



AB/KVDZ

6 March 2017

Mrs Lucy Turnbull
Chief Commissioner
Greater Sydney Commission
PO Box 257
PARRAMATTA NSW 2124

Attention: Maria Atkinson AM

Dear Maria,

**TOWARDS OUR GREATER SYDNEY 2056 – CENTRAL DISTRICT
NORTH STRATHFIELD RESIDENTS GROUP SUBMISSION**

We thank you for the opportunity to provide comment on *Towards our Greater Sydney 2056*. This submission has been prepared by JBA on behalf of North Strathfield Residents Group, who represent the owners of land bound by Conway Avenue, George Street, Allen Street and Powells Creek, North Strathfield (the Site). It relates specifically to the role of the Site within the context of the Central District and the broader priorities of *Towards our Greater Sydney 2056* (the Plan), including those outlined in the *Parramatta Road Corridor Urban Transformation Strategy 2016* (the Strategy).

We would like to acknowledge the considerable time and effort that has been invested in the preparation of both the draft District Plans and the Strategy. They provide a solid foundation from which to plan for growth and urban renewal and to generate a major shift in strategic planning for Greater Sydney.

We write to you to respectfully request the Greater Sydney Commission (GSC) consider the role of the Site in the context of the Plan and its priorities and to ensure synergies between it and the Strategy. This is to ensure that these consistently meet the greater strategic planning objectives for Sydney.

This submission outlines the background of the Site in the context of the Strategy and recommends a review of the proposed planning controls in the context of the District Plan. This is on the basis that a rezoning of the Site will achieve greater density and development along a key public transport and urban renewal corridor and facilitate delivery of the 30-minute city.

Recognising that the Site is within 300m of North Strathfield and Concord West railway stations, has direct access to WestConnex, is centrally located between Parramatta CBD and the Sydney CBD, is within minutes of Rhodes and Macquarie Park, and is located immediately adjacent to Sydney Olympic Park, for these reasons and more, it has the unique characteristics that align with the city shaping objectives of *Towards our Greater Sydney 2056*.

In outlining the background of the Site, we also attach UrbanGrowth NSW and Strathfield Residents Group Meeting Minutes dated 8 December 2016 (**Attachment A**).

1.0 EXECUTIVE SUMMARY

In support of the priorities of *Towards our Greater Sydney 2056* and the *draft Central District Plan*, there are compelling planning arguments for the inclusion of the Site within short term local precinct planning and Council led LEP amendments. Chiefly, the ability of the Site to satisfy the priorities of *Towards our Greater Sydney 2056* and the *draft Central District Plan* through urban renewal around existing infrastructure and the provision of new housing along an established transport corridor.

An area already surrounded by medium and high density residential and mixed use development, and an area undergoing transformation, the opportunity to create more compact, walkable, pedestrian-oriented development within 300-800m of North Strathfield and Concord West railway stations is convincing. The Site's closer proximity to public transport than other sites already rezoned and proposed to be rezoned for high density development, reinforce its ideal location.

Within minutes of Sydney Olympic Park, the Site has superior access to significant regional open space and recreation and employment opportunities. Having proximate access to the A3 regional arterial road (Homebush Bay Drive), Parramatta Road, and WestConnex, the Site is within 15 minutes drive to major employment centres including the Parramatta CBD, Sydney CBD, Rhodes and Macquarie Park. The possibility of a potential future Light Rail connection or MetroWest through the Precinct will further enhance accessibility to these key centres.

Recognising the broader urban structuring elements and the patterns of development in the locality, the Site encapsulates key organising elements that enable it to support a liveable, productive and sustainable neighbourhood that will create an efficient and resilient community that will meet the priorities of the Plan. Comparable to the Rhodes peninsula, the area is contained by large urban structuring elements which define its edges, movements and its relationships.

Identified in the *draft Parramatta Road Corridor Urban Transformation Strategy* as an area suitable for high density residential development, the Strategy's objectives are aligned with those in the *draft District Plan* and include provision of a diversity of housing types, creation of a diversity of jobs closer to homes, better connected places and movement networks and the creation of liveable, local Precincts. The logic for excluding the Site from the final Strategy given its proximity to North Strathfield and Concord West Railway Stations and commercial and retail services and schools along George Street, comparative to other sites which are further away from public transport and infrastructure yet were up-zoned, contradicts the objectives of the *draft District Plan*. The impact of this creates inverse planning logic and an island of low density residential development surrounding key public transport with higher density development located further away.

For these reasons, we respectfully request that the Greater Sydney Commission (GSC) consider the appropriateness of the Site for more efficient development typologies and densities in the short term to meet the priorities of the *draft District Plan*.

2.0 THE SITE

The Site, bound by Conway Street to the north, George Street to the east, Allen Street to the south and Powells Creek to the west, is in the inner-west suburb of North Strathfield within the Canada Bay Local Government Area (refer to **Figure 1**). The area is characterised by a mix of residential, commercial, light industrial and infrastructure uses.

The Site currently contains 267 properties consisting of 1-2 storey detached residential dwellings. Under the *Canada Bay Local Environmental Plan 2013* (CBLEP 2013) the Site is primarily zoned R2 Low Density Residential with a maximum building height of 8.5 metres and maximum FSR of 0.5:1.

Surrounding the Site, there is a mix of *R3 Medium Density Residential*, *B4 Mixed Use*, *B3 Commercial*, *IN1 Industrial*, *RE1 Public Recreation* and *SP1 Infrastructure* zoned land. The *IN1 Industrial* zoned land is proposed to be rezoned under the Concord West Precinct Master Plan and *R4 High Density Residential* zones are proposed under the *Parramatta Road Corridor Urban Transformation Strategy*. The Bakehouse Quarter, MacDonald College, Our Lady of the Assumption Primary School and existing high density development including Strathaven, contribute to a mix of typologies and densities and character surrounding the Site.

From a broader perspective, the Site is located within an area that is contained by large urban structuring elements including the T1 Strathfield to Epping Northern Railway Line to the east, the M4 Motorway, West Connex and Parramatta Road to the south, and Bicentennial Parklands, Powells Creek and the A3 arterial road to the north and west. These elements define the north-south orientation of the Site, ensuring it maintains a cooperative relationship with the railway line and cannot extend east-west. This area is identified as the Homebush Precinct under the *Parramatta Road Corridor Urban Transformation Strategy 2016*.



