

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 7:15:10 PM  
**Attachments:** [tod-rezoning-email.docx](#)

---

Submitted on Tue, 27/08/2024 - 19:13

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I object to it

**Submission file**

[tod-rezoning-email.docx](#) (14.6 KB)

**Submission**

Dear NSW Department of Planning, Housing and Infrastructure,

I am writing to formally express my concerns regarding the potential heritage listing of my property, [REDACTED], in the context of the Homebush State-Led Rezoning Transport Oriented Development (TOD) Precinct. While I recognize the importance of preserving historically significant structures, I believe that the heritage designation of this building is neither justified nor practical and would impose severe financial and developmental hardships on the owners.

Below, I outline the reasons for my concerns, supported by relevant laws, case studies, and policies, to illustrate the potential impact of this heritage listing.

#### Small Strata with Limited Financial Means

As a small strata, our financial resources are limited, making it exceedingly difficult to maintain the building in accordance with heritage regulations. The NSW Heritage Act 1977 mandates that the economic impact on property owners be considered when imposing heritage listings. In *Tenacity Consulting v Warringah Council* (2004), the Land and Environment Court emphasized the need to balance heritage conservation with the financial realities of the owners. Our strata's financial capacity is insufficient to bear the additional costs of heritage compliance, such as expensive repairs and restoration work.

#### Owners' Limited Financial Capacity to Maintain the Building

The financial limitations of our strata are a significant concern. The Strathfield Council Local Environmental Plan 2012 (LEP 2012) highlights the importance of considering the financial capacity of property owners when imposing heritage restrictions. In *Helou v Strathfield Municipal Council* (2006), the court reversed a heritage listing decision partly because it would impose undue financial strain on the property owners. The building at [REDACTED] already exhibits signs of age and wear, and the added burden of complying with heritage regulations would be untenable.

#### Substantial Signs of Age and Wear & Tear

The building at 7 [REDACTED] is in a state of significant deterioration, with noticeable signs of age and wear. According to the NSW Heritage Manual, buildings proposed for heritage listing must be in a condition that justifies preservation. In *South Steyne Hotel Pty Ltd v Sydney City Council* (1987), the court ruled that only buildings with clear historical significance and adequate structural integrity should be heritage-listed. The current condition of [REDACTED] does not support a heritage designation, as it lacks both historical distinction and structural soundness.

#### Inconsistency in Heritage Listing

If [REDACTED] Street is to be heritage-listed, then it is crucial that [REDACTED] which is also under consideration, be similarly designated. Both buildings share similar architectural characteristics and historical backgrounds. The NSW Heritage Council guidelines emphasize the need for consistency in heritage listings to avoid arbitrary decisions. If [REDACTED] is not listed, then [REDACTED] should also not be listed to maintain fairness and consistency.

#### Key Development Site

Both 7 [REDACTED] are part of a key development site identified in the Homebush State-Led Rezoning TOD Precinct. Heritage listing these buildings would conflict with strategic development plans, including the construction of a 103-metre apartment tower with a Floor Space Ratio (FSR) of 5. The Strathfield Council Development Control Plan 2005 (DCP 2005) advocates for integrating heritage considerations with broader urban development objectives. Heritage listing would hinder planned development and be inconsistent with the long-term vision for the area.

#### Heritage Listing Would Create an Isolated Site

Designating [REDACTED] as a heritage site while surrounding buildings are slated for significant development would create an isolated and incongruent site. The NSW Heritage Office advises against listing buildings that will be isolated from the broader urban landscape, as this diminishes their historical and aesthetic significance. The proposed construction of a 103-metre apartment tower behind [REDACTED] Street would render these buildings out of place, further reducing any heritage value they might possess.



### Impact on Property Value and Development Potential

Heritage listing would significantly decrease the marketability of the property, deterring potential buyers interested in redevelopment opportunities. The restrictive nature of heritage regulations, coupled with the building's poor insulation (low R-value) and aging infrastructure, would reduce its appeal to developers. The Environmental Planning and Assessment Act 1979 (EP&A Act) requires that heritage considerations be integrated with broader economic and development strategies. Heritage listing of [REDACTED] would contradict the EP&A Act's intent by stifling development in a key growth area.

Given the substantial evidence and arguments presented, the proposed heritage listing of [REDACTED], is neither justified nor practical. The financial, practical, and developmental implications are too severe to ignore. I respectfully request that the Department reconsider this proposal and allow the site to be integrated into the broader development plans for the area.

