



24.11.2017

Department of Planning and Environment

Sent via online portal

Dear Sir/ Madam,

Re: Formal Representation on the Telopea Precinct Proposal

Further to our submission on the Telopea Masterplan prepared by Land and Housing Corporation (LAHC) in September 2016. Hume has again formally instructed David Lock Associates (DLA) to provide their expertise to inform Hume's representations in relation to the Telopea Precinct Proposal which incorporates the LAHC Masterplan for Telopea.

Hume are a major stakeholder in the area with 152 units and 244 tenants across three buildings at No. 15 Sturt Street and No's 1 and 3 Shortland Street, located within the Stage 1 Masterplan area. Hume offer a variety of property, tenancy and community development services in the area and therefore have a significant presence and in-depth understanding of the issues and opportunities for Telopea. Hume undertake regular customer surveys, with our latest survey being undertaken in October and November 2017. Any relevant findings are included in this submission.

DLA also ran a workshop with Hume staff from a variety of departments within the organisation, a number of whom work on-the-ground in Telopea. The outcomes of the workshop inform this response.

Firstly, we would like to reiterate that we support the intended outcomes of the masterplan and this subsequent precinct proposal which set out to achieve:

- Better connectivity;
- Creating a more balanced community;
- Additional density and height around the station and ridgeline;
- Opportunities for increased community facilities;
- Retention and improvement of existing open space;
- Attempts to overcome the topography of the area and improve accessibility; and
- Higher density around transport and services transitioning to lower rise communities.

The precinct proposal provides greater detail around the proposed built form outcomes within stage one (Telopea Masterplan by LAHC) and provides some detail on the delivery and implementation which was missing from the Masterplan when put to consultation in September 2016.

However, we still feel that the document is missing detail in relation to key issues outlined in the headings on the following pages.





Social and Affordable Housing Targets

The proposal does not provide housing targets for the precinct. It is not clear how many additional dwellings the rezoning could achieve. Without an indication of projected dwelling numbers, it is also not possible to understand the social and affordable housing targets for the precinct. Although the proposal discusses various infrastructure delivery mechanisms it is not clear how the precinct would achieve social and affordable housing, particularly in private developments. There is no mention of the incentives to encourage the delivery of affordable housing although such incentives are proposed within the document to deliver non-residential development in specific areas (discussed in further detail below). There is no discussion around if there is a specific social and affordable housing target as suggested in the District Plans or whether inclusionary zoning has been considered. We believe it is imperative to have these matters included as part of any planning proposal to be considered by the DoPE to ensure that the goal of creating *“a new and vibrant neighbourhood which includes more social and affordable housing”* is achieved.

Essential Infrastructure Delivery

The document details that an Interim Land Use and Infrastructure Implementation Plan (LUIIP) for the Greater Parramatta Priority Growth Area (PGA) has been developed by the DoPE in collaboration with City of Parramatta and Greater Sydney Commission (GSC). The primary purpose of the interim plan is to develop a land use framework to guide the future redevelopment of the growth area and to identify and plan for the infrastructure required to unlock its potential. This document needs to show a commitment to provide essential infrastructure either before or at the time that the residential developments are being constructed. In particular we would like to understand the method that will be used to equitably share the delivery of the essential infrastructure between landowners/developers within the precinct area.

Precinct Support Scheme Funding

The NSW State Government has allocated approximately \$5 million in Precinct Support Scheme funding towards upgrading local infrastructure – such as parks and streetscapes - in the Telopea precinct to directly benefit the community. Hume would like to understand how the DoPE as well as Council are going to determine what infrastructure is to be provided. Hume and their tenants would want to be engaged in the process to ensure that the infrastructure upgrades most important to current tenants is achieved as well as planning for future residents.

Non-Residential Development

The Telopea Masterplan stated that further community facilities are required (page 46-47) and retail and community facilities are shown on page 62 and 66-68. However, the precinct proposal is very soft about this. The Vision states: “A new retail centre *could* be provided ..., which *could* provide a range of services including local shops, supermarket and new community facilities. With the type of density proposed we do not feel that the proposal needs to incentivise the provision of commercial and community services.



The zoning proposed should require such services. If 20 storeys is the right maximum height, then providing commercial space shouldn't justify more. There's more than enough uplift in the proposal without having to incentivise community benefits. We feel that there should be the provision of a child care health, and health and wellbeing center which would assist in links to employment for existing and future social and affordable housing customers. Hume's previous research shows the need for this specifically in Telopea to enable employment opportunities and meet the strategic objectives in the Future Directions strategy. There are two documents that reference that the Council child care centres are at capacity, with a waiting list and require further structural upgrades:

1. PCC - Planning social infrastructure needs for the community of Telopea – A guide for FACS. August 2015
2. PCC - Draft social infrastructure strategy – August 2017

The proposal states that a retail and commercial market analysis is to be commissioned. As such is the proposed zoning premature? We feel that with proper analysis a different zoning might be more appropriate. The proposed B4 mixed use zoning as defined in the Parramatta LEP would allow a residential flat building in these key locations. There is no statutory requirement for developments to provide non-residential on the ground and podium level. We feel that the land currently zoned B4, particularly the land directly adjacent to the train station should be changed to B2 – Local Centre. This would ensure that the only residential development on the site would be above non-residential uses. We feel that this is critical to enable Telopea to develop its own economy and encourage residents to not only live in the area but spend their leisure time and money in the area to reduce "leakage" to surrounding areas (discussed further below).