Figure 1 – Aerial of the Site
Source: JBA/ Nearmap

3.0 A REVIEW OF PROPOSED PLANNING CONTROLS FOR THE SITE IN LINE WITH THE DRAFT DISTRICT PLAN

3.1 Consistency with Key Planning Strategies and Policies

A Plan for Growing Sydney

The NSW Government's *A Plan for Growing Sydney (2014)* outlines the future vision for Sydney, providing a strategy to manage the city's change and growth over the next 15 years. To achieve this vision, the following four goals are set out. These goals are further underpinned by directions and actions:

1. *A competitive economy with world class services and transport;*
2. *A city of housing choice with homes that meet our needs and lifestyles;*
3. *A great place to live with communities that are strong, healthy and well connected; and*
4. *A sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.*

The Plan responds to Sydney's needs as a growing global city, establishes broad spatial principles for land use change, and sets out a framework to facilitate growth through coordination of planning and infrastructure delivery. Whilst not specifically identified in *A Plan for Growing Sydney*, North Strathfield and Homebush are strategically located near the strategic centres of Rhodes, Burwood and Sydney Olympic park and within the Global Economic Corridor. The Site is also located equidistant to the Sydney CBD and Parramatta City Centre. Under the Plan the Parramatta Road Corridor "will be a focus for increasing housing, economic activity and social infrastructure, especially around centres with good public transport access and amenity". The Plan supports the notion of Transit-orientated development (TOD), a term used to describe the trend of compact, walkable, mix-used communities centred on high quality train systems. Due to their superior public transport accessibility, rail based centres have been identified for increased growth. The Site is located within 300 and 800 metres of two railway stations, North Strathfield and Concord West and is strategically located for higher density development in accordance with the Plan. As noted above, the Site is located in closer proximity to a train station than areas further west which under the Strategy have been recommended for rezoning. In addition, WestConnex and the potential future Light Rail or MetroWest, will further improve accessibility and movement to and from the precinct to other key strategic centres within Sydney.

A proposed amendment to the Site's planning controls to facilitate higher density development aligns with multiple directions within the Plan, specifically:

- Direction 2.1 which aims to accelerate housing supply across Sydney.
- Direction 2.3 which aims to improve housing choice to suit different needs and lifestyles.
- Direction 3.1 which aims to revitalise existing suburbs.

The Site, as part of the Homebush Precinct is strategically positioned to accommodate significant renewal as anticipated under *A Plan for Growing Sydney*.

In November 2016, the Greater Sydney Commission (GSC) released *Towards Our Greater Sydney 2056*, which provided an draft outline of the proposed amendments to *A Plan for Growing Sydney* foreshadowing the comprehensive review of the metropolitan plan in 2017.

Draft Central District Plan

In November 2016, the Greater Sydney Commission (GSC) released the draft District Plans for the Greater Sydney Metropolitan Region for public exhibition and review. The draft District Plans will fill the gap between the metropolitan plan and Council's Local Environmental Plans giving effect to the metropolitan goals and planning priorities from *A Plan for Growing Sydney* by setting out priorities and actions for each of the six Sydney Districts.

The Central District, in which the Site is located, forms part of the established *Eastern City*. However, the Site is located at the junction of the Central District and West Central District. Arguably, the Site is positioned to capitalise on the priorities of the District and align itself with the strategic direction of the wider area. Facilitating higher density development would align with the District Priorities in that development would:

- Improve housing design and diversity;
- Create a vibrant and active centre;
- Improve access;
- Accommodate increased density near public transport routes, jobs and local amenity; and
- Protect the environment and enhance sustainability.

Sydney Olympic Park Master Plan 2030

Sydney Olympic Park (SOP) is a dynamic suburb, which over the past 17 years has evolved to meet the changing demands of its community whilst respecting its Olympic and Paralympic heritage. The revised *Sydney Olympic Park Master Plan 2030* and the concurrent *State Environmental Planning Policy (State Significant Precincts) 2005* will deliver an additional 9,500 residents, 4,700 homes, and 2,500 jobs. The Plan recognises and promotes the future role of SOP within the Greater Parramatta Priority Growth Area (refer to **Figure 2**) and the Sydney metropolitan area.

