

4 ENVIRONMENT AND PLANNING DIRECTORATE REPORTS

ITEM 4.1 SUBMISSION TO DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE - HOMEBUSH TRANSPORT ORIENTED DEVELOPMENT (TOD) REZONING SUBMISSION

Reporting Manager Manager Strategic Planning

- Attachments:
1. DRAFT Submission - Homebush TOD - City of Canada Bay Council [↓](#)
 2. Explanation of Intended Effect - Homebush TOD Rezoning Proposal
 3. Design Guide
 4. Urban Design Report
 5. Independent Traffic Review - Bitzios
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RECOMMENDATION OF DIRECTOR ENVIRONMENT AND PLANNING

That:

1. The draft submission, provided at [Attachment 1](#), on the Homebush Transport Oriented Development (TOD) Precinct be endorsed for submission to the Department of Planning, Housing and Infrastructure.
 2. Approval be granted to the General Manager to make minor changes to the submission prior to sending to the Department of Planning, Housing and Infrastructure.
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PURPOSE

To seek Council endorsement of the draft submission on the Homebush Transport Oriented Development Precinct at Attachment 1 of this report.

EXECUTIVE SUMMARY

A Rezoning Review package for the Homebush Transport Oriented Development (TOD) Precinct (including an Explanation of Intended Effect) has been publicly exhibited by the Department of Planning, Housing and Infrastructure (DPHI) from 16 July to 16 August 2024 (Attachment 2).

This Proposal, if implemented, will have a significant impact on areas of Strathfield, North Strathfield and Concord West as a result of the introduction of high-density development to accommodate approximately 16,100 dwellings within the Homebush TOD precinct, with approximately 10,000 of these dwellings located within the Canada Bay LGA.

A draft submission has been prepared that outlines concerns regarding the Proposal in relation to strategic context, land use and urban design, infrastructure delivery, public domain and public open space, traffic and transport, flooding, heritage, and community/social infrastructure. This report highlights some of the key issues raised in the submission.

It is recommended that the draft submission be endorsed for submission to the DPHI.

STRATEGIC DIRECTION

This report supports Our Future 2036 outcome area:

Direction 3: Vibrant Urban Living

Goal VUL 1: Creative vibrant local village centres and community hubs

BACKGROUND/DISCUSSION

The Homebush TOD Precinct is the same as the area of the Stage 2 Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) for the Homebush Precinct, which encompasses both the City of Canada Bay and Strathfield LGAs. However, the Homebush TOD Precinct proposes significantly more development than was envisaged under PRCUTS. DPHI's Proposal for the Homebush TOD is intended to facilitate approximately 16,100 dwellings, versus 9,450 dwellings to 2050 by PRCUTS, for the whole Precinct (i.e. across Canada Bay and Strathfield LGAs)

DPHI announced the Homebush TOD as one of 8 accelerated TOD precincts across metropolitan Sydney in December 2023, with a highly accelerated timeframe for the preparation of the suite of planning documents for each precinct. These plans have been prepared by DPHI within a relatively short timeframe.

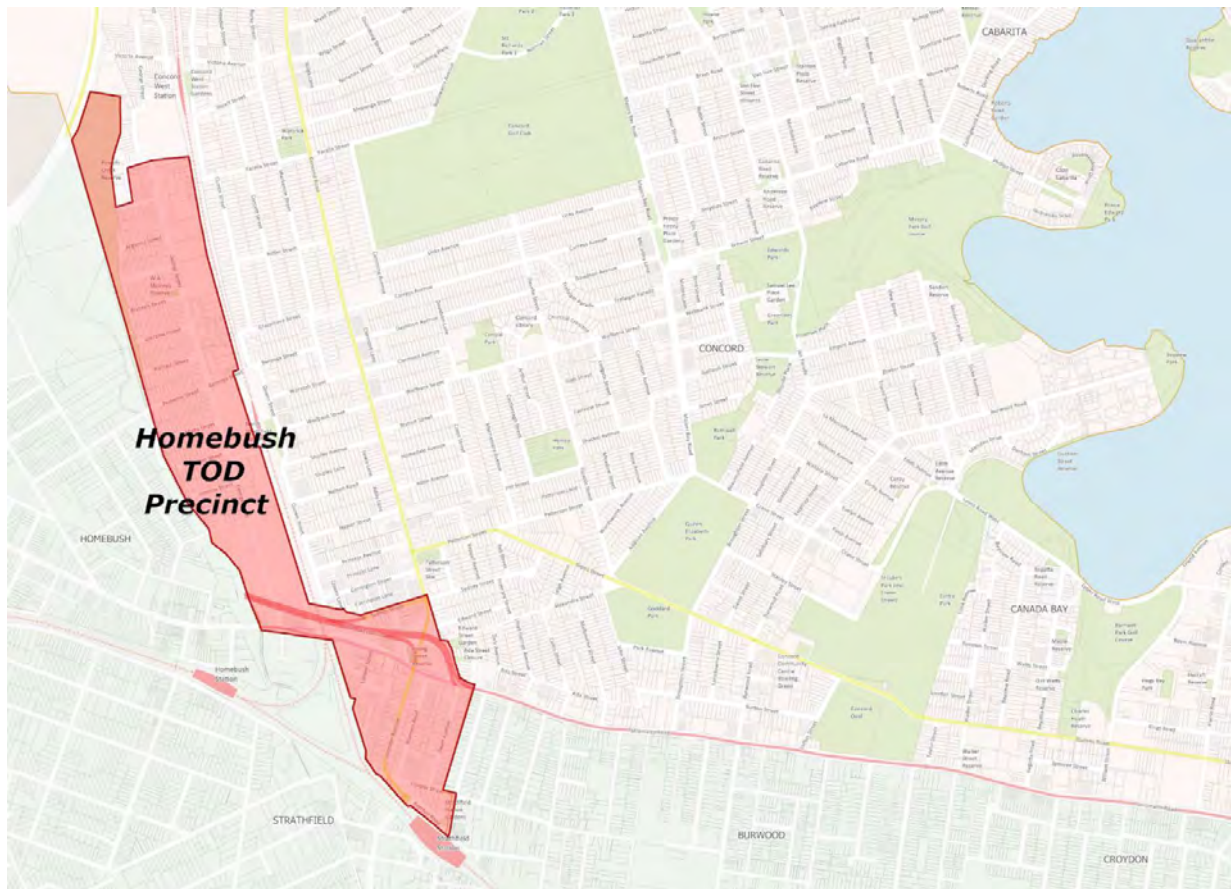


Figure 1: TOD precinct within City of Canada Bay (area to which the draft submission refers)

The TOD Rezoning Review package includes an Explanation of Intended Effect (which describes the proposed zoning and planning controls), a Design Guide (which will replace the Canada Bay DCP) and an Urban Design Report (Attachments 2-4).

SUBMISSION AND KEY ISSUES

A draft submission has been prepared and raises a range of issues relating to strategic context, land use and urban design, infrastructure delivery, public domain and public open space, traffic and transport, flooding, heritage, and community/social infrastructure. The draft submission was informed by advice from internal departments within Council, an Urban Design Review by Studio GL and a Traffic Review by Bitzios Consulting (Attachment 5).

This report provides an overview of the draft submission and highlights a number of issues and examples to illustrate some of the challenges with the proposal, including:

- a. Density and population
- b. School infrastructure
- c. Effective infrastructure delivery
- d. Scale and urban design
- e. Traffic and transport modelling
- f. Open space
- g. Flooding
- h. Inconsistencies
- i. Key principles and actions

a. Density and population

The draft submission (Attachment 1) notes that whilst Council is supportive of increasing density within the vicinity of high frequency public transport, changes to the planning framework should only occur where positive outcomes for the community will be delivered.

Under the State government’s accelerated TOD program, it is proposed to locate over 25% of all dwellings (approximately 16,100) identified across the 8 accelerated TODs within the Homebush TOD. Up to 16,100 new dwellings equates to approximately 40,000 people, and approximately 26,000 of these people would be located within the City of Canada Bay under this plan.

As illustrated in Figure 2 below, the City of Canada Bay has been highly proactive in its strategic planning around metro stations, as well as its implementation of the state government’s Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) and the Rhodes Place Strategy, which collectively will accommodate dwelling capacity for over 47,000 residents. Figure 2 also illustrates the anticipated population growth of approximately 35,000 in the surrounding areas of Sydney Olympic Park and in Burwood LGA south of the metro station adjacent to Concord Oval.

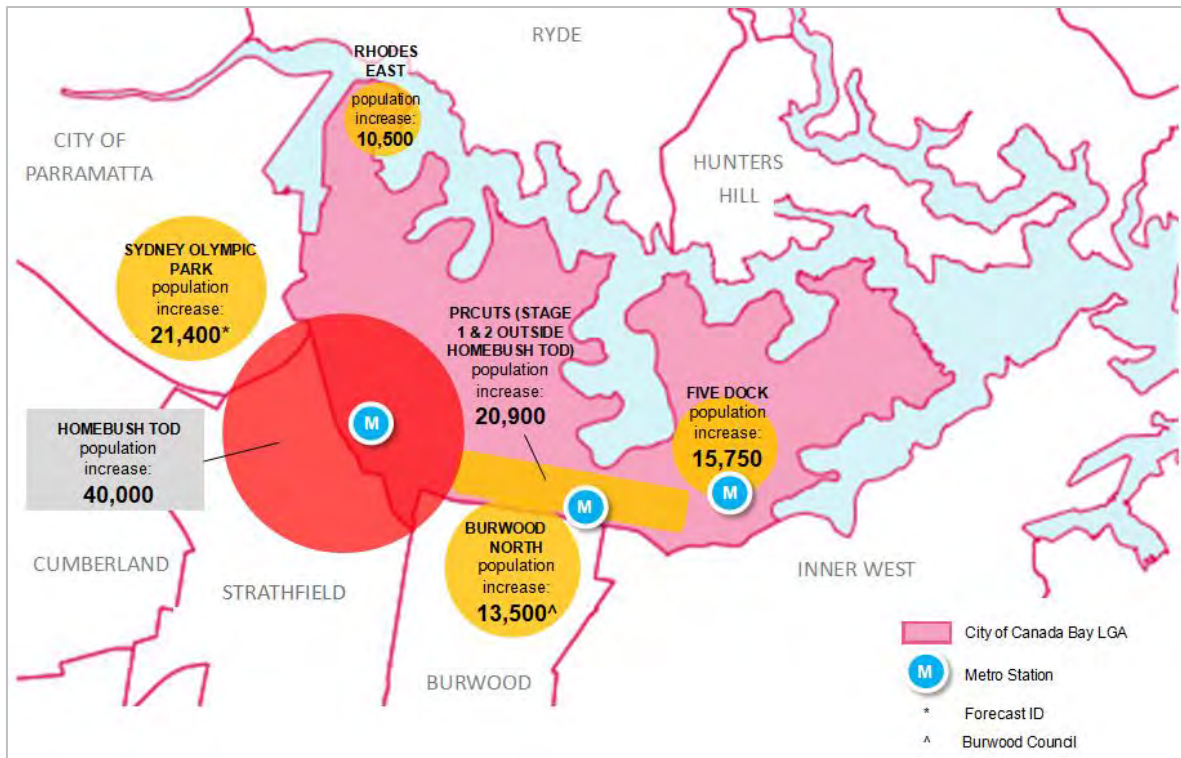


Figure 2: Summary of anticipate population growth within City of Canada Bay and surrounds

These population growth estimates do not include population growth arising from the state government’s recent Low and Mid Rise Housing reforms, 30% affordable housing reforms, or in-fill development throughout the remainder of Canada Bay.

The Homebush TOD precinct is characterised by limited and constrained east-west transport connections, flooding, and inadequate and aging infrastructure (drainage, key intersections, and rail overbridges). There has been no identification of, or commitment to, any additional public school, health, or any other regional infrastructure to support this anticipated population increase in the draft TOD plans on exhibition.

In this context, the additional 40,000 residents envisaged by the Homebush TOD is considered to be well in excess of what can be reasonably accommodated in this location.

b. School infrastructure

It is critical that school sites are identified as part of any planning process involving a significant change in population density, as it is cost-prohibitive to acquire sites for schools in established suburban areas after planning controls have been put in place. Council’s submission to the 2022 Parliamentary Inquiry into NSW Public Schools identified the catchments with the highest need for primary and high school student places within the City of Canada Bay as being Rhodes and North Strathfield/Strathfield, both of which were anticipated to experience an increase in school ages students of ranging from 72% to 257% between 2016 and 2031 (based on Forecast Id census data).

No new or augmented school infrastructure is identified as part of the Homebush TOD proposal. Additionally, the TOD plans identify an existing primary school site at North Strathfield (Our Lady of the Assumption, opened in 2015) as the location of one of the few new public parks within the TOD, suggesting that the community either loses a school to accommodate a small public park, or if the school is retained, then the small new park is not provided. It is recommended that this proposed park be relocated to an alternate location nearby so that the community can benefit from both assets.



Figure 3: Park proposed where current primary school (OLA) is located

c. Effective Infrastructure delivery

There is minimal guidance regarding the delivery of infrastructure within the precinct, creating significant risk for Council. Council’s draft submission requests that a detailed Infrastructure Strategy be prepared and included in the *Precinct Design Guide*. An Infrastructure Strategy would identify the infrastructure that is required to be provided by developers, describe the planning nexus between the infrastructure and future development, communicate the mechanism to deliver the infrastructure, and explain that the floorspace-transfer mechanism does not reduce a site’s overall development capacity.

Concerns are also raised regarding the approach to delivery of infrastructure, particularly costs of utilities, such as drainage, alongside new road infrastructure in a precinct that experiences flooding.