Relationship between the proposed height and FSR

It is not clear if the proposal has been supported by a built form study which demonstrates the relationship between the proposed FSRs and heights. As per the Apartment Design Guidelines (ADG), there needs to be a careful study to ensure the proposed controls (particularly FSR and heights) are coordinated and whether the testing has included the incentives.

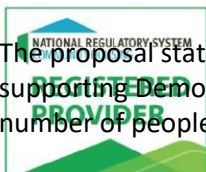
Sustainability

Similarly, there is no commitment to sustainability targets for the proposal and defers this to future studies. We feel that the document should outline key targets which would allow for greater transparency from vision and objectives to planning and delivery.

Car Parking

Hume's tenant survey shows that lack of on street car parking is a major issue in the area, in particular in Shortland Street where the majority of the higher density development is proposed within the precinct.

The proposal states that a larger proportion of the population do not own cars in Telopea. However, the supporting Demographic Report prepared in March 2017 does not support that claim showing that a similar number of people travel to work in a car as that in Parramatta LGA and Sydney. Although we support a





reduction in car parking requirements particularly in sustainable locations, the proposal needs to acknowledge current issues and ensure that there is provision for these within the proposed design in particular as the GTA

Traffic Report noted that car parking demand closer to the train station would increase. The proposal should include suggestions around car parking for the train station and the wider area within the proposal.

The Precinct Vision

As a group we previously reviewed the Masterplan objectives, which are similar to the precinct vision. We have utilised the existing headings and expanded upon and created our own vision which encompass what is important to Hume as an organisation and also to their customers.

As well as the key headings of Land Use, Built Form and Building Types, Public Open Space, Transport Access and Movement etc we also believe that the Masterplan should focus on the potential to develop the economy of Telopea, as mentioned above. Our vision is outlined under the headings below:

Economy

- For CHPs such as Hume to lead the way in the redevelopment of the area by offering exemplar services to maximise the profitability of private developer investments in the area.
- For CHP's to work with developers at the early stages to agree the best type of social and affordable housing in the area.
- To encourage residents to not only live in the area but spend their leisure time and money in the area to reduce "leakage" to surrounding areas.
- To recognise that the level of social housing tenancies will have an impact on the economics of the area, and ensure sustainable, affordable services including leisure and education are readily available locally.
- To listen to local residents' opinion on the type of non-residential uses they want in the area to ensure that they are utilised when on the ground (48% of households find local groceries not affordable - many customers complain IGA is very expensive and travel to Aldi which is located in Rydalmere).

Community

- To seamlessly integrate tenure types, ownership types, and other facilities.
- To ensure equitable access to all services for all users in Telopea.
- To cater for the needs of the existing population as well as the proposed population.
- To improve and "design-in" safety.
- To reduce the stigma associated with Telopea.





- To facilitate social interaction.

Land Use

- To include inclusionary zoning as a means to ensure a minimum level of affordable and social housing across all development sites within the Masterplan area.
- To stimulate the local economy through:
 - Creation of local businesses;
 - Creation of local employment opportunities;
 - Provision of the necessary local services;
 - Provision of improved and additional education facilities.

This should be provided through rezoning the land to B2 – Local centre in key locations and other incentives.
- To create linkages/ partnerships with other services and facilities in the wider region e.g. Western Sydney University and TAFE etc.
- To create and improve infrastructure around education and other supporting facilities.

Built Form

- To ensure that the developments built form and scale is complementary to all other objectives.
- To create a human scale of development and encourages social interaction.
- To facilitate integration (tenure should not be identifiable through design).
- To allow adequate access to light.
- To not overshadow public open spaces or existing buildings and private open spaces that will be retained.
- To ensure seamlessly integrated design throughout the masterplan site so as not to create a “top and bottom end”.

Movement

- To ensure better accessibility for all (the incentives to create better pedestrian linkages is commended).
- To respond appropriately to the topography – ensure accessibility measures are available 24/7.
- To improve intermodal connections by better scheduling and increased provision of services.

To improve the environment for walking and cycling (64% of existing residents would like to see bike paths in Telopea and 84% improved walking paths), and make active transport and public transport the preferred modes of transport.





- To increase and improve the amenity and safety of the pedestrian realm.

Open Space

- To improve existing facilities within existing open spaces (67% of Hume's Telopea tenants state that children's playgrounds are important to them, 61% would like outdoor fitness equipment, 58% would like sporting fields, and 42% sporting courts).
- To create inviting useable places.
- Integrate more pocket parks to support the higher density development.
- To improve linkages between the various open spaces.
- To create places for people to gather – we support the inclusion of more open space as part of the entry plaza to the light rail which could create - The Village Square.
- Provide a variety of open spaces for meeting, playing, growing, learning, etc.
- To improve safety through better lighting, etc.
- Enhance and retain the existing natural features.