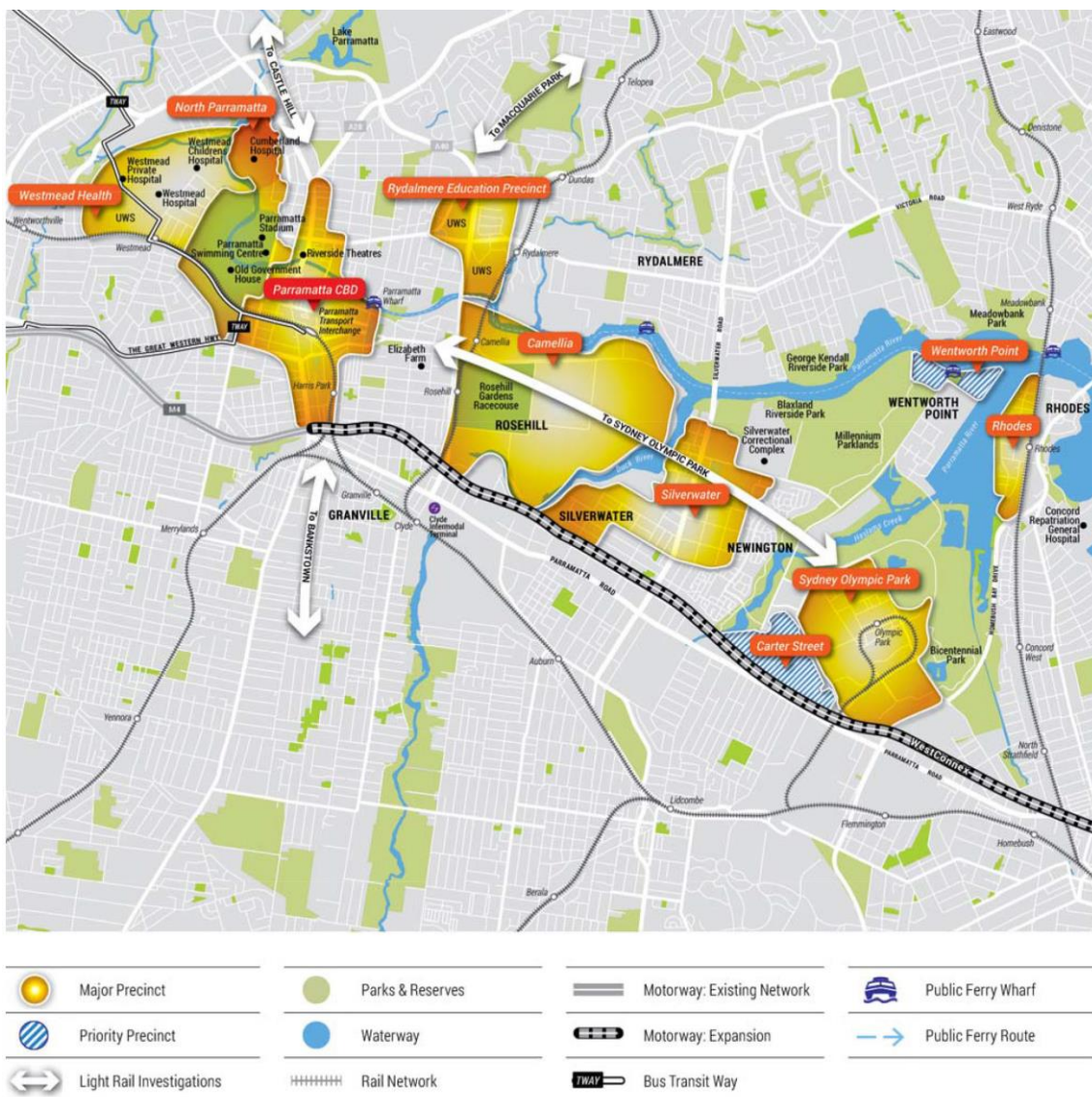


Figure 2 – Greater Parramatta Priority Growth Area
 Source: Department of Planning and Environment

The Site is located on the eastern edge of SOP. As such, it is strategically located to benefit from the provision of open space, recreation and leisure activities as well as employment within the Park. Additionally, development of the Homebush Precinct, including the Site, presents the opportunity to create a consistent development language across the area, with Homebush Precinct acting as the eastern gateway to the Greater Parramatta Area.

3.2 Site Opportunities

Notably, the Site is characterised by its:

- Proximity to public transport options including four heavy rail train stations, being North Strathfield, Concord West, Strathfield and Homebush, and multiple bus routes;
- Proximity and connectivity to employment precincts including Parramatta CBD, Sydney CBD, Rhodes and Macquarie Park;
- Proximity to the metropolitan road network including WestConnex, Parramatta Road, and Homebush Bay Drive/A3;
- Proximity to cultural and recreation amenities and open space including Sydney Olympic Park (Millennial Park) and Bicentennial Park; and
- Proximity to local amenities including the schools, childcare centres and the 'Bakehouse Quarter' which features office space, restaurants, cafes, supermarkets and speciality shops.

These characteristics have resulted in the Site and the surrounding area being earmarked for urban renewal and growth over the past two decades. As such, the Site is strategically placed to benefit from changing land uses and density in any Strategy or future rezoning pertaining to the area.

4.0 THE PARRAMATTA ROAD CORRIDOR URBAN TRANSFORMATION STRATEGY

4.1 Background

On 9 November 2016, the Minister for Planning in conjunction with UrbanGrowth NSW and the State Government finalised the *Parramatta Road Corridor Urban Transformation Strategy* (the Strategy). The Strategy outlines a long term vision for the transformation of the 20-kilometre Parramatta Road Corridor from Camperdown to Holroyd. The vision will be delivered through key principles identified below:

- Plan for a diversity in housing types to accommodate a wide range of community needs;
- Plan for and position the Corridor to attract new businesses and to support existing businesses to create a diversity of jobs and promote jobs closer to homes;
- Reshape and better connect places and associated movement networks to better serve customers and encourage sustainable travel;
- Promote quality places and built form outcomes to transform the Corridor over time;
- Embellish existing open space and provide for new active and passive open spaces;
- Create liveable, local Precincts along the Corridor that are sustainable, resilient and make Sydney a better place; and
- Deliver, drive, facilitate and monitor action.

As an integrated land use and transport plan, the Strategy will provide a coordinated framework across ten local government areas that will see a change in land uses and enhanced transport, key road infrastructure and open space to facilitate urban renewal throughout the corridor.

The key stages of the Strategy's development are outlined below.