Given the significant emphasis of the *Precinct Transport Statement* in relation to encouraging a modal shift to public and active transport, it is recommended that a Public Domain Plan be prepared to move from aspirational lines on a map to a plan that is realistic and able to be implemented. A Public Domain Plan would provide further analysis as to how the recommended interventions could occur, how they will be funded and whether they can be accommodated within the existing road reserves. This analysis should involve the preparation of concept designs, consideration of impact on competing road users, involve engagement with relevant stakeholders, provide an indication of estimated cost and identify agencies responsibility for implementation.

d. Scale and Urban Design

The masterplan prepared as part of the Homebush TOD documents will create an extremely dense precinct with monolithic street walls that overshadow streets and neighbouring buildings, creating an unpleasant environment for the future community. Figure 4 below provides an illustration (to scale) of what Hamilton Street (opposite OLA primary school) will look like with 15 storey development on either side of the street. The TOD masterplan has not given sufficient consideration of the topography and orientation of the streets within North Strathfield, resulting in built form that is likely to create windy, overshadowed canyons lacking human scale elements

These poor outcomes illustrated in Figure 4 are repeated throughout the precinct, and highlight the importance of revising the proposed massing, building envelopes and development standards and controls to include podiums and revised street wall heights. The draft submission at Attachment 1 includes two alternative schemes for DPHI’s consideration, both of which demonstrate how an improved outcome can be achieved.



Figure 4: Street section – Hamilton Street, North Strathfield

e. Traffic and Transport modelling

The Homebush TOD is estimated to result in nearly 16,100 additional dwellings within the precinct. The *Precinct Transport Statement* (PTS) for the TOD prepared on behalf of DPHI has limited its transport needs assessment to levels that are comparable approximately of 46% of the full buildout of the TOD. No meaningful, metrics-based consideration has been given to the ‘master planning’ of the transport needs of the remaining 54% of the TOD precinct.

Of significant concern, at a little more than 46% of the TOD precinct’s development level, the *Parramatta Road Traffic and Transport Action Plan* (PRTTAP) identified a severely congested local traffic network even after assumptions were made that a high degree of through traffic would be re-routed outside of the corridor. More local road links and greater management of the interfaces between local streets and Parramatta Road (e.g. turn bans, clearway length extensions, more intersections etc.) would be expected after 2036 and should be identified in a Transport Master Plan for a full development scenario.

f. Open Space

The TOD plans propose a significant increase in population density without a commensurate increase in quality public open space. WA McInnes reserve (corner of George and Brussels Streets) is an example of this. The TOD plans propose a small increase in size of the existing reserve, resulting in a 1,200m² (30m x 40m) park. This small park is the only non-linear public open space north of Pomeroy Street in North Strathfield, however under the TOD plans, the land immediately north of the park is identified for a 12 storey residential development which will significantly overshadow the park and reduce its amenity and usability. The draft submission recommends that WA McInnes Reserve be extended from Brussels Street to Mena Street (Figure 5) to ensure the park is large enough for adequate sunlight access, usability and sufficiently sized to accommodate a children’s playground.



Figure 5: WA McInnes Reserve

g. Flooding

Both North Strathfield and the Strathfield triangle are prone to flooding, due to flooding from Powells Creek as well as from overland flows. The TOD plans propose a number of buildings in floodways, flood storage areas and high hazard areas, as well as a new road adjacent to Powells Creek (between Conway and Pomeroy Streets). It is unclear how a new road on flood prone land would be

constructed. The TOD plans should be amended to better consider flood hazards, and ensure that built form within probable maximum flood (PMF) floodways, flood storage areas and high hazard areas is avoided.

h. Inconsistencies

There are a number of inconsistencies between the different draft TOD planning framework documents. The proposed built form in the masterplan documents also contains several inconsistencies with current State government policy and Ministerial Directions regarding flooding, the *Apartment Design Guide*, and general requirements that councils are expected to address when submitting planning proposals to DPHI. There are notable absences of proposed controls such as minimum floorplate requirements, which are frequent inclusions in current LEPs to help ensure quality development that is both pleasant to live in, and which contributes positive to the streetscape and surrounds.

i. Principles and Key Actions

Further to some of the key issues outlined above, the draft submission also identifies a number of principles and key actions that are deemed necessary to achieve a desired outcome for the precinct:

- *Improve urban design outcomes by delivering density done well.*
Key Action: DPHI commit to a workshop with COX Architecture, Strathfield Council and the City of Canada Bay to revise the master plan.
- *Enable the delivery of high-quality streets and public spaces.*
Key Action: Prepare a Public Domain Plan for public open space, publicly accessible through-site links and existing and proposed streets.
- *Ensure that the proposed increase in density is supported by local infrastructure.*
Key Action: Prepare an Infrastructure Strategy to guide the implementation of local infrastructure.
- *Ensure that the proposed increase in density is supported by State and regional infrastructure.*
Key Action: Update the Infrastructure Delivery and Implementation Plan to include regional and State related infrastructure items.
- *Understand traffic impacts on the local and regional road network.*
Key Action: Revise the Precinct Transport Statement by validating the vision through modelling.
- *Ensure development controls are relevant to the Homebush TOD and are able to be implemented.*
Key Action: Review and update the Precinct Design Guide in collaboration with Strathfield Council and the City of Canada Bay.

TIMING, CONSULTATION AND RISK CONSIDERATIONS

Timing

DPHI announced the accelerated TOD program in December 2023, and a highly compressed timeframe has seen these documents prepared and placed on public exhibition from 16 July to 16 August 2024. Both the compressed timeframe and the proximity of the exhibition period to the forthcoming local government elections were raised as issues by both Canada Bay and Strathfield Councils during this process.

At the time of preparing this report, a local infrastructure contributions plan was not yet ready for public exhibition. Local infrastructure contributions plans are essential to support the delivery of infrastructure for the future population.

DPHI's short timeframe has meant there are some inconsistencies in the draft TOD documents, as well as insufficient time to effectively work through some of the more challenging issues in this precinct. By comparison, the State government's planning processes for Rhodes East and the Parramatta Road Corridor were undertaken over a number of years.

The deadline for the submission being made to DPHI is the close of the public exhibition period on 16 August 2024.

Consultation

During the preparation of these draft plans for the Homebush TOD, Council officers were invited to attend two Working Group and two Executive Advisory Group meetings convened by DPHI, with stakeholders from Canada Bay Council, Strathfield Council and DPHI. The Working Group was able to provide input for consideration by DPHI however this group was not a decision making body, and did not have influence over the content of the draft documents that have been prepared. The Executive Advisory Group was presented the information after it had been presented to the Working Group, and similarly, Council representatives attending these meetings were able to comment on the plans, however they had limited influence on the final draft documents placed on exhibition.

During exhibition period of the draft TOD suite of documents, between 16 July and 16 August 2024, DPHI has held a drop-in day for interested parties and hosted one online information session.

Landowners within the precinct were notified of the exhibition by DPHI. Due to the magnitude of the changes proposed, their potential widespread future impacts, and the compressed timeframes of the exhibition period, Council officers undertook a letterbox drop (which captured owners and residents living in the precinct and surrounds) over a wider area within the City of Canada Bay, encompassing parts of Concord as well as the precinct itself.

Risks

Both this report and the draft submission outline a number of risks associated with the Homebush TOD proposal, including: lack of inclusion of health, school and other regional infrastructure; traffic modelling assumptions; active transport assumptions; cost estimates attributed to some of the infrastructure identified; and the need to incorporate certain infrastructure elements within the key sites provision to give greater certainty over delivery and implementation. The draft submission also identifies the need for a Public Domain Plan and detailed Infrastructure Strategy to be included as part of the TOD framework of documents, both of which would reduce risks and increase certainty and effectiveness of delivery for Council at the implementation phase.

FINANCIAL CONSIDERATIONS

The draft submission includes a range of concerns and recommendations in relation to the delivery and funding of local infrastructure.

The DPHI has advised that a draft Local Infrastructure Contributions Plan will be prepared and exhibited separately to the EIE and supporting studies. Council has granted approval to the General Manager to determine whether consent will be granted to the Minister for Planning and Public Spaces to make the Local Infrastructure Contribution Plan.

LEGISLATIVE AND POLICY CONSIDERATIONS

If implemented, the Rezoning Review will result in new planning controls, delivered through a new State Environment Planning Policy (SEPP).

Development Applications within the Homebush TOD Precinct will be assessed as State Significant Development (SSD) where the Capital Investment Value (CIV) exceeds \$60M for residential development, with this approval pathway remaining in place until November 2027.



xx August 2024

Hon. Paul Scully MP
Minister for Planning and Public Spaces
GPO Box 5341
SYDNEY NSW 2001

Dear Mr Scully MP,

City of Canada Bay Submission

Homebush Transport Oriented Development Precinct

This submission has been prepared in response to the exhibition of the Explanation of Intended Effect (EIE) for the Homebush Transport Oriented Development Precinct (TOD Precinct).

The Homebush TOD Precinct will develop over the next 20 years and will result in built form that will remain in place for up to 100 years. Good places take time to design and the timeframe to finalise the Homebush TOD Precinct is inadequate to provide confidence that the best possible outcome will be achieved for existing and future residents.

Despite the accelerated nature of the TOD Program, this submission provides feedback and recommendations to the Department of Planning, Housing and Infrastructure (DPHI) to achieve better outcomes than those outlined in the EIE.

Whilst Council is supportive of increasing density within the vicinity of high frequency public transport, changes to the planning framework should only occur where positive outcomes for the community will be delivered. The proposal to locate over 25% of all dwellings (up to 16,100 dwellings) identified under the 8 accelerated TODs in a single precinct (Homebush TOD) is excessive. The Homebush TOD precinct is characterised by limited and highly constrained east-west transport connections, flooding, and inadequate and aging infrastructure (drainage, key intersections and rail overbridges). Council completed comprehensive planning for the implementation of PRCUTS Stage 1 within the required timeframes, and the quantum of development now proposed for this TOD is well in excess of what can reasonably be accommodated in this relatively constrained location.

16,100 new dwellings equates to approximately 40,000 people, with approximately 26,000 of these residents located within the City of Canada Bay under the proposed plans. There has been no identification of, or commitment to, any additional public school, health, or any other regional infrastructure to support this anticipated population increase. It is imperative that commitment to this essential supporting infrastructure occur concurrently with the planning for such a quantum step change in residential density, to provide assurance for Council, as well as eligibility for appropriate funding from State government Housing and Productivity Contributions.

Additionally, a local infrastructure contributions plan has not been prepared in time for concurrent exhibition with the TOD plans. A draft plan was prepared and circulated to Council for comment mid-way through the public exhibition period, with insufficient time (5 days) for Council to make meaningful comments. It is important that DPHI not proceed to finalisation of the TOD planning framework until such time as the local infrastructure has been prepared and exhibited in consultation with Council.

There are a number of other aspects of the Homebush TOD proposal that are ill conceived, such as proposed buildings located in floodways and flood storage areas, as well as in the existing loading dock areas of the Bakehouse Quarter where there is limited scope to relocate this important operational infrastructure. The TOD plans also propose a small new park at the current location of one of the two schools (OLA primary school) within the precinct, which is a lose-lose outcome for both the existing and future local community, presenting a scenario where provision of one element of social infrastructure is at the expense of another.

It is also critical that the proposed planning controls align with the principles and requirements of the State government's Apartment Design Guideline (ADG). There are several examples where this is not the case. The built form massing is poorly conceived with little regard to the landscape and features of the precinct on the ground. In North Strathfield, this will result in significant overshadowing and canyon-like streets due to the east-west orientation of the majority of streets. Basic controls such as maximum floorplate controls for buildings over 8 storeys, which are commonplace in modern LEPs to ensure quality built form outcomes, are also not included.

The following principles and key actions are deemed necessary to achieve this outcome:

- *Improve urban design outcomes by delivering density done well.*
Key Action: DPHI commit to a workshop with COX Architecture, Strathfield Council and the City of Canada Bay to revise the master plan.
- *Enable the delivery of high-quality streets and public spaces.*
Key Action: Prepare a Public Domain Plan for public open space, publicly accessible through-site links and existing and proposed streets.
- *Ensure that the proposed increase in density is supported by local infrastructure.*
Key Action: Prepare an Infrastructure Strategy to guide the implementation of local infrastructure.
- *Ensure that the proposed increase in density is supported by State and regional infrastructure.*
Key Action: Update the Infrastructure Delivery and Implementation Plan to include regional and State related infrastructure items.
- *Understand traffic impacts on the local and regional road network.*
Key Action: Revise the Precinct Transport Statement by validating the vision through modelling.

- *Ensure development controls are relevant to the Homebush TOD and are able to be implemented.*

Key Action: Review and update the Precinct Design Guide in collaboration with Strathfield Council and the City of Canada Bay.

It is requested that the principles, key actions and recommendations outlined in this submission be addressed prior to the finalisation of the Homebush TOD.

Should you require further information in relation to this submission, please contact Paul Dewar, Manager Strategic Planning on 9911 6402 or paul.dewar@canadabay.nsw.gov.au

Yours sincerely,

John Clark
General Manager

DRAFT

Introduction

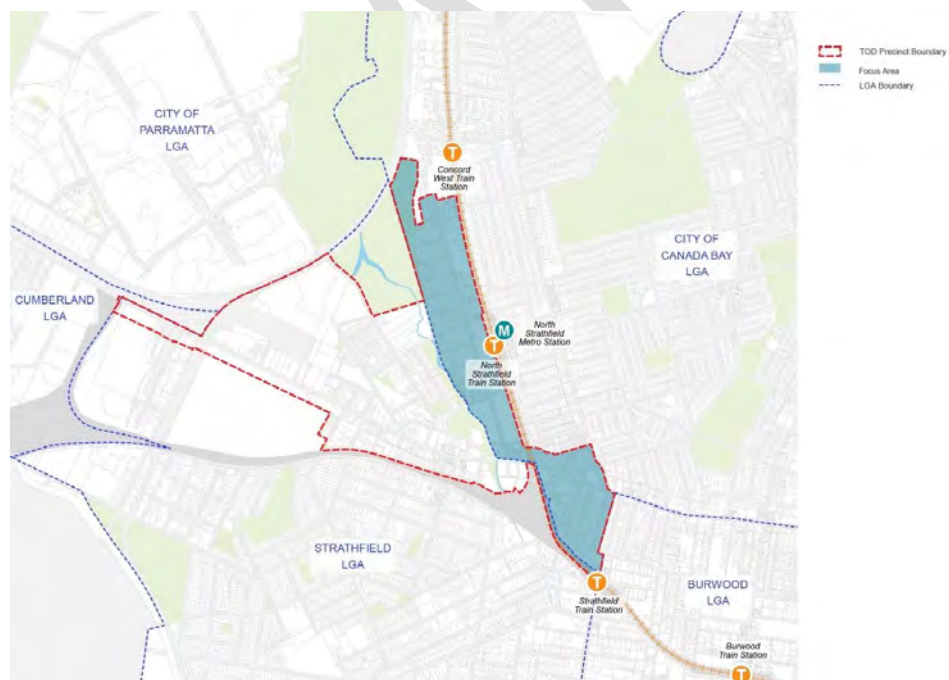
The submission is structured into the following themes:

1. Background and Strategic Planning context
2. Land Use and Urban Design
3. Infrastructure Delivery
4. Public Domain and Public Open Space
5. Traffic, Transport and Access
6. Flooding
7. Heritage
8. Community (Social) Infrastructure

1, Background and Strategic Planning context

Focus of Submission

This submission relates generally to land within the TOD Precinct boundary and specifically focuses on land within the City of Canada Bay Local Government Area (LGA) as shown below.



