPROVED BUILDING (4 MURRAY ROSE)

AMENDMENTS TO CONTROLS

It is acknowledged that the review seeks to increase residential densities within the Parkview Precinct to ensure the highest and best use of amenity sites, whilst also increasing building heights towards the northern and western edges of the precinct to maximise views across the Parklands.

This approach is supported, as it provides a great opportunity for developing high quality residential accommodation along north eastern edge of the Olympic Park. It is also considered that the sites fronting onto Bennelong Parkway, with views to the parklands and open space situated immediately to the east should also benefit from this increased density and height, due to the high amenity available.

The proposed changes under, the Master Plan Review, to 1 and 2 Murray Rose are as follows:

	FSR		Height (storeys)		Setback	
	Current	Proposed	Current	Proposed	Current	Proposed
1 Murray Rose	2.5:1	3.0:1	4/8	6/8	zero	3m to Bennelong Pwy
2 Murray Rose	2.5:1	3.0:1	4/8	6/15	zero	3m to Bennelong Pwy

From the above table it is clear that the main amendments as part of the Master Plan Review concern the increased FSR and the maximum height limits for podiums and towers.

In view of the above, we wish to make recommendations in respect to some of the proposed amendments, as they apply to the site. These are outlined in the following paragraphs.

1. Building Heights

The building height plan contained within the Precinct Controls section of the Review sets out the updated maximum height limits for the precinct. Figure 3 overleaf is an extract from the existing Parkview Precinct height limit controls in the present Master Plan.

In addition, Figure 4 on Page 6 of this letter identifies the 2016 Master Plan Review position and the Austino proposed amendment to the height of building controls. It is evident that there is a 'tower storey zone' running along the centre of the precinct on the 2016 Review Master Plan (illustrated in dark red) which forms a 'spine' of taller development through this part of the precinct. The height limit for these blocks is 15 storeys for the tower, with a six storey block edge. It can also be seen from the plan that this spine does not extend northwards beyond Murray Rose Avenue to the final block in this corner precinct.

We request that the tower zone height limits within the precinct are extended onto Lot 60A and 60B to provide the opportunity for the erection of new towers up to 15 storeys with 6 storey block edges at this location. This is illustrated on the right hand side plan of Figure 4, with the key for this included in Figure 3 overleaf.

This approach would be consistent with the objectives for the Parkview Precinct as set out within the Summary of Proposed Planning Changes prepared by the Department, which identifies an objective to *"increasing residential densities to ensure the highest and best use of high amenity sites"*.