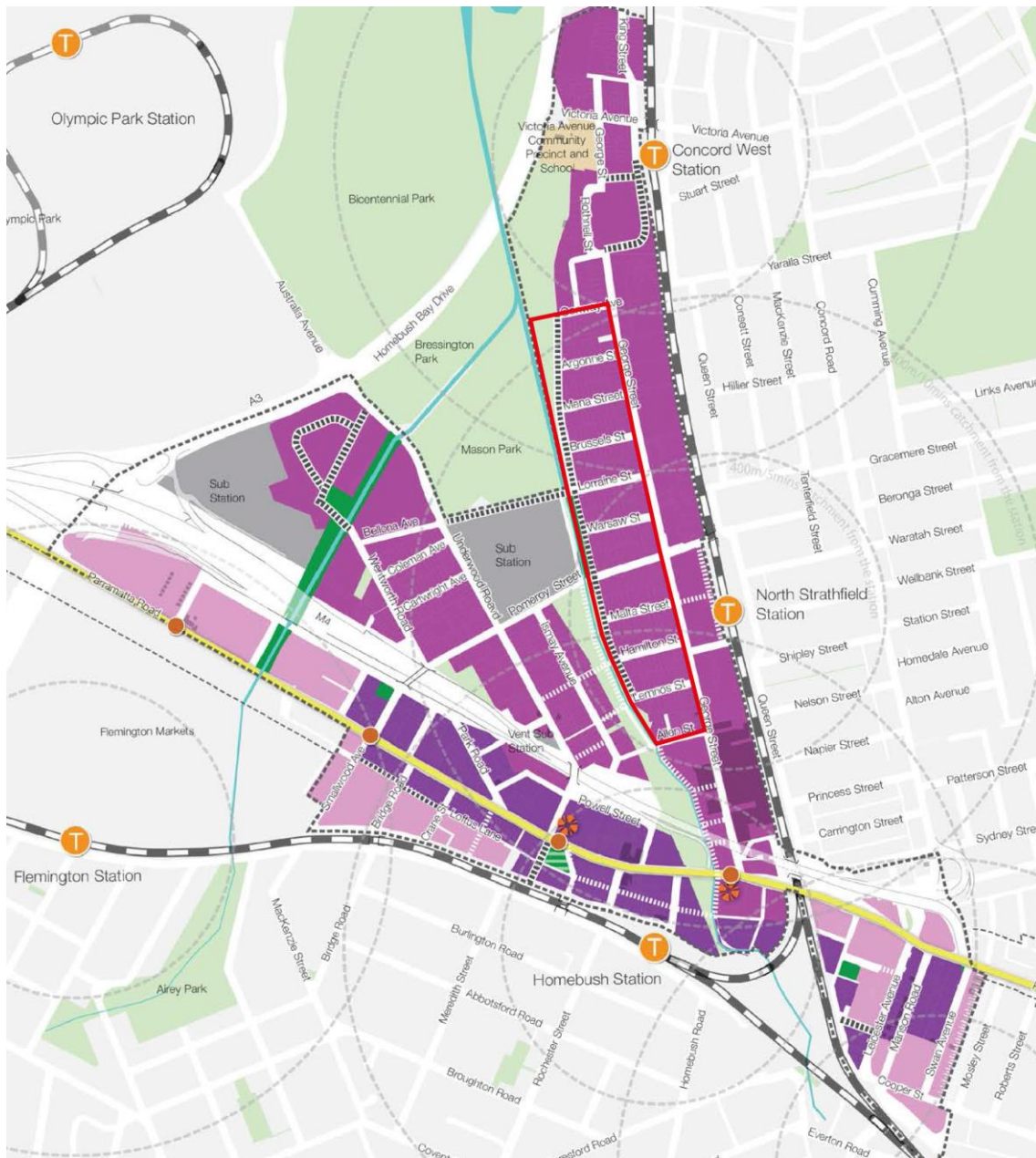
Late 2013	Community consultation began with a series of planning sessions attended by community representatives and other stakeholders.
Late 2014	The Preliminary <i>Parramatta Road Urban Transformation Strategy</i> was published for comment. Community feedback was sought to inform the progression of the Strategy.
17 September 2015	The draft <i>Parramatta Road Urban Transformation Strategy</i> (draft Strategy) was launched. The draft Strategy was developed in conjunction with State agencies and local councils.
September – December 2015	The draft Strategy was publicly exhibited between September 2015 and December 2015.
May 2016	Following the consultation period, the feedback was reviewed and analysed with a Consultation Outcomes Report released in May 2016.
May – November 2016	UrbanGrowth NSW in conjunction with other agencies and consultants undertook additional studies and analysis
9 November 2016	Final <i>Parramatta Road Corridor Urban Transformation Strategy</i> released by Government.
December 2016	Implementation of the Strategy including rezoning proposal commenced. The Strategy is implemented by way of a Section 117 Ministerial Direction.

4.2 Homebush Precinct

The Strategy is divided into two distinct sections; Corridor West and Corridor East and identifies eight precincts to accommodate a diversity of land uses and densities supported by a range of active and public uses. The Site is located in Corridor East, within the Homebush Precinct. Under the Strategy, the Precinct, which includes part of North Strathfield, will be transformed into an active and varied hub, blending higher density housing and a mix of different uses, all supported by a network of green links and open spaces. Under the Strategy it is envisaged that by 2050 the Homebush Precinct will be home to 19,500 people, 9,500 homes and 12,900 jobs.

The Draft Strategy – September 2015

The draft Strategy, published in September 2015, presented the opportunity for increased density throughout the Homebush Precinct, from Parramatta Road to Concord West Station and consequently the subject Site. The Plan proposed higher density residential development of an average of 8-storeys with a maximum 12-storeys (42 metres) for the Site (refer to **Figure 3** below).



- The Site
- Average 14 storeys - max 25 storeys (82m)
- Average 8 storeys - max 12 storeys (42m)
- Average 6 storeys - max 8 storeys (29m)

Figure 3 – Draft Strategy Built Form Plan
 Source: UrbanGrowth NSW/ JBA

Consultation Outcomes – May 2016

During the public exhibition of the draft Strategy submissions were made by residents, land and business owners and the City of Canada Bay Council and Strathfield Councils. The Consultation Outcomes Report for the Precinct summarized the following issues:

- The City of Canada Bay Council requested no rezoning north of Pomeroy Street until the City of Canada Bay Draft Concord West Precinct Master Plan 2014 was finalised. Development Controls and a Planning Proposal are currently being prepared for the Precinct;
- Strathfield Municipal Council recommended that density and height be based on proximity to rail corridors and/or other key transport nodes and expressed concern that many areas farthest from train stations were assigned the highest development densities;

- General concern about the increased population compounding existing congestion, particularly on George Street, Pomeroy Street, Underwood Road, Homebush Bay Drive and Australia Avenue; and
- While much of the community feedback opposed the proposed heights of development in the Precinct, particularly in areas adjacent to single storey residential dwellings, there was general community support for higher density development around train stations.

The Final Strategy – November 2016

The final *Parramatta Road Corridor Urban Transformation Strategy* was released 9 November 2016. Whilst the objectives of the Strategy remain consistent with the draft and increased density is achieved across most parts of the Homebush Precinct, the original recommended changes to the Site were not carried through to the Final Strategy. The Site would remain zoned R2 Low Density Residential with a maximum building height of 8.5 metres (refer to **Figure 4** below).