Land to which this submission relates

Overview

The City of Canada Bay Council is supportive of transport oriented development, however the proposal to locate over 25% of all dwellings (up to 16,100) identified under the 8 accelerated TODs in a single precinct (Homebush TOD) is excessive. The Homebush TOD precinct is characterised by limited and highly constrained east-west transport connections, flooding, and inadequate and aging infrastructure (drainage, road intersections and rail overbridges). Council completed comprehensive planning for the implementation of PRCUTS Stage 1 within the required timeframes, and the quantum of development now proposed for this TOD is well in excess of what can reasonably accommodated in this relatively constrained location.

Based on current occupancy rates, 16,100 dwellings would result in a population of approximately 40,000 people, with approximately 26,000 of these residents located within the City of Canada Bay. There has been no consideration of, let alone commitment to, any additional public school, health, or any other regional infrastructure. 26,000 new residents is equivalent to the population of a mid-sized regional city such as Taree, which has 7 public schools (5 x primary and 2 x high schools), at least 6 non-government schools, 3 post-secondary institutions, and a large hospital. It is imperative that planning for and a commitment to this essential supporting infrastructure occur concurrently with planning for such a significant step change in density.

Parramatta Road Corridor Urban Transformation Strategy

The Homebush TOD Precinct is located within the boundaries of the 'Homebush Precinct' outlined in the *Parramatta Road Corridor Urban Transformation Strategy* (PRCUTS).

PRCUTS is provided with statutory weight in accordance with Local Planning Direction 1.5 that requires consistency with PRCUTS and the associated *Parramatta Road Corridor Planning and Design Guidelines*. The Homebush TOD proposes a variety of departures to PRCUTS in relation to land use zoning, densities, building heights and a range of other requirements outlined in the Planning and Design Guidelines.

A proposal may be inconsistent with the terms of the Local Planning Direction if the proposal is justified by a study that clearly demonstrates better outcomes are delivered than identified in PRCUTS. Where Council or proponent-initiated planning proposals have been prepared that seek departures to PRCUTS, the Department of Planning, Housing and Infrastructure has consistently required a study to be prepared that specifically demonstrates better outcomes will be delivered, commonly referred to as a 'Better Outcomes Study'.

The Homebush TOD is inconsistent with PRCUTS, and the EIE and supporting studies do not satisfy the requirement for a Better Outcomes Study. There are a range of instances where the Homebush TOD does not demonstrate a better outcome than PRCUTS. The recommendations provided in this submission seek to ensure that the Homebush TOD delivers improved planning outcomes.

Local Planning Study

In July 2020, Council commenced engagement with the community to inform the preparation of draft Local Character Statements for land within the immediate vicinity of the North Strathfield Metro station. Following this engagement process, community feedback and technical advice were combined to produce a draft Local Planning Study.

The draft Local Planning Study was exhibited for community feedback in March 2022 and was further refined, before being endorsed by Council in May 2023. Council resolved to prepare a planning proposal and draft Development Control Plan for the North Strathfield Precinct, however this work was not progressed due to the Transport Oriented Development reforms initiated by DPHI.

The Local Planning Study for North Strathfield recommended significantly lower densities and building heights to those outlined in the EIE with buildings ranging in height from four (4) to five (5) storeys for land on the western side of George Street and up to eight (8) storeys within the Bakehouse Quarter and on the street block to the immediate west of North Strathfield train station.

Recommendation

- Review the quantum of residential dwellings/population proposed for the Homebush TOD in response to the issues raised in this submission.
- State government commitment to provision of essential regional infrastructure including, but not limited to, public schools and health (hospital) infrastructure, and include these items in the Homebush TOD documentation.
- Apportionment of the \$520M funding for the 8 accelerated TOD precincts based on number of dwellings/new population within each LGA.

2. Land use and Urban Design

Non-residential land uses

It is vital that the significant population proposed for the Homebush TOD precinct has access to convenience goods and services.

It is unclear how the quantum of non-residential uses has been determined and whether the amount of land zoned for retail and lifestyle/destination uses will be adequate to service the significant increase in population forecast in the Homebush TOD precinct.

An economic study should be prepared to assess the quantum of non-residential land uses needed to support the proposed population. Such an analysis should consider supermarket floor space, childcare, gyms and food and beverage offerings.

Urban Design

The masterplan prepared by COX Architecture will create an extremely dense precinct with monolithic street walls that overshadow streets and neighbouring buildings, creating an unpleasant environment for the future community. Some built form is located on flood-prone land, and there is no land set aside for schools.

These factors suggest that the proposed density is too high and it is recommended that the density be revised, based on:

- A detailed assessment of residential amenity and the amenity of streets,
- Adequate supply of non-residential uses and educational facilities, and
- Avoiding locating new buildings within floodways and high hazard flood areas.

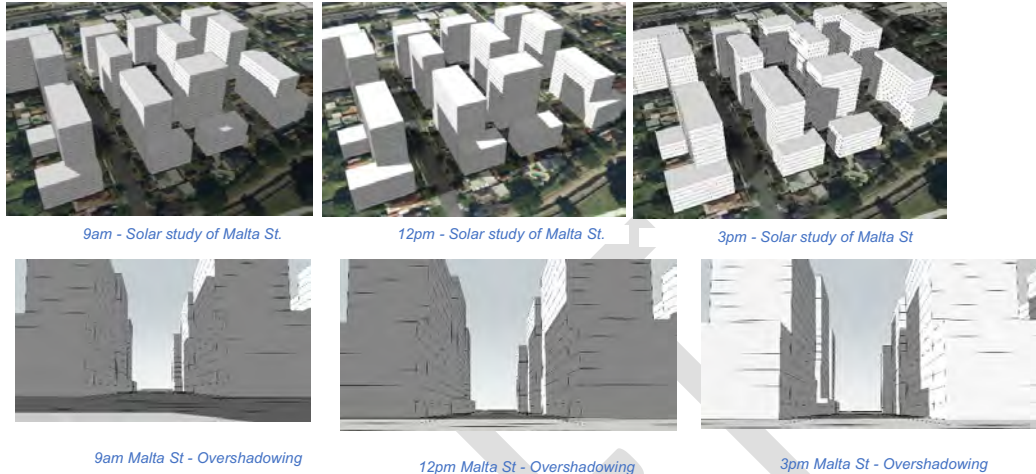


Perspective of proposed built form

North Strathfield

The masterplan's height strategy concentrates height in the middle of the blocks to minimise the impact of tall buildings on George Street and to create a consistent lower height street wall along Powells Creek. However, this approach does not consider that the majority of streets in North Strathfield are oriented east-west, which will result in overshadowed and windy canyon-like local streets. Whilst the solar access diagrams show most apartments receiving an

appropriate amount of sunlight, they do not fully consider the impact of neighbouring buildings, as illustrated below.



An alternative strategy is recommended, where the overall density for the precinct is reduced, and height is concentrated in areas of high amenity, including:

- along the expanded public open spaces adjacent to Powells Creek;
- along George St, as this will be the main access spine for vehicular, active and public transport; and
- around North Strathfield train/metro station, and between Pomeroy Street and the Bakehouse Quarter.

This strategy also includes reduced heights:

- on east-west streets, especially on the northern side of the street; and
- to the north of the Precinct near Concord West Station which is an area with limited access that is furthest away from North Strathfield Metro.

To demonstrate how the alternative height strategy may improve urban design outcomes and amenity for future occupants and streets, two schemes were prepared (see Appendix C). These schemes demonstrate that an improved outcome can be realised where lower street walls are provided on east-west streets and taller buildings are sited on part of a site.

Two 12 storey buildings north of Allen Street (sites 3D and 2C) are accessed off Elliott Street, which is a 10m wide lane. This 'street' may not be wide enough to accommodate the height of the built form proposed, nor the number of traffic movements that would be generated. It is recommended that further investigations be undertaken to ensure that Elliott Street will be able to support the density and traffic movements proposed.

Bakehouse Quarter

The Bakehouse Quarter is a unique area with considerable potential, however the site also has significant constraints. These constraints include the existing heritage fabric, extensive ground coverage, a minimal existing street network that is not interconnected with surrounding streets and the visual and access barriers created by the rail corridor, Parramatta Road and the M4 motorway. The Site is also too far away from North Strathfield Station or Strathfield Station to benefit from passing foot traffic.

The proposed location for residential towers above the heritage building in the Bakehouse Quarter creates towers without street addresses and places many residents against the railway line.

An 8-storey building is also shown on the location of the existing loading dock. This part of the site is likely to need to continue to function as a loading dock, due to site access constraints, and due to the difficulty of creating an internal loading dock within the heritage fabric of the site. The proposed building, including new residential lobbies, will interfere with the loading functions which will be crucial to the success of the Bakehouse Quarter as a focus for retail and commercial uses.

The masterplan proposes 24 and 30 storey towers at the south end of the Bakehouse Quarter, north of Parramatta Road. These towers will likely create unacceptable overshadowing of the existing and future residential towers on Nipper St and Colombia Lane and should be tested.

The proposed 2-storey podiums of the 24 and 30 storey buildings adjacent to Parramatta Road should also be tested to ensure they will not create residences that are adjacent to the elevated motorway. In this regards, the *Precinct Design Guide* should ensure apartment buildings are not able to be built beneath or immediately adjacent to elevated motorways.

There is a risk that the planned location for new apartment buildings will create poor outcomes for future residents and compromise the amenity, heritage and flexibility of the area to become a vibrant local hub. The TOD Precinct is an excellent opportunity to set appropriate planning controls that will resolve these challenges and ensure a successful heart for the future community.

It is recommended that this site-specific planning be undertaken to support the proposed changes to the planning controls for the 'Bakehouse Quarter' before the planning controls for the Homebush TOD are finalised.

Street wall heights

The creation of strong street walls through consistent building heights and street setbacks is supported. However, the height of the street wall in parts of North Strathfield is proposed to be 8 to 15 storeys high, which is not a pedestrian scale, and will overwhelm and overshadow local streets, creating windy spaces and a canyon-like feel. On George Street this is exacerbated by a narrow street setback of 3m.

The street wall height should be reduced so that it is experienced as 2-4 storeys, with towers set back above the podium. This will reduce the perception of height, minimise overshadowing

of the public domain, encourage moments of daylight to penetrate to streets, and break up the built form to 'confuse' wind, reducing its velocity. The floor space which is lost by reducing the street wall can be redistributed as additional height on slimmer towers. This is a similar approach taken by the City of Vancouver over the last 30 years, in districts such as Coal Harbour, West End and Yaletown, where slender point towers have been encouraged at the corners of development and 2-4 storey townhouses form street walls that activate streets and allow light to penetrate.

A section of Hamilton Street has been prepared to illustrate the extremely poor outcomes that will be delivered should the setbacks and building heights recommended by the EIE, Masterplan and Precinct Design Guide be implemented as proposed. These poor outcomes are repeated throughout the Precinct and demonstrate the importance of revising the proposed massing and envelopes and subsequent development standards and development controls to include podiums and revised street wall height.

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Street section – Hamilton Street, North Strathfield

The Masterplan should be revised and the *Precinct Design Guide* should be updated to include specific controls relating to street wall heights, street setbacks and upper level setbacks that are specific to each street and that deliver high amenity to the public domain and residences at ground level.

Tower forms

Where possible, the masterplan orients taller built form (i.e. built form that is over 8 storeys) in a north/south direction to minimise the impact of overshadowing on neighbouring properties. This approach is supported. However, taller buildings are often shown as slab towers, with lengths of over 40m. These towers can appear bulky in the skyline, create canyon like streets and exacerbate overshadowing impacts. The maximum floorplate should be consistent with PRCUTS to encourage point towers instead of slab towers, to provide breaks between buildings and maximise solar penetration to the public domain and communal areas.

Built form over 8 storeys should be limited to a 750m² GFA floorplate and expressed as a development standard, similar to Clause 7.5(2) of the Canada Bay LEP. The *Precinct Design Guide* should indicate appropriate locations of point towers, concentrated at alternative/ offset corners of blocks and limit the maximum length of towers.

Setbacks

The *Precinct Design Guide* illustrates the proposed building setbacks adjacent to the new road along Powells Creek as 6m. However, the detailed masterplan which identifies the possible yield shows built form with no set back from the new road. Setbacks should be based on the intended character and the impact on the public domain. A 0m setback is appropriate for areas that provides activation to urban areas, whereas 6m creates a more suburban landscaped setback and a wider more open feel to streets. In this case, a 6m should be required.

It is recommended that the 6m setback to the new road adjacent to Powells Creek be reflected in the masterplan.

Street address

The *Urban Design Report* shows instances of proposed buildings that will have no street address. These include the 6 storey building adjacent to North Strathfield Train Station, and five 8 to 12 storey buildings on site 1 in the Bakehouse Quarter. Buildings with no street address can create problems with wayfinding, emergency access, safety and parking, and should be eliminated at a masterplan level. The masterplan should be amended so that all buildings have a recognisable street address.

Floor Space Ratio testing

Floor Space Ratio (FSR) testing was undertaken of seven (7) blocks within the Precinct (see Appendix B). Most of the sites tested achieved the Gross Floor Area (GFA) identified in the *Urban Design Report*, with some exceptions where departures to building setbacks and to the Apartment Design Guide (ADG) would be required to achieve the maximum FSR. It is recommended that the proposed FSRs be reviewed to ensure that minimum setbacks and adherence to the ADG is achieved.