Figure 3 – Existing Master Plan Controls Building Heights

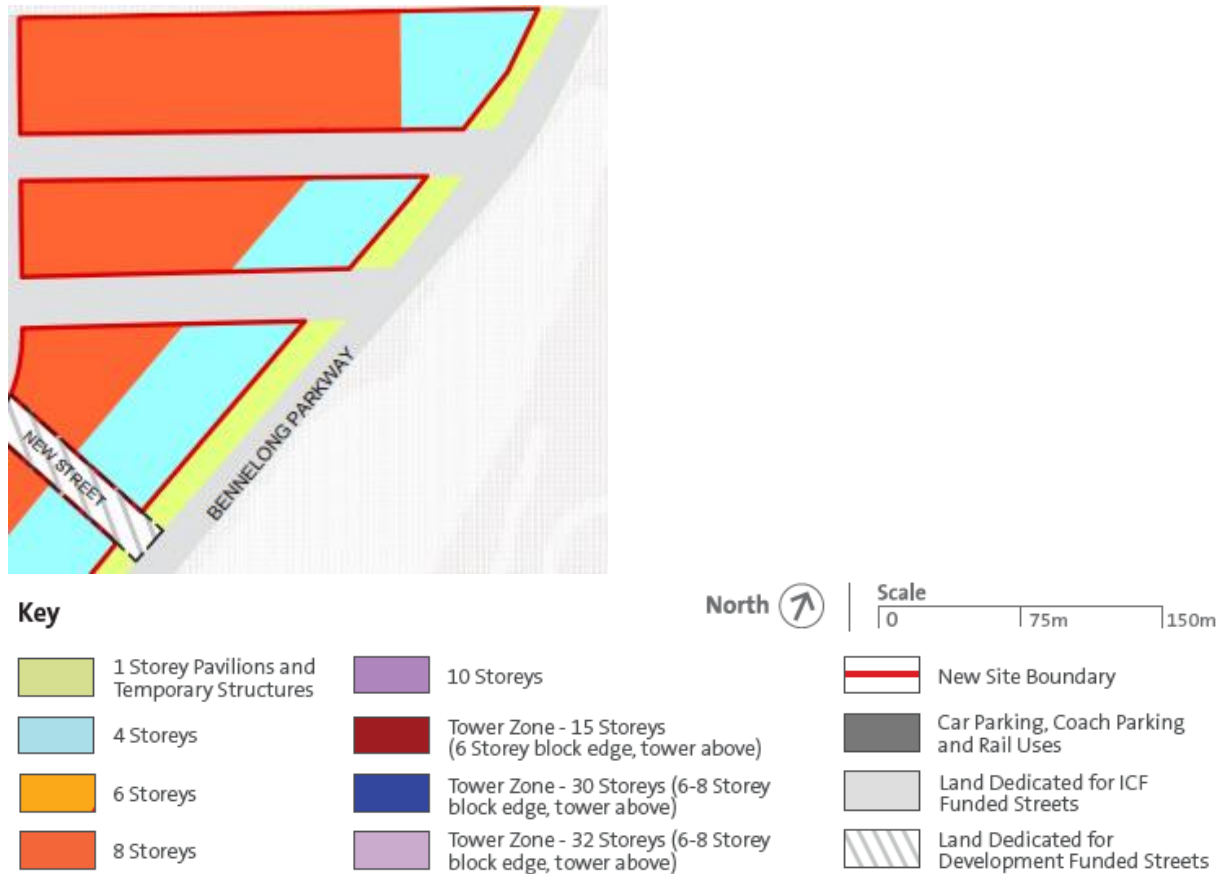
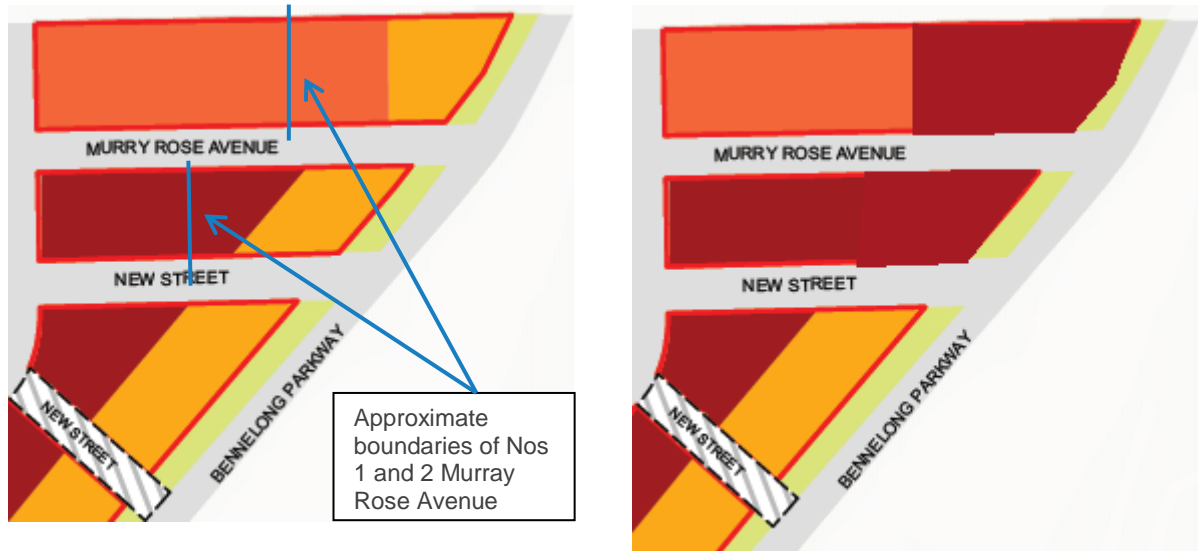


Figure 4 – 2016 Proposed and Austino Proposed Amendment Building Heights Plan



Draft Master Plan 2016

Austino Proposed Amendment

Our reasons for the changes to building height onto Lot 60A and 60B are summarised below:

1. **Urban design principles not undermined** – the masterplan places tall tower forms along the two boulevards. For the Parkview Precinct the heights actually do not consistently step down east of Australia Avenue – they are actually quite varied. At the southern end of Parkview, Site 68 creates a 'marker' tower form at 97metres in height. Our proposal is not seeking to create another tall marker form, but rather ensure the edge of the residential precinct is signalled by a building form higher than a lower street-edge form providing a strong block-definition to this north eastern side of Parkview Precinct.
2. **High Amenity sites-** Taller residential buildings on the subject sites would offer significant amenity benefits for future residents due to the aspect and views of the surrounding brick pit site to the north and parkland to the east. This setting would clearly be maximised if taller residential towers were facilitated given the aspect will not be impeded in the future.
3. **Solar Access** – As these site are the situated within one of the most easterly locations within Sydney Olympic Park, the additional height can be achieved with minimal impact on the solar access of neighbouring buildings. Due to this advantageous position, additional building height should be permitted.
4. **No Environmental Impacts** – The Planning Report prepared by the Department identifies that height controls would be implemented to protect views, define streets and maximise solar access to open space. This appears to be a general comment and not specifically relevant to this site. This height control cannot reasonably be set to preserve solar access to the surrounding parklands, given that Australia Tower is constructed within the precinct which would already cast a shadow on the surrounding parks. Equally, any suggestion that heights