Figure 7.12: Homebush Recommended Land Uses

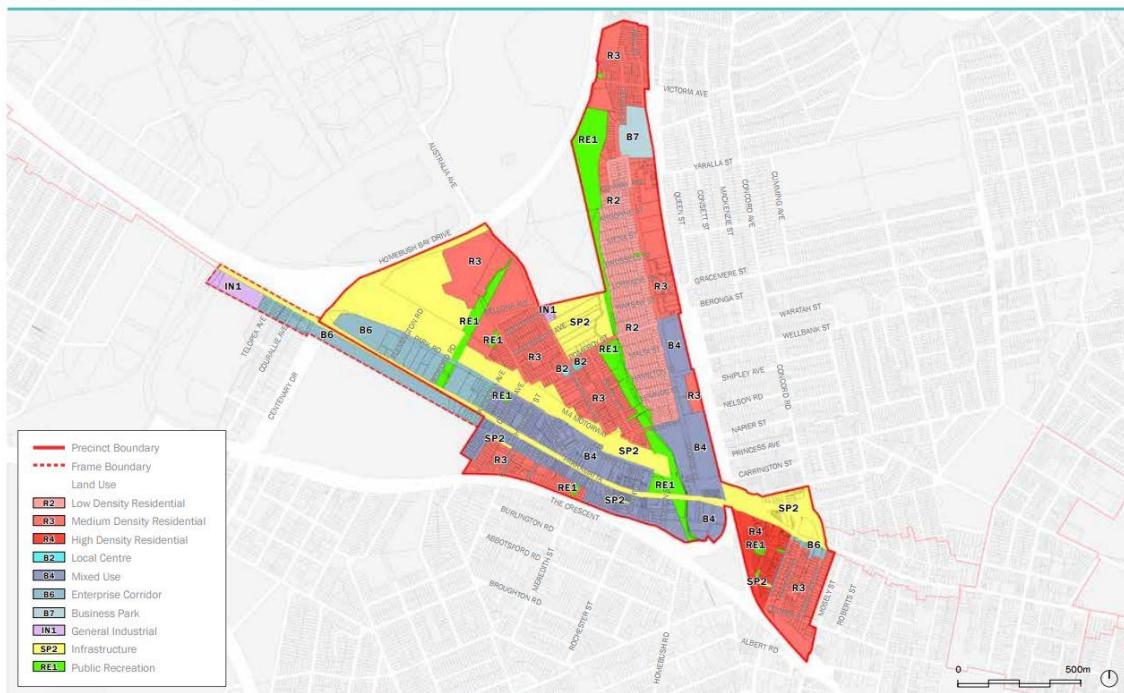


Figure 4 – Homebush Recommended Land Uses
 Source: UrbanGrowth NSW

Whilst UrbanGrowth acknowledges that the plans presented in the draft Strategy were of good planning logic (refer to **Attachment A**), they were responsive to some of the stakeholder feedback and modified their recommendation to align with the requests of a vocal and over represented minority. In this case, the modification resulted in no change to the controls affecting the Site under the Strategy. Other reasons given for retaining the current land use controls for the Site related to:

- Traffic and transport impacts;
- Character and amenity;
- Flooding and water management impacts; and
- Uncertainty surrounding the Parramatta Light Rail Alignment.

Following feedback received during the exhibition period and representations made by local Ministers, UrbanGrowth engaged specialists to undertake further analysis and studies of the North Strathfield area.

SJB and Godden Mackay Logan undertook further built form and heritage focused analysis. UrbanGrowth advised that these studies found that whilst the area is not listed as heritage conservation area, nor includes any listed heritage items, the whole area (including the Site) has

character which in its entirety should be considered for protection. Evidence of these findings is not documented in UrbanGrowth’s Reference Reports, including the Fine Grain Study dated November 2016.

In response to traffic concerns, Jacobs were also engaged to undertake traffic and transport analysis. The analysis found that major upgrade works would be required to support increased densities across the Precinct including a major road connection to the north. A lack of guaranteed future traffic and transport infrastructure, both public and road, is a constraint of the Precinct. As the Strategy aims to be an integrated land use and transport plan, it should be developed collaboratively with transport agencies across the board to ensure coordinated infrastructure and planning provision which envisions the overall future capacity of the Precinct to leverage off quantum densities and to avoid piecemeal infrastructure.

Parramatta Light Rail Alignment

During the preparation of the *Parramatta Road Corridor Urban Transformation Strategy* the Parramatta Light Rail Corridor has been an important consideration to promote urban renewal, jobs and housing along the corridor between Westmead, Parramatta, Carlingford, Sydney Olympic Park, and Strathfield.

Several options and alignments for the Parramatta Light Rail corridor have been proposed by the NSW Government, with a consistent vision to connect Sydney Olympic Park and Strathfield Railway Station through the Homebush Precinct.

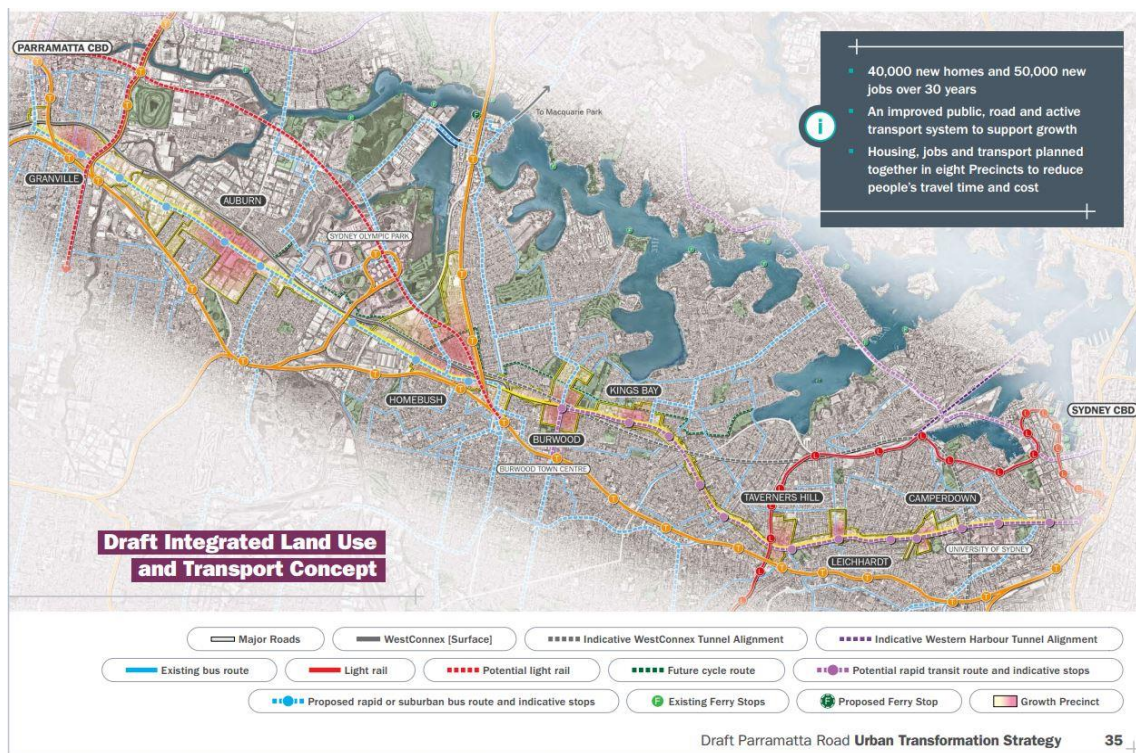


Figure 5 – Draft Integrated Land Use and Transport Concept
 Source: UrbanGrowth NSW