Isolated sites

The requirement that sites be amalgamated as per the Key Sites Map does not extend across the entire Precinct. In addition to the delivery of roads and open space, Key Site provisions and minimum lot size requirements also require the amalgamation of land. The exclusion of a majority of sites within the Precinct from the Key Sites Map and an amalgamation requirement will result in ad-hoc development occurring as random land parcels are acquired and developed. This may result in isolated sites that lack the potential to be developed to a higher density in the future.

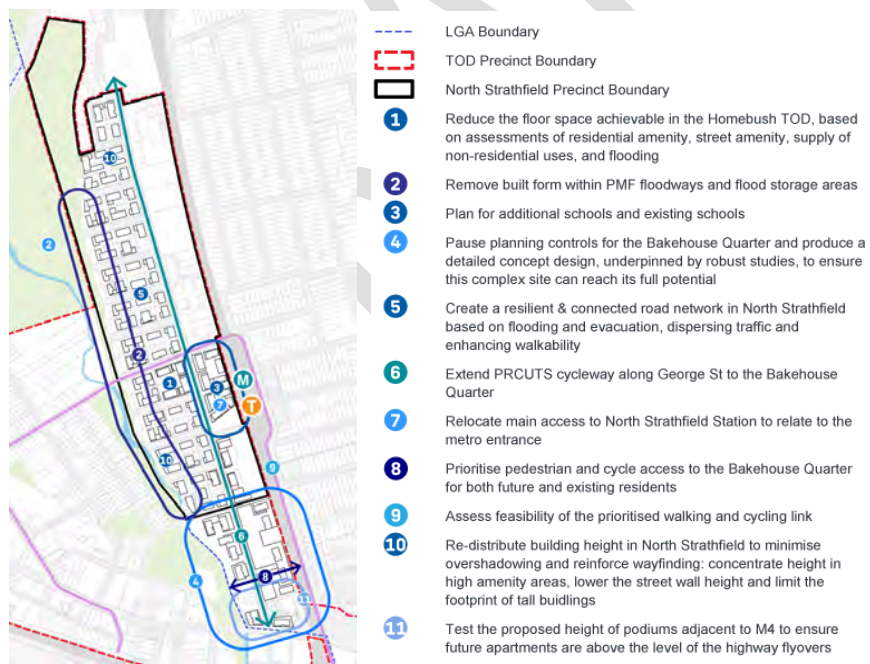
In this regard, minimum site area requirements provide benefits in relation to the realisation of intended urban design outcomes and avoidance of isolated lots, thereby enabling a coordinated development outcome.

It is requested that the Key Sites Map be updated to include amalgamation requirements for all Lots, or the *Precinct Design Guide* be amended to include amalgamation requirements for sites not identified on the Key Sites Map.

Recommendation

- Prepare an economics analysis to inform the quantum of non-residential floor space that is required to service the proposed population.
- Review the proposed density and built form to:
 - o Identify and zone land for new primary and secondary schools
 - o Remove buildings located in floodways or flood storage areas
 - o Revise the proposed height strategy to avoid creating streets that are unpleasant, overshadowed, overwhelming in scale, and windy.
- The alternative height strategy should concentrate building height in areas of high amenity and involve:
 - o increasing height along the expanded public open spaces adjacent to Powells Creek,
 - o increasing height along George Street, as this will be the main access spine for vehicular, active and public transport,
 - o increasing height around North Strathfield train/metro station and between Pomeroy Street and the Bakehouse Quarter.
 - o decreasing height on east-west streets, especially on the northern side of the street.
 - o decreasing heights to the north of the Precinct near Concord West Station which is an area with limited access that is furthest away from North Strathfield Metro.
 - o reviewing the proposed heights for buildings accessed from Elliot Street, North Strathfield.
- Undertake the necessary site-specific planning and supporting studies to support the proposed changes to the planning framework for the 'Bakehouse Quarter' before the planning controls for the Homebush TOD are finalised.

- Introduce a maximum tower floorplate standard for buildings over eight (8) storeys of 750m² GFA.
- Revise the master plan and *Precinct Design Guide* to:
 - reduce street wall heights to a maximum of four (4) storeys on east-west streets.
 - remove buildings that do not have a recognisable street address;
 - illustrate a 6.0m setback to the new road adjacent to Powells Creek;
 - review the proposed Floor Space Ratios to ensure minimum setbacks and adherence to the Apartment Design Guide; and
 - ensure that residential floorspace is sited above the level of adjacent elevated motorways.
- Include all sites on the Key Sites Map to require amalgamation or revise the *Precinct Design Guide* to include required amalgamation requirements for sites not identified on the Key Sites Map.
- Review and update the *Precinct Design Guide* in collaboration with Strathfield Council and the City of Canada Bay.



Summary of Urban Design recommendations



Summary of Urban Design recommendations (continued)

3. Infrastructure delivery

Housing and Productivity Contributions

The *Infrastructure Delivery and Implementation Plan* prepared on behalf of the DPHI for the Homebush TOD does not identify any State or regional infrastructure. The absence of planning for schools, hospitals, regional open space, regional active transport connections, road and transport upgrades is of significant concern.

It is essential that demand for State and regional infrastructure be assessed and works identified to enable necessary infrastructure to be included in Infrastructure Opportunity Plans. Unless State and regional infrastructure is specifically referenced in an endorsed State Government Plan or Strategy, such as the Homebush TOD, such works will not be eligible for funding from Housing and Productivity Contributions.

Local Infrastructure Contribution Plan

At the time of writing, the EIE for the Homebush TOD has been exhibited in the absence of a draft Local Infrastructure Contribution Plan. It is imperative that a draft Local Infrastructure Contribution Plan be finalised prior to the rezoning of land so that funds will be available to provide the necessary infrastructure for the growing population.

Key Sites

The City of Canada Bay is supportive of the proposed mechanism outlined in the EIE to deliver new open space and roads. The use of 'Key Site' provisions in the City of Canada Bay and other Local Government Areas have proven successful to ensure that public infrastructure is provided upon the redevelopment of land.

The precinct known as the Strathfield Triangle has been identified as a location for additional density for a number of years and the *Canada Bay Local Environmental Plan 2013* (LEP) reserves land for a range of public purposes within the precinct. The EIE for the Homebush TOD seeks to increase the permitted density in the Strathfield Triangle beyond that contained within the current LEP and introduce Key Site provisions to deliver new public open space. This new planning framework creates an opportunity to revise the current approach to deliver local infrastructure in the precinct.

It is requested that the following infrastructure in the Strathfield Triangle be delivered through the proposed Key Site provision:

- Proposed 3.0m road widening for land to the east of Cooper Street (Item 1).
- Proposed pedestrian/cycle link from Hilts Road to Leicester Avenue (Item 3).
- Proposed 9.5m wide laneway at the rear of properties fronting Leicester Avenue (Item 4).
- Proposed 'Cooper Street' realignment (Item 5).
- Proposed 3.0m road widening for land to the west of Cooper Street (Item 6).



Recommended Key Sites and Infrastructure items in the Strathfield Triangle

These items are necessary to enable redevelopment of the precinct to occur, have a direct nexus with development sites and may be provided on part of a site whilst continuing to facilitate significant uplift on the balance of the land.

In addition to the items in the Strathfield Triangle, the proposed multipurpose community facility in North Strathfield (see discussion under the heading Community facility below), the 6m green edge setback to Parramatta Road and required publicly accessible through-site links should also be identified in the 'Key Site' provision. Importantly, the inclusion of these items in the 'Key Site' provisions does not change the objectives or intended outcomes of the EIE.

Land reserved for acquisition

The EIE and associated Annexure of proposed statutory mapping amendments do not include any reference to land acquisition or a Land Reservation Acquisition Map. Confirmation is sought from the Department that there is no intention to reserve land for a public purpose to deliver local infrastructure. The City of Canada Bay is unlikely to consent to the reservation of land for public purposes given the significant financial implications for Council of acquiring land. The reservation of land is particularly problematic where the cost of land exceeds the income received from development contributions. The alternative "Key Site" provision that enables land and/or infrastructure to be delivered on land where an uplift in density occurs is supported for the Homebush TOD Precinct.

Delivery of infrastructure

The draft *Precinct Design Guide* requires sites to be amalgamated as per the Key Sites Map and to dedicate specified open space and roads to public ownership in order to access the maximum Building Height and Floor Space Ratio. However, there is minimal guidance in relation to the mechanism or process by which land will be dedicated. This will likely result in councils having to negotiate with developers on a case-by-case basis, which creates a high degree of uncertainty, consuming significant resources and time.

Other land, including pedestrian and cycle links are required to become public land or be publicly accessible via an easement. However, the draft *Precinct Design Guide* primarily limits active transport links to the existing street network. There is no guidance in relation to where new through-site links are to be provided and no information on how dedication or easements are to be facilitated.

It is requested that an Infrastructure Strategy be prepared and included in the *Precinct Design Guide*. An Infrastructure Strategy would identify the infrastructure that is required to be provided by developers, describe the planning nexus between the infrastructure and future development, communicate the mechanism to deliver the infrastructure, and explain that the floorspace-transfer mechanism does not reduce a site's overall development capacity.

An example of an Infrastructure Strategy prepared to support precinct planning is the [PRCUTS Stage 1 Infrastructure Strategy](#).

Recommendation

- Review and update the *Infrastructure Delivery and Implementation Plan* so that Housing and Productivity Contributions can fund works within the Homebush TOD.

The Plan must identify State and Regional infrastructure items, including but not limited to primary schools, secondary schools, hospitals, regional open space, regional active transport connections, State roads and public transport improvements.

- A draft Local Infrastructure Contribution Plan applicable to the City of Canada Bay be prepared and finalised prior to the rezoning of land within the Homebush TOD Precinct.
- Identify the following infrastructure items in the proposed 'Key Site' provision:
 - o Proposed 'Cooper Street' realignment.
 - o Proposed 3.0m road widening for land to the east and west of Cooper Street.
 - o Proposed 9.5m wide laneway at the rear of properties fronting Leicester Avenue.
 - o Proposed pedestrian/cycle link from Hilts Road to Leicester Avenue.
 - o Proposed multipurpose community facility in North Strathfield.
 - o Proposed 6.0m wide 'green edge' setback to Parramatta Road.
 - o Proposed land identified to deliver 'through-site links' throughout the Homebush TOD Precinct.

- DPHI confirm that there is no intention to reserve land for a public purpose in the Homebush TOD Precinct.
- Prepare an Infrastructure Strategy or update the *Precinct Design Guide* to explain how infrastructure will be delivered through 'Key Site' provisions.

4. Public Domain and Public Open Space

Public Domain Plan

The *Homebush Precinct Public Domain Strategy* report prepared by Tyrrell Studio recommends new open space and upgrades to existing areas of public open space and the draft *Precinct Design Guide* requires proponents to prepare a detailed public domain plan for future development that proposes new buildings and/or new public domain elements.

Other than outlining the general elements that should be included in a public domain plan, the *Precinct Design Guide* and the supporting *Public Domain Strategy* provide limited guidance for applicants and limited certainty for Council, who will inherit the land and works in public spaces.

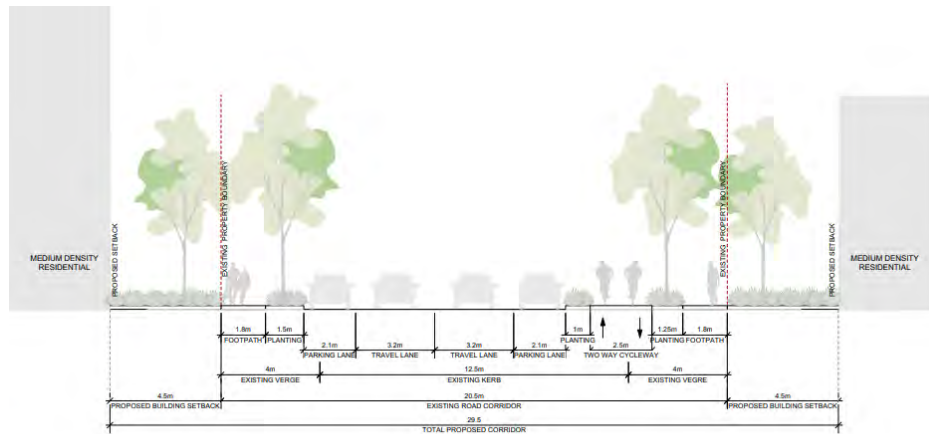
It is vital that applicants, Council and the relevant consent authority understand and agree on what is required to be delivered on land that is to be dedicated or embellished. Achieving quality public spaces and connections will only be possible where a Public Domain Plan is prepared upfront to provide an overarching vision and guidance for works in public spaces.

As the planning authority responsible for the Homebush TOD, it is incumbent on DPHI to prepare a Public Domain Plan in consultation with Council. Such a Plan must include all open space within the Precinct boundary, publicly accessible through-site links and existing and proposed streets.

Examples of Public Domain Plans prepared to support precinct planning are the [Parramatta Road Public Domain Plan](#) and the [Rhodes East Public Domain Plan](#).

Streets as public places

It is also important that appropriate planning controls be imposed to achieve desired outcomes in public streets. For example, a Public Domain Plan will enable a decision to be made as to whether streets need to be widened to create room for all road users, including vehicular traffic, separated cycle paths, street trees and to futureproof the area for buses. A decision can then be made to determine whether land dedication is required and whether the setback of buildings needs to be adjusted.



TYPICAL SECTION - GEORGE & KING STREET SPINE

Open Space adjacent to North Strathfield train/metro station

Whilst the existing pedestrian bridge across North Strathfield Station is located at the southern end of the platform, the *Sydney Metro West Environmental Impact Statement* shows the main circulation to North Strathfield metro station at the centre of the site. The new Park on Hamilton Street east is proposed to align with the southern side of the station and assumes that desire lines to the train and metro will remain in their current location to the south.

However, if one or both schools are relocated, the new Park should be planned for the centre of the site, at the end of Malta Avenue. Despite the location of Hamilton Street bridge, any plaza located further north would create more direct access for pedestrians and cyclists approaching the site from the north, west and south. The Hamilton Street shared zone would then move to Malta Avenue.

It is recommended that the proposed open space and associated main access to North Strathfield Station be located further north to better service the entrances of the metro and train station.