have been limited due to potential ecological impacts (light spill, overshadowing etc) are not apparent and would be at odds with previous approved developments like Site 68 which would have the same proximity to environmental lands. Based on our assessment of the planning principles underpinning the master plan changes, there is no fundamental constraint to increasing the height to the extent proposed.

5. **No impact on Sporting or Stadia Precincts** - We understand the sensitivities of residential development close to the event precinct. The subject sites are obviously well-separated from the events precinct and thus allowing more height would not create any interface issues. Taller residential buildings on the subject sites would offer significant amenity benefits for future residents due to the aspect and views of the surrounding brick pit site to the north and parkland to the east. This setting would clearly be maximised if taller residential towers were facilitated given the aspect will not be impeded in the future.
6. **Provides flexibility to achieve design excellence** – Allowing additional height will enable architects through the competitive design process to masterplan the best arrangement of building forms and height on the site within the FSR controls.
7. **Better utilisation of allocated floor space** - Sites 60A and 60B accommodate two commercial buildings and one approved un-built building that will proceed to construction in its current design, which are accessed from Murray Rose Avenue. Recent discussions between the leaseholders of that No.4, GPT, and Austino have occurred following the release of the Master Plan Review. These discussions identified that they will construct the building as approved, and not seek to amend the scheme to utilise the potential new 15 storey height limit control.

This fits with the commercial/ residential desired split of the site. Given that the FSR across the 'super-lot' covering all five buildings is being proposed to be increased to 3:1, it is unlikely that the allowable would be fully realised unless the height limit is extended for the site.

8. **Impact on Neighbouring Properties** – Nos. 1 and 3 Murray Rose Avenue have been constructed and are commercial buildings. No. 4 Murray Rose Avenue has an approval to construct a six storey commercial building. An amendment to the controls to permit a 15 storey tower with 6 storey podium on No.1 Murray Rose Avenue will not impact upon the commercial building neighbours in terms of views and in terms of solar access or shadowing due to sufficient separate and high levels of existing amenity.
9. **Delivery** – the draft masterplan identifies much of the residential land will be long term development prospects owing to existing leases or value of the current commercial land uses. In our opinion, Nos. 1 and 2 Murray Rose Avenue are realistically the only sites in this part of the Parkview Precinct that can be developed for residential purposes over the next ten years. Allowing some flexibility to the height control will ensure that a reasonable quantum of residential development occurs in the short to medium term.

2. Amendments to the Site Area

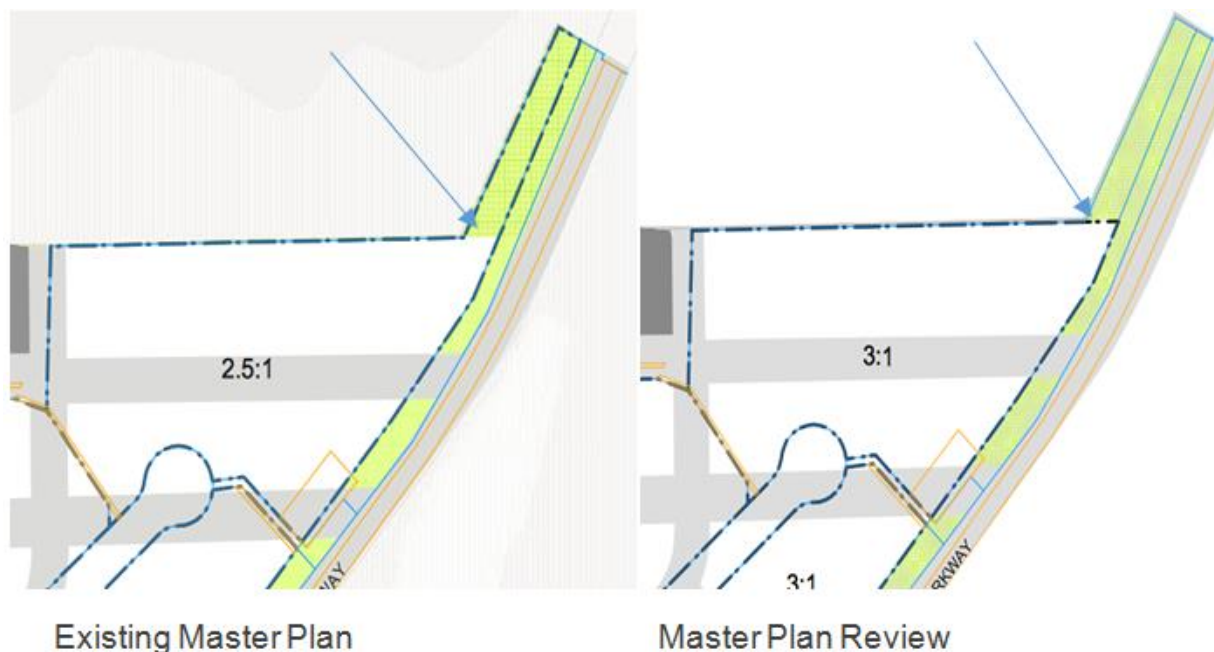
There is a critical point of clarification in relation to the extent of the boundary for the purpose of calculating FSR. Nos.1-5 Murray Rose Avenue (Lot 88 DP 870992) has an area of 24,515sqm with an overall FSR of 2.5:1 under the current Master Plan, Figure 5.39.