In late 2015, the NSW Government unveiled a 22-kilometre indicative route for the project. As identified in the Draft Strategy, the indicative Light Rail plan identified the Light Rail alignment to run to the west of the Site, between Sydney Olympic Park and Strathfield (refer to **Figure 6**).

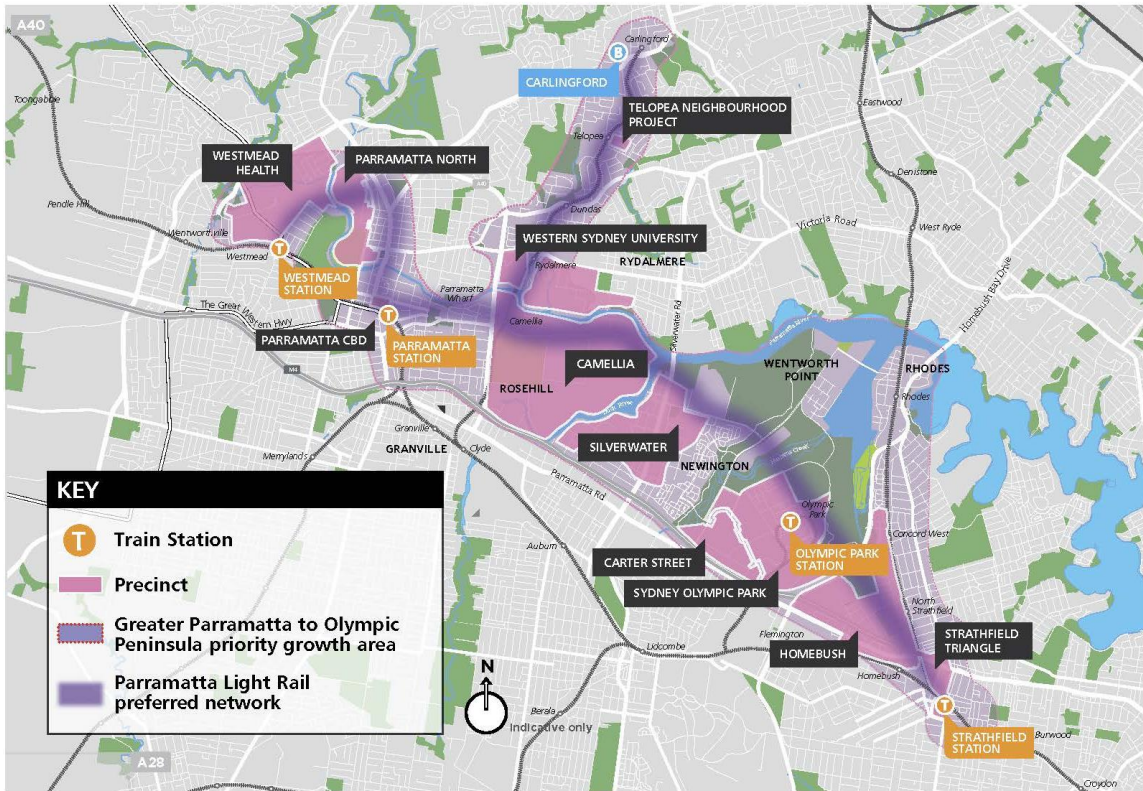


Figure 6 – Parramatta Light Rail Indicative Route 2015
 Source: TfNSW

On 17 February 2017, following stakeholder consultation, the NSW Government announced Stage 1 of the Light Rail project; 12-kilometres with 16 stops between Westmead Hospital, Parramatta and up to Carlingford (refer to **Figure 7**). Stage 1 will be complete by 2023. Olympic Park and Strathfield have not been named in the first stage of the project but rather will come later in Stage 2. Planning work for Stage 2 of the project, from Camellia to Strathfield via Olympic Park, is being developed in collaboration with Sydney Metro West. Stage 2 planning work is expected to be finalised by the end of 2017.