WA McInnes Reserve

Increasing the size of WA McInnes Reserve is supported, as it is the only non-linear public open space north of Pomeroy Street in North Strathfield and will help to relieve the street wall along George Street. It would be an ideal location for a children's playground, as its 400m catchment would service most of the residences north of Pomeroy Street.

However, the proposed park will be relatively small, measuring approximately 1,200m² or 30m x 40m. This size limits the types of uses that can be planned for this park. A 12 storey tower is also proposed directly to the north of the park, which would overshadow the park and reduce the amenity and usability, particularly as a children's playground.

It is recommended that WA McInnes Reserve be extended from Brussels Street to Mena Street to ensure the park is large enough for adequate sunlight access, frequency of use and ease of maintenance, as well as suitable programming (see also Appendix C).



Recommended extension of WA McInnes Reserve

Public Open Space north of Strathfield Station

Solar access to new public open space north of Strathfield train station is unsuitable at sites Manson Road Open Space (P13) - 40% and Swan Avenue Open Space (P14) - 20%. An alternate design solution must be achieved to provide high quality, useable public open space to the new residents.

It is recommended that the open space identified as P13 and P14 be consolidated into a larger public open space to achieve improved amenity, parks with greater functionality and operational efficiencies for Council.

Canopy Cover

The City of Canada Bay is strongly supportive of increasing tree canopy and has adopted an urban canopy target of 25%.

The objectives, provisions and the ambitious canopy targets for streets (Table 1), open spaces (Table 4), and attached dwellings and apartments (Table 6) as outlined in the Precinct Design Guide are supported. However, given the density of development proposed, a 30% canopy target for multi-dwelling housing is likely to be unachievable.

It is recommended that a tree canopy assessment be undertaken to determine if this target is achievable based on the draft Masterplan. An example of an urban canopy assessment that

was prepared to inform precinct planning and development controls is the [PRCUTS Stage 1 Urban Canopy Assessment Report](#).

Recommendation

- DPPI to prepare a Public Domain Plan in consultation with Council for open space, publicly accessible through-site links and existing and proposed streets.
- Where the Public Domain Plan identifies a requirement for streets to be widened to accommodate vehicular traffic, active transport, parking and plantings, the “Key Site” provision and Precinct Design Guide be revised to achieve this outcome.
- The proposed open space to the west of North Strathfield train and metro station be relocated to the centre of the street block to provide improved alignment with the station entrance and active transport desire lines.
- Extend WA McInnes Reserve from Brussels Street to Mena Street to ensure the park receives adequate sunlight access and is large enough for suitable programming, frequency of use and ease of maintenance.
- Undertake a tree canopy assessment to determine that the tree coverage targets are achievable

5. Traffic, transport and Access

Traffic

The Homebush TOD is estimated to result in nearly 16,100 additional dwellings within the precinct. The *Precinct Transport Statement* (PTS) prepared on behalf of DPHI has limited its transport needs assessment to approximately 46% of this development (expected by 2036) meaning that the traffic capacity needs findings of the *Parramatta Road Traffic and Transport Action Plan* (PRTTAP) are comparable to those of 46% of the full buildout of the TOD. No meaningful metrics-based consideration has been given to the 'master planning' of the transport needs of the remaining 54% of the TOD precinct.

At a little more than 46% of the TOD precinct's development level, the PRTTAP identified a severely congested local traffic network even after assumptions were made that a high degree of through traffic would be re-routed outside of the corridor. More local road links and greater management of the interfaces between local streets and Parramatta Road (e.g. turn bans, clearway length extensions, more intersections etc.) would be expected after 2036 and should be identified in a Transport Master Plan for a full development scenario.

Furthermore, whilst the vision and validate approach is recognised as the prevailing assessment approach, this does not mean that the potential risks associated with a selected vision should not be contemplated at all in the Master Plan; that is, not be validated.

The proposal is to double local travel demand to/from the Homebush TOD precinct compared to what was assessed in the PTS and at the same time to re-allocate road space on Parramatta Road to public transport. These proposals in combination suggest a substantial modal shift from current usage levels would be essential.

The quantity of modal shift required to walking, cycling and public transport (compared to current modal shares) should at least be validated in the PTS to understand if the scale of change is feasible, or if not achievable, how it may be counter-productive to attracting the scale of housing development targeted in such an area as Homebush. Further modelling / analysis is needed to validate the pragmatism of the vision at full build out and a better understanding of public transport capacity is required.

Please refer to the review of the Homebush TODS proposal prepared by Bitzios Consulting on behalf of the City of Canada Bay for further information (provided as Appendix D).

New Street adjacent to Powells Creek

Additional information is needed on the configuration of the new street along Powells Creek, in particular where it meets Pomeroy Street. It has the potential to result in a very high volume of traffic for drivers wishing to get in/out of the area to the north, bypassing congestion which will no doubt occur at the intersection of George Street and Pomeroy Street (notwithstanding planned upgrades). Note that there are significant utilities either side of Pomeroy Street crossing Powells Creek which may impact on the feasibility of a new street. There is also a risk that the proposed new street linking Underwood Road to Allen Street will create a new 'rat run' for drivers to bypass delays on State and Regional Roads. Further analysis is required on the implications of this new street.

Consistency with Infrastructure Delivery and Implementation Plan

There are significant inconsistencies between the infrastructure identified in the Precinct Transport Statement and those identified in the Infrastructure Delivery and Implementation Plan. For example, the Statement includes a 'raised threshold at intersection' along George Street which the Plan does not appear to include.

Active transport

A key opportunity identified in the *Precinct Transport Statement*, prepared by Arup, is to 'provide a connected active transport network of safe walking and cycling routes linked to key crossings of major barriers, and connections to key land uses, open space and transport nodes.' To achieve this objective, the *Precinct Transport Statement* identifies aspirational walking and cycling network interventions. The interventions prioritise walking and cycling links over the main northern railway line and over Parramatta Road via bridges.

Council is supportive of improving active transport connections over key barriers, including over the Pomeroy Street bridge and over Parramatta Road. These links require significant infrastructure with clear and viable funding mechanisms. Unfortunately, insufficient investigation has been undertaken to enable the interventions identified in the *Precinct Transport Statement* to be realised.

For example, the Pomeroy Street link will likely require additional land to be dedicated as road reserve, including additional space for elements such as a separated cycleway. A more direct link following the rail corridor between Cooper Street and Queen Street would likely deliver better connectivity and is consistent with the PRCUTS Planning and Design Guidelines.

Further, Council has been attempting to work with Sydney Metro to deliver a quality link along Queen Street and has concerns that current plans will not deliver the level of through connectivity required. The Department is encouraged to work further with Sydney Metro to assist in ensuring alignment between plans/outcomes.

Council recommends there be a cycling link along the eastern side of Powells Creek between Warsaw Street and Parramatta Road, in addition to the link proposed along George Street, and with a link across Powells Creet on the north side of Pomeroy Street.

Given the significant emphasis of the *Precinct Transport Statement* in relation to encouraging a modal shift to public and active transport, it is recommended that a Public Domain Plan be prepared to move from aspirational lines on a map to a plan that is realistic and able to be implemented. Such a Public Domain Plan would provide further analysis as to how the recommended interventions could occur, how they will be funded and whether they can be accommodated within the existing road reserves. This analysis should involve the preparation of concept designs, consideration of impact on competing road users, involve engagement with relevant stakeholders, provide an indication of estimated cost and identify agencies responsibility for implementation.

It is important that this work not be deferred to a later date as the successful implementation of the masterplan hinges on a significant shift to active transport and the implementation of these priority connections.

Bakehouse Quarter

For the Bakehouse Quarter to service the existing and future surrounding community, it should be well designed and better connected. The railway line, Powell's Creek, Parramatta Rd and Great Western Highway infrastructure create hard constraints to the Bakehouse Quarter's ability to facilitate vehicular movements and parking, including loading. Pedestrian and bicycle access and parking should therefore be prioritised in this area to alleviate traffic congestion and parking difficulties as much as possible. This is supported by the Responses 2, 3 and 5 of the *Precinct Transport Statement*. The pedestrian and cycle links shown in the image below should be prioritised.



Bakehouse Quarter recommended pedestrian and cycle links

Strathfield Triangle

The *Homebush Precinct Public Domain Strategy* report identified new pedestrian links through the Strathfield Triangle (L4). Whilst greater pedestrian permeability is supported, the careful location and quality of through-site links will be more important than their frequency. Leicester Avenue is difficult to cross, so it is important that through-site links are aligned to pedestrian

crossing points and link with pedestrian desire lines. It is recommended that two through-site links are retained and two removed.



- LGA Boundary
- - - TOD Precinct Boundary
- Strathfield Triangle Precinct Boundary
- T Strathfield Train Station
- Masterplan public open space
- ↔ Through-site link identified in public domain strategy not required
- ↔ Recommended through-site link
- ||| Masterplan pedestrian crossing point
- Pedestrian destinations

Suggested through-site links

153-165 Parramatta Road, North Strathfield

This island site, encircled by busy State roads on all sides, should be deferred from the TOD. This is necessary due to significant egress constraints. In August 2023, Council commissioned a traffic assessment for uplift of 144 dwellings on the site with a GFA of 10,131sqm.

The traffic assessment found that there would be significant queueing of vehicles attempting to exit the site onto Concord Road (given vehicular access from Parramatta Road is not supported by the Transport and Infrastructure SEPP). In the AM there would be a minimum of 3 vehicles queueing at any one time waiting to exit the site, requiring an access driveway within the site of greater than 15m. This was considered unacceptable by the traffic consultants and by Council officers.

The uplift tested by Council is significantly less than the 16,483sqm residential GFA proposed in the EIE. The additional uplift will further exacerbate the queueing length and time for vehicles to exit the site. The site should therefore be deferred from the TOD Proposal and further traffic investigations undertaken to ensure that the site can be redeveloped to the density proposed.

Car Parking

The City of Canada Bay is supportive of the application of car parking rates consistent with the PRCUTS. The PRCUTS *Planning and Design Guidelines* and the *Homebush TOD Precinct Transport Statement* apply the same car parking rates. However, Table 8 of the draft *Homebush Precinct Design Guide* changes these rates by referencing 'within 400m of a train station' and 'greater than 400m from a train station'. These references result in the proposed parking rates being applied differently to that recommended by PRCUTS and the *Precinct Transport Statement*.

Recommendation

- The full development **vision** and its associated transport actions included in the *Precinct Transport Statement* should be modelled to **validate** that the shift in modal share away from private vehicle usage needed across all trip purposes and all trip destinations is foreseeable.

Such an analysis should consider trips and modal shares to, from, within and through the precinct and should benchmark the required modal shares against developed centres in similar contexts elsewhere.

- DPHI prepare a concept Public Domain Plan to inform the implementation of interventions recommended by the *Precinct Transport Statement* relating to:
 - o the proposed new street along Powells Creek, particularly where it meets Pomeroy Street;
 - o aspirational and prioritised walking and cycling links;
 - o precinct environment interventions (quiet ways, footpath widening, shared zones, raised wombat crossings, signalised crossings, raised thresholds etc);
 - o intersection upgrades and new road alignments;
 - o principles and concepts to inform the design of public open space; and
 - o other public domain elements including embellishment of existing streets and publicly accessible through-site links.

- Remove through-site links in the Bakehouse Quarter and the Strathfield Triangle that are not required and identify through-site links that are required in the *Precinct Design Guide*, *Public Domain Plan* and *Infrastructure Strategy*.
- Update the draft *Precinct Transport Statement* and *Precinct Design Guide* so that all 'Tier 1' areas in the City of Canada Bay are subject to the same car parking rates as outlined in the *Parramatta Road Corridor Urban Transformation Strategy*.
- Defer the rezoning of 153-165 Parramatta Road, North Strathfield until further traffic investigations are undertaken to address significant egress constraints.
- Correct the inconsistencies between the Transport Statement and the Infrastructure Delivery and Implementation Plan.

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6. Flooding

Flood division line

North Strathfield and the Strathfield Triangle are prone to flooding, due to both mainstream flooding from Powells Creek and from overland flows. The *Flood Impact and Risk Assessment* includes recommendations for the location of built form, to minimise risk to life and property, including that proposed buildings should be kept clear of floodways and flood storage areas and states:

Typically, development within floodway or flood storage areas would be likely to push water into other areas, redistributing the flood risk, unless the development is carefully designed to avoid these impacts.

However, the masterplan proposes buildings in North Strathfield and the Strathfield Triangle within floodways and flood storage areas.

The *Urban Design Report*, which includes a Flood Division Line (Figure 25) references the Flood Assessment as the source of the data. However, the Flood Assessment does not reference or map the Flood Division Line. It is therefore unclear how it has been determined and there is no nexus between the two studies, providing no confidence that the Flood Division Line has been drawn in the correct location.

The flood division line does not align with the PMF floodway and does not continue to the Bakehouse Quarter or the Strathfield Triangle. It appears that the Flood Division Line is loosely based on *1% AEP Existing Case Hydraulic Categories for Floodway and Flood Storage*. Given this appears to be the case, and that there is land in the Strathfield Triangle that is Floodway or Flood Storage, the Flood Division Line should extend through the Triangle. This is important to provide confidence that the Rezoning Proposal is consistent with *9.1 Ministerial Direction 4.1 Flooding*, which prohibits development in a floodway.

The masterplan should be amended to better consider flood hazards. Built form should be avoided within PMF floodways, flood storage areas and high hazard areas. Larger setbacks may be required to built form in North Strathfield and parts of the Strathfield Triangle.

Flood related development controls

Clause 5.21 of the Canada Bay LEP relates to flood planning and applies to a 'flood planning area'. A 'flood planning area' is subject to flood related development controls and is typically illustrated on a Flood Planning Area Map. It is important that the draft *Precinct Design Guide* include a Flood Planning Area Map to enable the consistent application of Clause 5.21 of the Canada Bay LEP.