The Opportunities

The following section identifies some of our preferred outcomes for Telopea based upon the vision's identified above and our understanding of the place.

Hume's Vision is to create vibrant, sustainable, and cohesive communities through the provision of outstanding homes and equitable services. The following are potential design ideas and initiatives in support of, and to enhance, the future development and amendments to the precinct proposal. We believe there are a number of opportunities that have been overlooked by the proposal in addition to the key ones outlined above. These have been grouped using the same headings as the objectives:

Community

- Existing location of community facilities to remain with a new and enhanced open space/ town square.
- Investigate the demolition and reprovision of the existing school, which is considered an eyesore by the community.
- Consider the relocation of the school to the top of the hill, adjacent to the community services which could create a "Civic Quarter".
- Develop a new community facility – such as a recreation field at the location of the existing school site to encourage local sports teams to the area again.
- To improve facilities in the open spaces such as a coffee house in the park.





Land Use

- Encourage evening economy opportunities and greater activity near the station through initiatives such as an eatery precinct which could embrace the multicultural nature of the area – this should be facilitated through the use of the B2 – Local Centre zoning.
- Undertake assessment of other Government land within the masterplan area (i.e. NSW Education land) to ascertain best locations for facilities from urban design/ masterplan perspective and potentially consider ” land swaps” to improve the overall design and accessibility of the masterplan.
- Increase recreational uses.
- Creation of child care centre and leisure facilities.
- Create opportunities for health facilities such as a medical centre or anti-natal clinic etc.
- Deliver a variety of housing types to cater for the existing residents that will be rehoused but may want to move back into similar size and type of property.
- Encourage the provision of aged care.
- Seek opportunities to encourage educational services who have expanded across the Parramatta LGA to have specific services within the area, i.e. outreach campus etc.

Built Form

- Create multi-functional buildings near the station which includes:
 - Light rail retail on ground floor;
 - Commercial on ground, first, and second floors (not just on the ground);
 - Residential third floor and above;
 - Communal green roof spaces;
 - Biodiverse roofs where community access is not feasible;
 - Community gardens;
 - Vertical gardens; and
 - Maximise sustainability features such as solar water heating, PV, and other measures which reduce both environmental impact and utilities costs for tenants.
- To ensure that that amenity is not compromised by built form massing and height.
- Adhere to the use of SEPP 65 standards and other best practice (to ensure that internal amenity is not compromised).
- Set best practice standards for energy and water efficiency of buildings.
- Develop design guidance to ensure a consistent character and unique sense of place for Telopea.





Movement

- Create a series of places/ activities/ uses that are accessible to all, on the journey from the station to the open spaces to the south (and vice versa).
- Improve the existing road and pedestrian infrastructure (which has not been suggested in the masterplan).
- Encourage cycling, walking and public transport patronage through the increased provision of infrastructure but also through education.

Open Space

- Provide a mix of passive and active open spaces in the town square/ civic quarter.
- Create a circuit of open spaces and activity by linking the green spaces.
- Re-establishing recreational sports facilities.
- Enhance and retain the natural features including the mature trees, riparian corridor, etc.

The Delivery of the Precinct Proposal

At the masterplan stage we outlined a number of observations and questions in relation to the delivery of the masterplan. The following points are still unclear:

- DLA and Hume would like an opportunity to comment on the delivery and phasing strategy once developed.
- Has the impact of the necessity of pre sales and meeting finance pre conditions been considered in relation to the staging and delivery of affordable and social housing as well as the other community services?
- Will social and affordable housing be delivered at same time?
- What will determine the size of replacement social housing (one, two, or three bedroom)?
- Clarification on the rehousing strategy should be provided.
- Rehousing could impact the school with 80% of students from the existing social housing.
- Will local CHPs such as Hume have an opportunity to purchase land from LAHC?
- Is there further detail on costing/viability/land values/infrastructure funding?
- Why hasn't the precinct plan considered other FSR and height incentives to encourage greater non-residential development, social and affordable housing, sustainability etc?
- Can the existing road infrastructure absorb the additional demand? Particular concern with Manson Street (would this be upgraded?).





- What type of commercial and retail is envisaged - open streets or mall style retail development? The notion of developing a town centre should be more of a commitment not a “should” or “potential”.
- Will commercial/social service needs analysis be undertaken?

We hope the above are considered as part of the ongoing refinement of precinct proposal. We would welcome the opportunity to participate in all future public consultation and discussion around the masterplan.

Again we take this opportunity to reiterate Hume’s commitment to the Telopea precinct. Hume has significantly invested in this area and has a responsibility to our current Telopea residents to represent their views. Also as an owner of 152 units of which a multimillion debt facility has been leveraged Hume has a significant commercial interest in Telopea future plans and would welcome a greater involvement with LAHC through this process.

If you require any clarification or wish to discuss in detail we would be happy to meet.

We look forward to hearing from you.

Yours sincerely,



Nicola Lemon
CEO
Hume Community Housing

With input from David Locke and Associates





1/119 The Crescent, Fairfield NSW 2165

02 9722 4300

www.humecha.com.au

hume@humecha.com.au