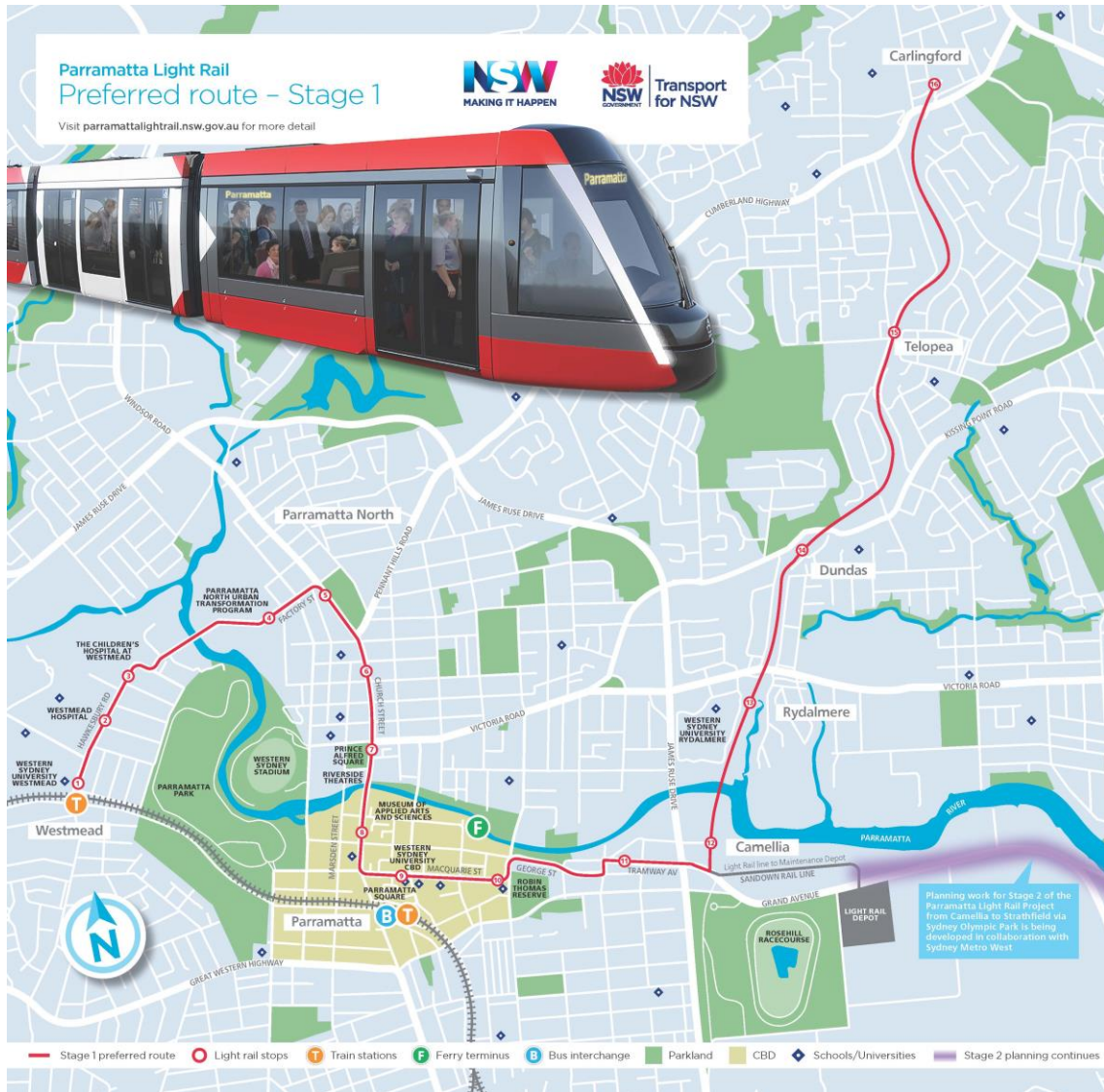


Figure 7 – Parramatta Light Rail Stage 1
 Source: TfNSW

It is understood that during consultation with UrbanGrowth, TfNSW requested that the draft Strategy move away from the alignment previously shown in the indicative Light Rail plan (refer to Figures 5 and 6) until a preferred route through to Strathfield had been confirmed (refer to Attachment A). During consultation with representatives of the Residents Group, UrbanGrowth acknowledged that if the preferred route is resolved and runs through the Homebush Precinct, the Strategy would be revisited. As this is unlikely in the short-term given the recent announcement of Stage 1 of the Light Rail project, and given such uncertainty about the alignment it did not preclude other areas within the Precinct from being rezoned (including along Underwood Road), it is not clear how this would have had a greater impact upon the Site relative to other sites, particularly recognising the broad-brush nature of the corridor identified in the Parramatta Light Rail Indicative Route 2015 (refer to Figure 6). Should the Proposed Light Rail eventuate along the indicative alignment indicated above, this should only be considered an additional potential future benefit to the Site. Whether the light rail happens or not, the area is well serviced by existing heavy rail and potential new Metro rail to Parramatta will further enhance accessibility.

4.3 Implementation of the Strategy

The *Parramatta Road Corridor Urban Transformation Strategy* has a 30-year outlook. To effectively work towards the success of the Strategy over the long-term, the Implementation Tool Kit including the Implementation Plan 2016-2023 has been developed to provide a framework for development. The Implementation Plan 2016-2023 is supported by a Section 117 Ministerial Direction, and as such has statutory force requiring land use and development in the Corridor to be consistent with Strategy. Proposals that are inconsistent are unlikely to be supported.

The planning pathways to implement the recommended land uses and development controls identified within the Strategy and Implementation Plan 2016-2023 include:

- LEP Gateway Process – proponent led planning proposals or council led amendments to local environment plans.
- Priority Precinct Process – Department of Planning and Environment (DPE) led rezoning under the established Priority Precinct Program.

Under the Strategy, the Site is not recommended for a change in zoning and as such, amendments to the planning controls to achieve higher density development would be inconsistent with the Strategy and therefore unlikely to be supported. Given the significant upfront investment required and inconsistency with the Strategy, pursuit of a proponent led planning proposal for the Site is unviable.

In addition, the Out of Sequence Checklist, a merit assessment process for proposals that depart from the staging and sequencing identified by the Implementation Plan does not apply to the Site. As outlined in the Strategy, “the Out of Sequence Checklist is not a mechanism to proceed with development in the Corridor that is inconsistent with the Strategy”, and is not therefore an applicable pathway for redevelopment of the Site.

Council-led Precinct Planning

Implementation of the Strategy via the LEP Gateway Process will arguably result in the lodgement of Site-specific proponent led planning proposals seeking “spot re-zonings” along the Corridor. It is understood that the adoption of a Site-by-Site approach to the rezoning of the Corridor raises concerns for Council, including ad-hoc planning outcomes, difficulty in addressing the cumulative impacts of development and coordinating infrastructure provision and a lack of Council resources.

In response, Council is pursuing a precinct wide approach to the redevelopment of the Homebush Precinct, with the potential to nominate the Precinct with the DPE as a Priority Precinct. It is understood General Managers and Council Officers from Canada Bay Council, Strathfield Council and Burwood Council have met to discuss opportunities to streamline planning processes, reduce the duplication of work, and to ensure planning instruments are aligned across the Corridor and local government boundaries. This approach will enable development to occur in a coordinated manner. This approach is supported by the Landowners Group.

Development of precinct wide planning controls provides the opportunity for the outcomes of the Strategy to be revisited, including the Site. Given the limited viability of pursuing alternative planning pathways outlined above, support is sought from the Greater Sydney Commission and Canada Bay Council for the inclusion of the Site in Council led precinct plans. Representation has also been made to the Hon Craig Laundry, MP, and Maria Atkinson, District Commissioner (Central) to this effect.