The *Flood Impact and Risk Assessment* made the following recommendations for DCP controls, which should be reflected in the *Precinct Design Guide*:

The relevant Council policies provide guidance on appropriate floor levels, underground parking entrance levels, building components and structural soundness, flood affectation, evacuation access and ongoing risk management. In addition to these the following points should be considered:

- *Consistent with the current design concept, final concepts should avoid areas of floodway and high hazard flow.*
- *Consistent with the current design concept, final concepts should provide for overland flow through the consolidated sites.*
- *Building and parking entrances should consider proximate flood behaviour and be located a preferable risk location. (sic)*
- *Ensure access is achievable, the following road locations have been identified as being potentially constrained for evacuation:*
 - *Cooper Street,*
 - *Parramatta Road (near Cooper Street, at Powells Creek crossing, at Underwood Road, at Bedford Road, at Telopea Avenue)*
 - *Allen Street,*
 - *Ismay Avenue, and*
 - *George Street.*
- *Flood awareness for the community to ensure that access constraints, short available warning times and storm durations are understood. Flood aware communities have been shown to be far more resilient than those with less awareness, reducing risks to life and damages from flooding.*

Recommendation

- *Revise the master plan to better consider flood hazards by avoiding buildings in PMF floodways, flood storage areas and high hazard areas.*
- *Extend the Flood Division Line through North Strathfield and the Strathfield Triangle.*
- *The development controls recommended by the *Flood Impact and Risk Assessment* be included in the *Precinct Design Guide*.*

7. Heritage

Heritage Interfaces

The *Urban Design Report* prepared by COS Architecture on behalf of DPHI includes an urban design principle to provide appropriate interfaces to heritage items. The draft *Precinct Design Guide* also includes requirements in relation to transition zones and sensitive interfaces and encourages 'the gradual stepping up of built form at the interface of existing low-rise development and proposed higher rise development' and to 'Encourage new development that is sensitive and complementary in scale to identified heritage'. Despite these principles and controls, the EIE will facilitate development that will not achieve this outcome.

The EIE proposes 21m maximum building heights along the eastern side of Swan Avenue. This results in 6 storey buildings sharing a boundary with single-storey buildings within the Mosely & Roberts Streets heritage conservation area. A more sensitive height and built form transition is needed to interface with existing residential areas, particularly with existing heritage items and heritage conservation areas to the east.

It is recommended that the proposed maximum height on the eastern side of Swan Avenue be more sensitive to the adjacent Heritage Conservation Area. Buildings with a height of two to four storeys are recommended and should be tested before proposed LEP height maps are finalised.

Similarly, the masterplan should take a more considered approach to the height of buildings in the vicinity of the heritage items on Manson Road. Buildings with a height of 6 to 12 storeys are proposed adjacent to and opposite single-storey heritage items on Mason Road, which will dwarf and overshadow these properties. This is exacerbated by the north-south orientation of the proposed buildings, which will present long edges to the heritage buildings.

To minimise the impact of built form on heritage items, a two to four storey street wall should be used, and taller buildings should be set back at upper storeys by at least 3m. Tower forms should be re-oriented, so they present a short edge to the street. Where possible, towers should be separated from heritage buildings.

Alternatively, given the degree to which the heritage-listed houses in Manson Road, Swan Avenue and Leicester Avenue will be compromised, demolition of isolated heritage items could be considered, with focus instead placed on ensuring a sympathetic setting for the retained heritage items that are proposed to be retained.

Bakehouse Quarter

The EIE proposes 27m, 30m and 44m towers on the eastern side of the Bakehouse Quarter, adjacent to the rail line. The GML heritage report recommends that future change for the Bakehouse Quarter should be guided by a comprehensive conservation policy and that a detailed assessment and historic building fabric analysis should be undertaken to determine tolerance for change, prior to any development.

Further, vehicular entries into the historic factory building from George Street should be considered as part of a heritage assessment.

For the reasons outlined under the heading 'Land Use and Urban Design', it is recommended that the Bakehouse Quarter be deferred from the Homebush TOD until site-specific planning is undertaken to support changes on the site.

Substation

The heritage-listed substation at 40A George Street, North Strathfield could be adaptively re-used and incorporated into a larger development, if/when it is no longer required as a substation, given its historical setting will be fundamentally altered.

Other heritage listings

The recommendation in the GML heritage report, that the heritage listing of Milling Place at 42P Swan Avenue (item I428) be reviewed, and that the house at 64 Concord Road, North Strathfield (item I108) be removed from the heritage schedule is supported.

Recommendation

- Buildings on the eastern side of Swan Avenue, adjacent to the Mosley and Roberts Streets heritage conservation area should be reduced to a maximum of 2 to 4 storeys.
- The height of buildings around heritage items be reduced by creating a 2 to 4 storey street wall, with taller buildings set back at least 3m at upper levels and oriented so they present short edges to the streets. Tall buildings should be separated from heritage buildings as much as possible.
- The Design Guide include a provision requiring a comprehensive a conservation policy and a detailed assessment and historic building fabric analysis be undertaken to determine tolerance for change prior to any development occurring in the Bakehouse Quarter.

8. Community (Social) infrastructure

General

The proposed 10,000 dwellings in Canada Bay (up to 26,000 people) is substantial and will lead to a significant increase in social need, if not planned in conjunction with changes to the planning framework.

The EIE and supporting technical studies do not include sufficient analysis in relation to the social impact and service needs.

Affordable Housing

The City of Canada Bay is supportive of future development in the Homebush TOD being required to provide affordable housing. It is expected that the amount of affordable housing will be determined based on the recommended densities and the outcome of feasibility testing.

Consistent with the requirements of the *Canada Bay Affordable Housing Policy* and the *Canada Bay Affordable Housing Contribution Scheme*, affordable housing in the City of Canada Bay is to be transferred in property title to Council and managed by a Community Housing Provider. Assurance is sought from the DPHI that the proposed LEP clause will not change this outcome.

Community facilities

The *Infrastructure Delivery and Implementation Plan* prepared for the Homebush TOD by Arcadis recommends the development of a new multipurpose community centre within the centre of the Homebush precinct near the Bakehouse Quarter. The Arcadis report states that this facility should be a 3,000sqm multipurpose district level library and community hub.

A multipurpose community facility in this location is needed to satisfy the demand generated by the proposed population and is consistent with needs identified within the *Canada Bay Social Infrastructure (Community) Strategy*.

Rather than relying on a Local Infrastructure Contribution Plan to provide this infrastructure, it is requested that the multipurpose facility be delivered through the proposed 'Key Site' provision. This approach will bring forward the delivery of this infrastructure and ensure that appropriate public benefits are provided to complement the proposed increase in density.

Precedent for this approach can be found in Clause 7.4 of the *Lane Cove Local Environmental Plan 2009* for the St Leonards South Area. The Lane Cove LEP requires a community facility to be provided prior to development accessing 'Incentive Height of Building' and 'Incentive Floor Space Ratio' standards on an identified site.

Relevant locations to provide the multipurpose facility include land that is experiencing a significant uplift in FSR and includes land to the immediate east of the North Strathfield Metro station (103m or up to 30 storeys) or the proposed new Mixed Use Zone on the corner of George Street and Pomeroy Street (62m or up to 18 storeys).

Estimated costs

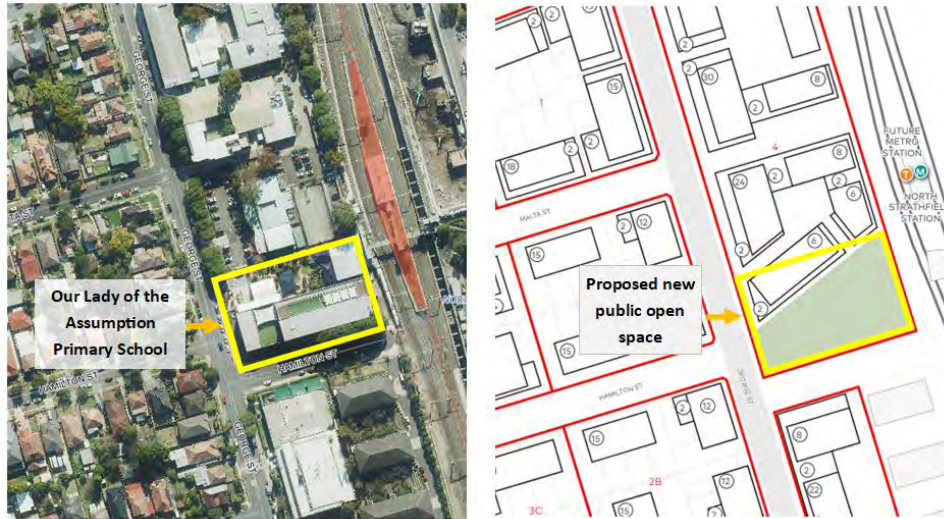
There are a number of the estimates in the *Infrastructure Delivery and Implementation Plan* that appear to significantly undervalue the cost of works. For example, the walking and cycling link on Princess Avenue to Gipps Street via Patterson Street (A4) will require a separate cycleway with significant changes to kerb alignment and other existing infrastructure. There are a range of times that exceed the estimated cost that are included in the Infrastructure Delivery and Implementation Plan. In Council's view, it is important that these costs be reviewed and where relevant, updated, prior to being included in a draft local infrastructure plan.

School infrastructure

An additional 16,000 dwellings are proposed throughout the TOD precinct, of which approximately 10,000 are within the City of Canada Bay. The 2021 census for the Homebush SA2 covers most of the Homebush TOD Precinct and counted 2.6 people per household, meaning that the population of the Canada Bay part of the TOD Precinct could increase by approximately 26,000 residents.

The census identified that 11.8% of the population are between 4 and 19 years old, meaning potentially over 3,000 of the additional residents will be school aged children. Despite this no new schools have been proposed in the TOD Precinct, and the only two existing schools in the TOD Precinct, The McDonald College and Our Lady of Assumption Primary School, are identified as being replaced with mixed use development.

It is critical that school sites are identified as part of any planning process involving a quantum change in population density such as proposed by this TOD, as it is cost prohibitive to acquire sites for schools in established suburban areas after planning controls have been put in place. Additionally, the TOD plans identify an existing primary school site (Our Lady of the Assumption, relatively new, opened in 2015) as one of the few new public parks within the TOD, suggesting that the community either loses a school to accommodate a small public park, or if the school is retained, then no additional public open space is provided in this part of the TOD where the greatest population density is proposed.



Park proposed where current primary school (OLA) is located

Concord High School is the only public high school in the City of Canada Bay. In 2022, the school had an enrolment of 1,262 students and has minimal capacity to absorb the number of high school students arising from the proposed Homebush TOD Precinct. The demand for student places from the Homebush TOD Precinct is in addition to population growth occurring in the Rhodes peninsula, the Parramatta Road corridor and in vicinity of other metro stations and centres in the City of Canada Bay.

Council's submission to the 2022 Parliamentary Inquiry into NSW Public Schools identified the catchments with the highest need for primary school student places within the City of Canada Bay as being Rhodes and North Strathfield-Strathfield, with Forecast id data indicating a 172% and 72% increase in primary school aged children between 2016 and 2031. Similarly, this submission identified the catchments with the highest need for high school places within the City of Canada Bay as being Rhodes and North Strathfield-Strathfield, with Forecast id data indicating a 257% and 92% in high school aged students between 2016 and 2031.

Council's submission also presented analysis that indicated the quantum of population growth forecast for the City of Canada Bay public school catchments meant that the two new proposed schools (primary school at Rhodes and high school at Wentworth Point) would not close or reduce the gap in local public school places. <https://www.parliament.nsw.gov.au/lcdocs/submissions/76926/0007%20City%20of%20Canada%20Bay.pdf>.

With an estimated new population of over 40,000, approximately 26,000 of which are envisaged as new residents within the Canada bay part of the Homebush TOD, it is fundamental that the planning for school infrastructure occurs prior to the rezoning of land. This process should involve direct engagement with School Infrastructure NSW, and should identify the demand for school infrastructure to meet the needs of the growing population,

identify the preferred location for new schools and zone land accordingly. It is untenable for Council and the community to accept land being rezoned for significant densities without those plans making provision for enabling infrastructure being in place.

This is particularly pertinent given the framework established by DPHI for the funding of regional and State Government infrastructure. Unless regional and State Government infrastructure is identified in an endorsed Structure Plan/Master Plan/Place Strategy, it will not be eligible for inclusion in an Infrastructure Opportunity Plan (IOP) and will not be eligible for funding under the Housing and Productivity Contribution.

Health infrastructure

Insufficient analysis has been undertaken to determine the need for new or expanded health infrastructure. Effective demand planning will allow for the strategic expansion or upgrading of infrastructure, such as the addition of new beds, departments, or specialised services. By anticipating demand, hospitals can plan for appropriate capacity, which helps prevent overcrowding and ensures that patients receive timely care.

The Department should consult with the Department of Health, as the Department has indicated previously that it is looking to establish a health facility within the Homebush precinct.

Recommendation

- DPHI confirm that the proposed affordable housing clause will continue to ensure that affordable housing units are transferred in property title to Council.
- Identify the proposed multipurpose community facility to be delivered through the proposed 'Key Site' provision and provided on land in the vicinity of North Strathfield train station.
- The NSW Government must identify the demand for new primary and secondary schools to support the proposed increase in population. These needs must be reflected in the Infrastructure Delivery and Implementation Plan and land zoned for primary and secondary schools.
- DPHI to consult with the Department of Health to determine implications for State health facilities and augmentations to existing health facilities. These needs must be reflected in the Infrastructure Delivery and Implementation Plan.

Appendix A

Precinct Design Guide

The following are suggestions for improving the Precinct Design Guide:

Section 4.2 Public Domain

- Principle f) states “high quality public spaces for use by the general community for passive recreation, working, collaboration, culture and living”. Suggest adding active recreation and children’s playgrounds to ensure these are considered in the design and distribution of open spaces.
- Suggest that all new streets are required to be built with underground powerlines. This will amend the “new streets” section of Table 1: Public Domain Tree Canopy.
- Section 4.2.2 Publicly Accessible Open Spaces should refer to public spaces, and incentivise the dedication of open space to public entities.
- Section 4.2.2 Publicly Accessible Open Space provisions should include a map showing the types of uses that should be provided in each park. This is to ensure the equitable distribution of activities and uses such as children’s playgrounds, dog parks, active recreation, linear recreational activities etc.