As the Figure 5 below illustrates, the strip of land which extends northwards along the Bennelong Parkway frontage forms part of the same lot under the existing Master Plan. The Master Plan Review appears to exclude this strip of land which totals 1,570sqm, reducing the area for FSR purposes to 22,945sqm. This in effect reduces the proposed FSR of 3:1 to 2.79:1, meaning an FSR of 3.2: would be needed to compensate for the reduced area.

It has long been agreed with Sydney Olympic Park Authority (SOPA) that this land is part of the site for the purposes of calculating FSR and there is nothing in the Review document relating to this being one of the amendments.

Therefore, in order to avoid ambiguity, we request that the site area for FSR purposes be maintained at 24,515sqm. As such, the area within the boundary as illustrated in Figure 5.39 Parkview Precinct Site Floor Space Ratios Plan should not be amended, other than the FSR increase, from that represented in the existing Master Plan.

Figure 5 – Plans Illustrating Extent of Site



3. Other Minor Matters

We wish to raise the point that Figure 5.42 – Building Zones and Setbacks Plan identifies minimum through site links and widths. While a minor point, we wish to raise that approvals have been granted at 3 Murray Rose Avenue (Ref: MP11_0082 & Modification 1) for 18m wide links on the sites to the west and therefore to avoid future ambiguity, we suggest that the control be amended to 18m to reflect the approved pattern that currently exists.

RECOMMENDATIONS

In light of the above, it is suggested that a number of amendments are made to the controls at Parkview Precinct in order to address the matters raised in the above sections.

The recommended amendments are as follows:

1. The Building Heights are increased to 15 storeys including a six storey podium at northern part of Parkview Precinct, in order that new residential towers can be developed at 1 and 2 Murray Rose Avenue which benefit from the high levels of amenity. This will enable a better realisation of the potential of the FSR on Lot 60A and 60B which would otherwise be constrained by the height restrictions.

It is therefore requested that **Figure 5.41** of the draft Masterplan is amended to extend the Tower Zone such that it continues further north to the edge of the park and fronts onto Bennelong Parkway at the intersection with Murray Rose Avenue, in order to capture the significant opportunities that this site presents. This amendment should also be captured in the SEPP Plan Alteration for **Heights of Building Map**.

2. **Figure 5.39** Parkview Site Floor Space Plan Ratios Plan boundary as documented in the existing Master Plan should not be amended, as it relates to the area for 1-5 Murray Rose Avenue (lot 88 DP870992) thus maintaining the existing area of 24,515 square meters for the purposes of FSR.
3. Update the notation of the through site links on Sites 60A and 60B to be 18m to reflect the existing situation. This avoids ambiguity in the future development of the residential portion of these sites.

It is therefore requested that **Figure 5.42** of the draft Masterplan is updated to reflect this change.



We trust that these amendments can be accommodated within the next stage of the SOPA Masterplan and SEPP Amendments. I would of course be pleased to discuss this issue further and meet as necessary in order to clarify any questions. Please contact Nik Wheeler 8233 9901 or myself on 8233 9955.

Yours sincerely,

A handwritten signature in black ink that reads "Stephen White". The signature is written in a cursive, flowing style.

Stephen White
Director - Planning

Stephen White
Director