4.4 Community Concerns

Despite the reported opposition to the draft Strategy, the Site's exclusion from a change in zoning under the Strategy has caused significant concern amongst North Strathfield landowners and residents. Key concerns include:

- That the Site will become an island surrounded by high density development; and
- The logic for excluding the Site from the Strategy given its proximity to North Strathfield and Concord West Railway Stations and commercial and retail services and schools along George Street, comparative to other sites which are further away from public transport and infrastructure yet were up-zoned.
- Prolonged unease and uncertainty about the future of residents' properties;
- Landowners reluctant to invest in maintenance and redevelopment of their properties and therefore an overall decline in the character and aesthetic of the area;
- Significant upfront time and cost to pursue a proponent led rezoning on land which is currently not supported by the Strategy;

The Strategy was initially proposed over three years ago, however the area has been subject to previous investigations including the 'Strathfield to Rhodes Corridor' Strategy prepared by Concord Council over 20 years ago. Since initial exhibition of the draft Strategy in 2014 residents of North Strathfield have been adjusting to the imminent changes to their community; changes to both neighbouring properties as well as wider suburb area. Constant uncertainty is stressful for residents and makes it difficult for residents to make appropriate decisions about the future of their properties and lives.

Whilst the Site has been recognised as having perceived "character", many of the existing dwellings and the patterns of subdivision are comparable to those areas proposed for R3 and R4 rezoning. As it is not clear why the area to the west of Powells Creek and Underwood Road in Homebush, which arguably presents similar architectural and built form characteristics as the Site yet is further away from North Strathfield and Concord West Railway Stations, has been proposed to be rezoned, recognising the different jurisdictions and views of Canada Bay and Strathfield Councils, it is possible that inconsistency in the application of the Strategy's recommendations may result in future impacts to the perceived character. Recognising that considerable investment would be required to maintain the dwellings and their character over time, with such uncertainty about the future of their properties, landowners are reluctant to invest. A lack of investment will no doubt have a cumulative impact to the perceived character of the Site over time.

4.5 Future Conditions for North Strathfield Residents

In the instance that the Site retains its zoning and the areas surrounding it are redeveloped in accordance with the *Parramatta Road Corridor Urban Transformation Strategy*, the Site will become an island of low density development surrounded by high density development. The Precinct will function with an inverse logic where low density housing is located closest to public transport and services, and the greatest densities will be located on the edges of the Precinct. Those living on the western side of Powells Creek and beyond 1 kilometre from the railway stations, will likely utilize additional modes of transport including vehicle or bus, to access the railway stations and services, further increasing pressure on Pomeroy and George Streets.

4.6 Overwhelming Community Support for a Rezoning

Despite reported opposition to the draft *Parramatta Road Urban Transformation Strategy* and contrary to the position adopted by UrbanGrowth, the community from Allen Street to Conway Avenue are strongly in favour of an amendment to existing planning controls to facilitate higher density development. Since the initial exhibition of the draft Strategy over three years ago, residents have adjusted to the prospect of change and revitalisation of the suburb. As outlined above, residents face becoming an 'island' amongst higher density development. Residents wish to avoid continued uncertainty on the future of their properties by being included in Council-led precinct planning for the area.

The residents have spent a considerable amount of time advocating for the inclusion of the Site in the Strategy and the short-term Implementation Plan 2016-2023, and through this submission, petition the Greater Sydney Commission (GSC) to encourage and support Council-led LEP amendments or Precinct Planning to rezone the Site.

5.0 CONCLUSIONS

Having regard to the priorities of the draft District Plan and the Strategy, there are compelling planning arguments to support the inclusion of the Site within local precinct planning and Council-led LEP amendments in the short term. These include:

- Alignment of the priorities of the Plan and the Strategy;
- Consistency with the priorities of the *Towards our Greater Sydney 2056* and the *draft Central District Plan*;
- Consistency with the principles of the *Parramatta Road Corridor Urban Transformation Strategy*;
- Proximity of the Site within 300-800m of North Strathfield and Concord West railway stations and the possibility to create compact, walkable, pedestrian-oriented development;
- The Site's closer proximity to public transport than other sites proposed to be rezoned;
- The Site's closer proximity to the North Strathfield Bakehouse Quarter including retail, commercial and school precinct, than other sites proposed to be rezoned;
- The proximity of the Site to Sydney Olympic Park and significant regional open space and recreation opportunities and the benefits of locating density adjacent amenity;
- The central proximity of the Site to employment precincts including Parramatta CBD, Sydney CBD, Rhodes and Macquarie Park;
- The Site's proximity to already existing high density housing typologies along George Street and the opportunity to create more compatible development;
- The Site is not within a heritage conservation area and the perceived character is comparable to the blocks to the west of Powells Creek and the block bounded by Underwood Road, Pomeroy Street, Wentworth Road South and Bellona Avenue which are to be up-zoned;
- Recognising that over time the residents have become more open to the prospect of change and the revitalisation of the suburb and the community is supportive of a change in zoning to provide certainty to the future of their properties;
- Having regard to the broader urban structuring elements and the patterns of development in the locality, in particular Rhodes which is also bound by the railway corridor to the east and constrained to the west. The north-south linear patterns evident in Rhodes are of a similar nature to North Strathfield; and,
- The extent of change proposed around the Site is so significant that the transformation of the precinct will detract from the perceived existing character and amenity that was identified as a reason for retaining it.

6.0 RECOMMENDATION

Considering the above, it is recommended that the Greater Sydney Commission (GSC) review the context and planning framework of the Site and that it be considered for inclusion within Council-led local planning amendments in the short term to permit higher density residential development. This will facilitate renewal of the entire Precinct in a more holistic and coherent manner and better promote the desired future outcomes of the corridor and facilitate holistic infrastructure provision. It will also ensure consistency with Greater Sydney planning objectives and align with infrastructure and transport priorities. Ultimately this will also alleviate uncertainty for residents and the long-term viability of their neighbourhood.

We recognise the important collaborative role and function of the Greater Sydney Commission (GSC) in working with the City of Canada Bay and Strathfield Councils in forward planning for the Homebush Precinct, and we recommend that together, a review of the recommendations of the Strategy be undertaken in relation to the proposed planning controls pertaining to the Site.

Should you have any queries about this matter, please do not hesitate to contact me on (02) 9956 6962 or kvanderzanden@jbaurban.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Kelly Van der Zanden', is centered within a light gray rectangular box.

Kelly Van der Zanden
Associate