Section 4.4 Tree and Ecology

- Section 4.4, including Tables 4-6 should be strengthened to avoid discretionary language such as “where possible”.
- Section 4.4.1, Provision 1 should ensure a minimum of 70% native species.
- Section 4.4.1. Provision 4 should be strengthened by avoiding language such as “where possible”, being precise about what is considered “existing mature trees in good health and condition” and by requiring applicants to show options that include the existing trees to better assess the true impact of retaining them. Trees to be retained should be protected in accordance with the Australian Standard AS 4970-2009 – “Protection of Trees on Development Sites” to ensure viable retention.
- Section 4.4.1, Provision 5 refers to tree categories and correlating size / canopy area in Table 5 that are not appropriate to ensure alignment with a healthy, sustainable and diverse Urban Forest. A small to medium tree should be no less than 12 metres height at maturity and a large tree should be no less than 18-25 metres height at maturity. The indicative mix of trees should be a minimum: 40% large trees (>18 metres height at maturity), 45% medium trees (12 metres or greater) and 15% small trees.
- Section 4.4.2, Provision 6 should be as per the Apartment Design Guide, as a minimum 3m x 3m deep soil provision is less than the ADG provision.
- Section 4.4.3, Provision 1 should require protection and maintained health of existing mature trees in accordance with AS4970 Protection of Trees on Development Sites and AS4373 Pruning of Amenity Trees.

- Section 4.4.3, Provision 2 should require development within a calculated Tree Protection Zone (TPZ) to be in accordance with AS4970. The Guide also needs to include a definition of 'Significant Tree' and clearly define what legislation it is protected under.
- Section 4.4.3, Provision 4 should also require replacement planting in accordance with Canada Bay DCP or minimum ratios of 2:1 on lots greater than 350sqm.
- Section 4.4.4 should be strengthened to require compliance with provisions for biodiversity and habitat connectivity, such as the Canada Bay DCP provisions 6.4 and 6.5.
- Section 4.4.4, Provision 5 should require a Landscape Plan or a Vegetation Management Plan (VMP), where required by provision 4.3.1 Landscape design, is to incorporate any relevant recommendations of the Ecological Assessment report / Vegetation Management Plan / Review of Environmental Factors / Arboricultural Impact Assessment

Section 4.5 Movement network, Streets & Laneways, Bike and Pedestrian Connections

- Figure 5 Access and Movement Network should show active transport links in more detail to better guide future development. Existing and planned footpaths, separated cycleways, shared paths, on-road cycleways should all be shown differently on the plan to avoid confusion.

Section 4.6 Built Form

- The objectives under section 4.6 Built Form should include "to create a high quality desirable place to live, work and play".
- Section 4.6 Built Form objective d) should include "to improve the urban structure".
- Section 4.6.1, Provision 5 should include "built form is to be designed to activate and deliver safe streets and open spaces", after "Built form is to be positioned for optimal access to daylight".
- Section 4.6.2, Provision 4 should include "and safety of" after "Changes in scale should be explored to create interest and enhance the relationship".
- Section 4.6.3, Provisions 1 and 2 should change the word from "encourage" to "ensure" to protect the setting of low scale heritage items, such as single storey houses.
- Section 4.6.4 should specify numeric setbacks above the street walls. This should be based on urban design testing, may be site-specific, and should aim to accentuate the street wall and reduce the monumentality of tall buildings, reduce the perception of building height from the public domain, reduce wind tunnel effects, and encourage more daylight into streets.
- Section 4.6.4, Provision 5 need to be revised as the articulation zones of 0.3m and 0.6m are too narrow to create meaningful articulation. Setbacks and articulation zones

should both be increased to ensure that at least 1m of façade modulation can be achieved.

- Figure 10: A 1-2 storey podium is shown for 165 Parramatta Rd. Suggest this is raised to 3-4 storeys and that residential uses are not permitted within the podium facing highway infrastructure. This is to ensure that the lowest level of future residences have reasonable visual privacy and are able to open their windows.

Section 4.7 Building Layout, Design and Amenity

- Section 4.7.1 should specifically refer to improving the safety of residents and the public domain and may include references to CPTED principles. This is to ensure the provisions are not treated from an aesthetics point of view only.
- Section 4.7.2, Provision 4 should include “replace with breaks down the mass and scale of the building.” After “projections that create interest and”.
- Section 4.7.3 needs to include two scenarios, one for active frontages that are not in a heritage-listed building and one for active frontages that are in a heritage-listed building. The first scenario (for buildings that are not heritage-listed) should encourage active frontages to provide narrow frontages with doors to separate residential and non-residential units every 8m at a minimum. The second scenario (for buildings that are heritage-listed), the provisions need to ensure that existing masonry walls and original openings are maintained, and that any new openings are assessed as part of a heritage assessment.
- Section 4.7.4, Provision 1a) requires “a pedestrian entry and/or primary private open space overlooking the street every 15m.” This distance should be reduced to 8m.
- Section 4.8 needs to require vehicular entries into the Bakehouse Quarter from George Street to be considered as part of a heritage assessment.

Section 5.2 Heritage and Conservation

- Provision 3(c) should be deleted as this is too open-ended, council may not agree with existing policies, and new policies may be more useful than existing.
- Table 15, Heritage area controls for the Bakehouse Quarter
 - o The meaning of the phrase “visual impacts to heritage significance” is unclear and needs to be clarified so as to be implementable.
 - o The meaning of the phrase “New parapets along the western side of George Street are to be lower at the street edge” is unclear and needs to be clarified. Is it intended to mean that new buildings are to have a parapet at the same height as the heritage building, or lower than the heritage building?

Appendix B

Floor Space Ratio testing

Methodology

The following methodology was used to test the building envelopes and FSR in the sites identified above:

- The plans in the Urban Design Report (pages 71, 77, and 101) guided the height and extent of built form.
- The assumptions in the Urban Design Report (pages 63, 70, 76 and 100) were applied.
- The front setbacks detailed in the Urban Design Report were applied as minimums.
- GFA measurements were undertaken using CAD software and compared against the GFA provided in the Urban Design Report.
- The ground floor of each block was reduced by approximately 1,000m² GFA to allow for driveways, garbage rooms and other features that don't count towards GFA.

Location	Block	Urban Design report				Testing				Discrepancies	
		Block size	Non-res	Res	FSR	Block size	Non-res	Res	FSR	Non-res.	Res.
North Strathfield - Mena St to Brussels Street	1A	7,391	-	20,694	2.8 :1	7,392	-	21,688	2.9 :1	-	+994
	2A	7,507	-	16,515	2.2 :1	7,549	-	19,565	2.6 :1	-	+3,050
North Strathfield - Pomeroy St to Hamilton St	1	9388	3,285	29,572	3.5 :1	9,421	3,400	35,986	4.2 :1	+115	+6,414
	2A	7957	-	25,462	3.2 :1	7,958	-	25,946	3.3 :1	-	+484
	3A	8897	-	24,911	2.8 :1	8,885	-	24,913	2.8 :1	-	+2
	3B	7945	-	22,246	2.8 :1	7,945	-	22,549	2.8 :1	-	+303
Parramatta Rd	5	6,105	1,831	16,483	3.0 :1	5,856	1,870	16,361	3.1 :1	+39	-122



Findings

The following findings are drawn from testing the building envelopes and FSR in the sites identified above:

- Most of the sites tested achieved the gross floor area (GFA) identified in the Urban Design Report. The exceptions were the Mena St to Pomeroy St site 2A and Pomeroy St to Allen St 'Site 1'.
- In some instances, it was uncertain how the required ADG building separation could be achieved. For example, site 3B, south of Malta St. As tested, the site achieved the same GFA stated in the Urban Design Report, but only achieved a 22m separation between the two 15 storey buildings. Considering their orientation, it would be difficult to design these buildings so that a non-habitable façade is facing a habitable façade, so the minimum separation required by the ADG would be 24m. It is also noted that, to achieve the stated GFA, the southern building was tested using a 3m setback, not a 6m setback as required by the rezoning material.
- Typically, rectangular "slab" towers were used. Their size was minimised, with depths of 18-20m and lengths usually less than 45m. This is an efficient built form, and when oriented in a north/south direction can help minimise overshadowing to neighbouring buildings.
- In some instances, square "point" towers 25m x 35m were used instead, but the purpose of these changes was not clear. Point towers create efficient floor plates for taller towers that require a larger core, and which can accommodate apartments facing in every direction.
- Podiums were often longer, but not usually over 60m, so not excessively long.



Site 3B as tested, shows the two 15 storey buildings separated by 22m instead of the required 24m. The front setback to Hamilton St was also reduced to 3m instead of 6m to achieve the GFA nominated in the Urban Design Report.

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Appendix C

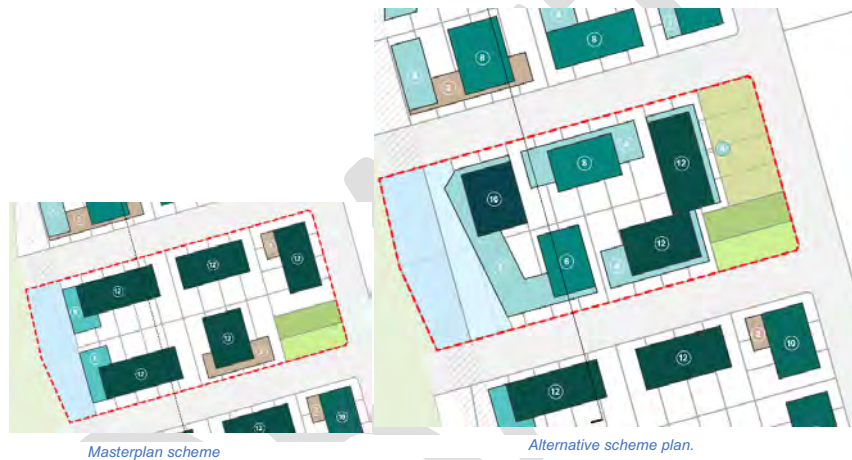
Alternative scheme testing

Alternative test site solutions: Mena St to Brussels St

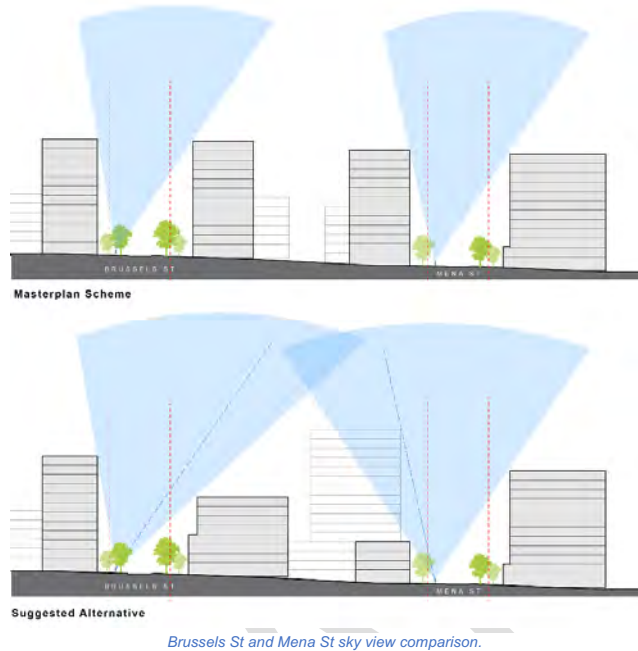
An alternative massing scheme was prepared for a test site between Mena St and Brussels St.

The alternative scheme removes buildings from the flood storage zone and increases the size of WA McInnes Reserve so it provides usable open space and relief from built form along George St.

It also reduces the street wall to 4 storeys, allowing more light into the street and providing a wider view of the sky for pedestrians and residents of lower floors.



	GFA (m ²)	Public open space	Flood storage space	Buildings in flood zone	Street wall height
Masterplan scheme	37,209	1,121	1,813	2	2-12 storey
Alternative scheme	34,591	1,530	2,978	0	4 storey
Change	7% decrease	136% increase	64% increase	reduction	reduction



Brussels St and Mena St sky view comparison.

Alternative solutions: Pomeroy St to Hamilton St

The alternative massing scheme for the test site between Pomeroy St and Hamilton St removes buildings from the flood storage zone and reduces the street wall to 4 storeys, allowing more light into the street and providing a wider view of the sky for pedestrians and residents of lower floors.

The taller towers in the alternative scheme cast longer shadows, but they move quickly and have minimal impact on neighbouring buildings. Importantly, Hamilton St and the residences on the south side of Hamilton St will receive more light throughout winter.



Masterplan scheme



Pomeroy St to Hamilton St alternative plan.

	GFA (m ²)	Flood storage space	Buildings in flood zone	Street wall height
Masterplan scheme	47,708	2,223	4	2-15 storey
Alternative scheme	50,208	4,854	0	4 storey
Change	5% increase	106% increase	reduction	reduction



Hamilton St street elevation.

Appendix D

Traffic/Transport Advice (over page)

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Gold Coast
Suite 26, 56 Riverwalk Avenue
Robina QLD 4226
P: (07) 5562 5377

Brisbane
Level 2, 428 Upper Edward Street
Spring Hill QLD 4000
P: (07) 3831 4442

Sydney
Studio 203, 3 Gladstone Street
Newtown NSW 2042
P: (02) 9557 6202

W: www.bitziosconsulting.com.au

M: PO Box 5102 Q Super Centre
Mermaid Waters QLD 4218

E: admin@bitziosconsulting.com.au



Our reference: P8616.002L Homebush TOD Proposal Review

30 July 2024

General Manager
City of Canada Bay
1a Marlborough Street
DRUMMOYNE NSW 2047

Sent via email: Paul.Dewar@candabay.nsw.gov.au

Dear Sir,

RE: REVIEW OF HOMEBUSH TOD PROPOSAL

This letter provides our review of the draft plans for the Homebush Transport Orientated Development (TOD) proposal as recently exhibited by the Department of Planning, Housing and Infrastructure (DPHI).

This review references our previous work for the Parramatta Road Corridor Traffic and Transport Study and Action Plan (*PRTTAP*) dated 18th February 2022. We have reviewed the input assumptions and outcomes in our 2022 report against the:

- Homebush State-led Rezoning Urban Design Report (Cox, July 2024), the '*UDR*'
- Homebush TOD Rezoning Precinct Transport Statement (Arup, 3 July 2024), the '*PTS*'
- Infrastructure Delivery and Implementation Plan - Homebush State-led Rezoning (Arcadis, 3 July 2024), the '*IDIP*'

1. Development Scale Considerations

The *PRTTAP* was (in part) based on Canada Bay Council's plans for development 'uplift' proposals for the Homebush North and Homebush South precincts as summarised in Figure 1.1, and referred to in that report as the '*uplift areas*'. Outside of the Canada Bay Council, Strathfield Council and Burwood Council uplift areas, the remainder of the study corridor took its land use assumptions for the Parramatta Road Corridor Urban Transformation Strategy (*PRCUTS*).

Using the data in Figure 1.1, an estimate of the *PRTTAP* full buildout population within the DPHI Homebush Precinct Boundary is 29,000-30,000 people and at 2.5 persons per dwelling (consistent with *UDR* assumption) would equate to about 11,500 dwellings. As shown in Figure 1.2, this compares to a residential capacity of 22,900 dwellings published in the *UDR*.

In terms of the spatial distribution of population density, the *UDR* generally maintains *PRCUTS*-planned dwelling densities fronting Parramatta Road. The primary locations where dwelling density and hence Floor Space Ratios (*FSRs*) are proposed to be increased in the *UDR* are along George Street (west of the T9 line) and along Underwood Road, as shown in Figure 1.3.

The *UDR* is silent on development assumptions in the Homebush North Precinct outside of the structure plan area which we presume will default to Council's planning intentions as included in the *PRTTAP*.

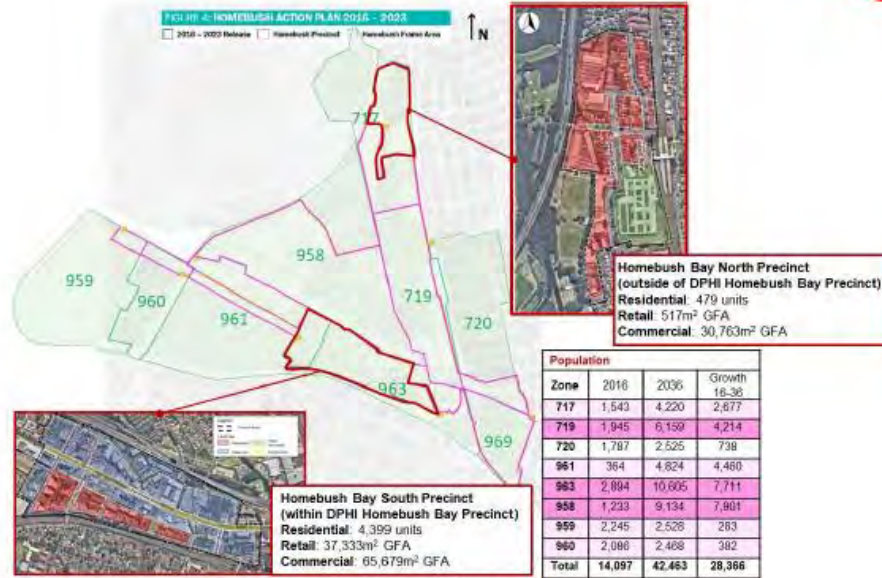


Figure 1.1: PRCTTS Growth Input Assumptions (City of Canada Bay)

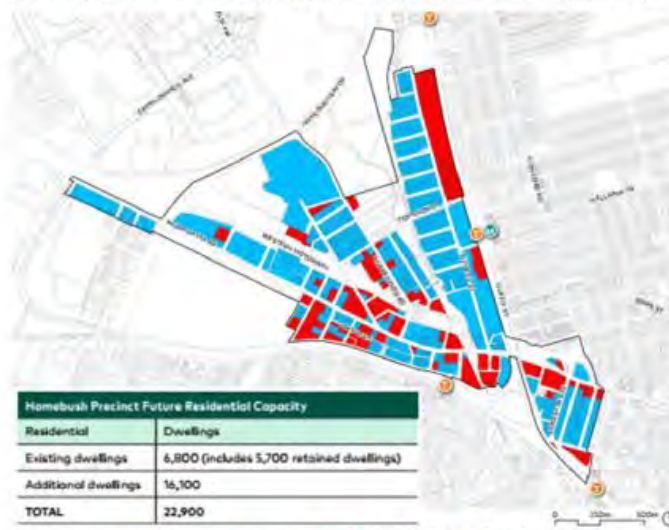


Figure 1.2: Homebush Precinct UDR Residential Capacity



Figure 1.3: Comparison of PRCUTS and UDR FSRs

Section 5.4 of the *PTS* quotes a 2036 population of 21,622 in the TOD master plan and identifies that this is lower than the 2036 *PRTTAP* population of 30,595 for the same TOD precinct area and hence the modelling used in the *PRTTAP* is suitable for assessing the *PTS* for 2036.

It is relevant to note however that the 2036 modelling for the *PRTTAP* was based on the full buildout of the study area for that study but with background traffic (outside of the study area) at 2036 levels. The *PTS* assessment was based on expected 2036 development levels which were estimated at 46% of the full buildout of the TOD precinct proposal.

The *PTS* has not undertaken an assessment of the impacts and needs of the full buildout scenario which would equate to about double the locally-generated transport demands of those considered in the *PTS* and double the 2036 traffic volumes considered in the *PRTTAP*.



2. Transport Strategies

2.1. PRTTAP Future Transport Issues Summary

The *PRTTAP* accounted for Sydney Metro West in its strategies for the Homebush North and Homebush South precincts. This means that when TfNSW ran its regional strategic model for *PRTTAP*, it included the then-proposed Metro West project influence on modal share and hence on the resulting traffic demands to/from and through the corridor.

Key 'full buildout' traffic and transport issues revealed in the *PRTTAP* modelling relevant to the Homebush TOD Precinct included:

- The key controlling pinch point in the Homebush area was identified as The Concord Road/Parramatta Road/Leicester Avenue intersection. In the modelling, this intersection generated very long queues eastbound along Parramatta Road in the 2036 morning peak and 'gated' traffic in the PM peak with very long queues generated westbound back from the intersection
- Parramatta Road through the Homebush Precinct was unable to carry the 2036 traffic demand growth forecast for it (e.g. over 1,000 vehicles in excess of capacity in the morning peak eastbound) meaning either exceptionally long delays to east-west and west-east traffic or relocation of this east-west traffic to other modes, destination or routes.
- More congestion and longer queues on all approaches of the (already congested) George Street / Parramatta and Underwood Road / Parramatta Road intersections partly due to the extra traffic generated by the redevelopment growth in the catchments of Underwood Road and George Street and partly due to heavy prevailing congestion in Parramatta Road by 2036. Queues were forecast to extend northwards beyond Pomeroy Street, the primary east-west support route for this area, with excessive congestion along the extents of Pomeroy Road
- Very heavy local road congestion in Bridge Road, The Crescent and Loftus Crescent, stemming back from Parramatta Road intersections because of the much greater demand imposed at these intersections from the Homebush South precinct coupled with increasing traffic demand along Parramatta Road anyway
- Insufficient local bus routes to service Homebush North to the north of Parramatta Road and to service the Bridge Road (Homebush South) growth catchment south of Parramatta Road
- Poor active transport accessibility to, from and along Parramatta Road as well as east-west for local movements within Homebush Bay North and north-south within with Homebush South, particularly given the rail line as a key barrier.

2.2. PTS Transport 'Challenges' and 'Opportunities'

The *PTS* identified a number of generic traffic and transport challenges for the network, as follows:

- Barriers to creating an efficient and connected network
- Local access on precinct roads and streets (reference much of the work of the PRCTTS)
- Disjointed active transport network
- Limited bus services supporting rail and future metro and for local trips
- Inefficient use of the existing road capacity
- Inadequate streetscape amenity and liveability

The key opportunities described in the *PTS* to address the above challenges primarily related to reducing private vehicle usage and substantially increasing public and active transport usage. Most opportunities stated related to significantly shifting modal share from private vehicles to walking, cycling and public transport by reducing car dependency, reducing traffic capacity and increasing public transport and active transport facilities. The scale of potential modal shift was not identified.



2.3. Comparison of Strategies (PRTTAP v PTS)

The *PRTTAP* identified that with the full buildout of the study area, it would be inevitable that some of the growth in traffic demand through the study area would avoid it because delays would be excessive. Even with the removal of some through traffic growth, a number of key pinch point improvements were identified as being necessary in the *PRTTAP* to reduce the excessive impacts of growth in traffic on the local network. These impacts included very long delays on side streets to Parramatta Road meaning very long travel times for local movements between Homebush North and Homebush South.

The *PRTTAP* also recommended new walking and cycling links for its study area, potential new bus route locations and potential development parking rates for the uplift areas under investigation in the Homebush North and the Homebush South precincts.

The *PTS*:

- Heavily emphasised additional walking and cycling infrastructure and local street calming changes to improve the street environment for walking and cycling
- Took on board the intersection 'capacity' upgrade recommendations from the *PRTTAP*
- Recommended some additional local road links compared to the *PRTTAP* primarily for local accessibility purposes
- Recommended a large number of 'quietways' on short streets where narrow lanes could be implemented and traffic speeds could be reduced to 30 km/h
- Included 'prioritised' and 'aspirational' walking and cycling links at a greater level of granularity than included in the *PRTTAP*
- Identified that "a redefined bus network should be considered in line with the precinct growth and transformation. This should be developed in coordination by TfNSW, Sydney Metro and councils" without identifying any specific routes, as were nominated in the *PRTTAP*
- Documents the *PRCUTS* parking rates and recommends those rates as the development parking rates to adopt for the Homebush TOD precinct.

Overall, the *PTS* transport strategy relies far more heavily on aspirational modal shift towards walking and cycling than the *PRTTAP* did and has far less emphasis in managing the impacts of congestion on the local road network.

Also, the *PTS* has no consideration of local road congestion beyond 2036 (i.e. beyond 46% of full buildout). Without consideration of the full buildout scenario, it is possible that an insufficient number of local road connections will be allowed for in the master plan.

Furthermore, transport impacts and needs to, from and along Parramatta Road post-2036 have not been quantified. This includes the level of modal shift that would be necessary to ensure excessive congestion did not occur if the road space reallocation proposal for Parramatta Road (to public transport) and the full development of the TOD precinct were both realised. Such an assessment is necessary to validate if the vision for far greater residential development than previously anticipated coupled with reduced road capacity could be pragmatic outcome rather than just being an aspirational vision.



3. Transport Infrastructure Projects

Appendix A of the *PTS* includes tables of 'Transport Response Interventions' to the Master Plan. It is important to note that based on the assessment methodology, these actions only relate to 46% development of the full buildout of the Master Plan.

A review of the key action items, with consideration of the findings of the *PRTTAP*, are:

- **Environmental interventions:** Primarily related to new crossings and traffic calming methods (including *quietways* and *shared zones*) throughout the TOD precinct to improve the safety and amenity of pedestrian and cyclist movements. These are logical interventions where more walking and cycling is expected.
- **Walking and cycling interventions:** Most of the recommended walking and/or cycling links were sourced from previous studies and have a sound network connectivity basis for them. For new items identified in the *PTS* it is unclear what items under Action R2.13 (*Provide a new active transport link*) mean in terms of new or upgraded on-road or off-road infrastructure, particularly given that a lot of the items listed already have pathways. More specificity as to the intended infrastructure would provide clarity to this action item. The *PAMP* recommended under Action R2.15 is reasonable but it will be challenging to establish definitive actions within it given that the TOD precinct will be changing significantly with redevelopment.
- **Traffic interventions:** All of the *PRTTAP* recommendations within the TOD area are sourced in the *PTS* except for the proposed new right turn from Parramatta Road into Knight Street. Whilst this right turn has significant local accessibility merit, it is understood the *TNSW* is not supportive of this initiative. The other initiatives raised in the *PTS* are mostly for improved local access and seem logical and are unlikely to generate any significant new local 'rat-running' issues.
- **Parking interventions:** The proposed parking rates are consistent with *PRCUTS* and align with the overall approach of attracting residents into the area with a lower reliance on private vehicles and greater reliance on walking, cycling and public transport.



4. Conclusions and Recommendations

4.1. Key Conclusions

The Homebush TOD is estimated to result in nearly 23,000 dwellings within the precinct. The PTS has limited its transport needs assessment to approximately 46% of this development (expected by 2036) meaning that the traffic capacity needs findings of the PRTTAP are comparable to those of 46% of the full buildout of the TOD. No meaningful metrics-based consideration has been given to the 'master planning' of the transport needs of the remaining 54% of the TOD precinct.

At a little more than 46% of the TOD precinct's development level, the PRTTAP identified a severely congested local traffic network even after assumptions were made that a high degree of through traffic would be re-routed outside of the corridor. More local road links and greater management of the interfaces between local streets and Parramatta Road (e.g. turn bans, clearway length extensions, more intersections etc.) would be expected after 2036 and should be identified in a Transport Master Plan for a full development scenario.

Furthermore, whilst the *vision and validate* approach is recognised as the prevailing assessment approach, this does not mean that the potential risks associated with a selected *vision* should not be contemplated at all in the Master Plan; that is, not be *validated*.

The proposal is to double local travel demand to/from the Homebush TOD precinct compared to what was assessed in the PTS and at the same time to re-allocate road space on Parramatta Road to public transport. These proposals in combination suggest a substantial modal shift from current usage levels would be essential.

The quantity of modal shift required to walking, cycling and public transport (compared to current modal shares) should at least be validated in the PTS to understand if the scale of change is feasible, or if not achievable, how it may be counter-productive to attracting the scale of housing development targeted in such an area as Homebush. Further modelling / analysis would be needed to validate the pragmatism of the vision at full build out including as well as for understanding public transport capacity needs which have not been considered in the PTS.

4.2. Recommendations

It is recommended that Council respond to the Homebush TOD proposal noting that:

- *The scale of development proposed at full buildout of the Homebush TOD is about double what has previously been assessed for the area by any study. The full development vision and its associated transport actions included in the PTS should be modelled to validate that the shift in modal share away from private vehicle usage needed across all trip purposes and all trip destinations is foreseeable. Such an analysis should consider trips and modal shares to, from, within and through the precinct and should benchmark the required modal shares against developed centres in similar contexts elsewhere.*

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Bitzios'.

Damien Bitzios
Director
M ENG | B ENG (HONS) | FIEAUST | FAITPM | RPEQ
BITZIOS CONSULTING