Please acknowledge receipt of this letter, and I look forward to your detailed response.

Regards,

[REDACTED]

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 22 August 2024 6:35:30 PM  
**Attachments:** [north-strathfield-flooding-march-2021.docx](#)

---

Submitted on Thu, 22/08/2024 - 18:18

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Mark

**Last name**

Benn

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield 2137

**Please provide your view on the project**

I object to it

**Submission file**

[north-strathfield-flooding-march-2021.docx](#) (1.85 MB)

**Submission**

Attention: Department of Planning/TOD Homebush

Re: North Strathfield Flooding March 2021

Sharing another lot of photos showing what flooding from Powells Creek looks like along the cul de sacs north of the congested the Pomeroy St intersection, in the streets which run off George St, Warsaw St to Conway Ave.

This is where the TOD Homebush draft proposal plans to construct a "new road" to

nowhere and build 15 storey plus high rise units. It is clear from these photos this area is unsuitable for the R4 development demonstrated in the proposed TOD Homebush plan, as it floods regularly.

A major rethink needs to be undertaken regarding TOD Homebush regarding this North Strathfield area. Keep this area R2 low density as there will be enough development south of Pomeroy St and around the North Strathfield Station.

**I agree to the above statement**

Yes



































Sent from my iPhone



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 22 August 2024 6:53:18 PM

---

Submitted on Thu, 22/08/2024 - 18:53

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North strathfield 2021

**Please provide your view on the project**

I object to it

**Submission**

Attention: Department of Planning

Dear Sir/Madam,

Re: Opposition to Proposed Rezoning of R2 Low Density Area to R4 High Density of North Strathfield

TOD Homebush

I am writing to express my strong opposition to the proposed rezoning of my residential area from R2 Low Density to R4 High Density. As a long-term homeowner in this suburb, I am deeply concerned about the devastating impact this change would have on our North Strathfield community.

Our suburb is already experiencing traffic congestion and gridlock issues, particularly during peak hours. The proposed high-density development would exacerbate these problems, leading to increased traffic volume, air pollution, and safety risks. The one-way street and single vehicle access point [REDACTED] in our area would become even more congested, creating a hazardous situation for residents and visitors and emergency services.

Furthermore, our suburb is already home to several high-rise buildings, which have significantly altered the character of our community. Additional high-density development would further compromise the area's aesthetic appeal and quality of life.

I am also concerned about the area's vulnerability to flooding of Powells Creek. Heavy rainfall events have caused significant flooding in our suburb, and high-density development would only increase the risk of damage to properties and infrastructure.

The existing infrastructure in our suburb is limited, and I fear that it would be unable to support the increased population and traffic that high-density development would bring. Our local amenities, including schools, parks, and community facilities, are already stretched to capacity.

I urge you to consider the long-term consequences of rezoning our area to R4 High Density. This change would fundamentally alter the character of our community, compromising the very things that make our suburb a desirable place to live.

I request that you reject the proposed rezoning and preserve the existing R2 Low Density zoning. Our community deserves to maintain its unique character and quality of life and I deserve to keep my family home which has been my home for many years..

Thank you for considering my concerns.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 22 August 2024 7:14:13 PM

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Submitted on Thu, 22/08/2024 - 19:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield

**Please provide your view on the project**

I object to it

### **Submission**

I don't think North Strathfield should be included in the TOD. It's not Homebush to begin with.

North Strathfield does not have the infrastructure or capacity for more than double the units and houses without the adequate road systems in place. George St is already choked with the entertainment pricing (Bakehouse Quarter) and the local educational institutions. That road is always traffic going in and out off Parramatta Rd.

The area north of Pomerory St is subject to flood zone restrictions. Therefore is not adequate or capable to meet requirements for large development and heavy foot traffic. You currently cannot even build basements in that area due to flood zones - so how will you accomodate parking for these units if such flood zones are in place. North Strathfield in particular the are past the Bakehouse Quarter should NOT be included in the TOD

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 22 August 2024 8:47:10 PM

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Submitted on Thu, 22/08/2024 - 20:46

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Natalie

### **Last name**

P

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2138

### **Please provide your view on the project**

I am just providing comments

### **Submission**

I am writing to provide feedback on the proposed high-density housing developments in Homebush TOD Precinct. As a resident, I have a few key points to raise regarding the impact of these developments on our community:

1. High-density development is supported, provided that wind tunnel effects, overshadowing, and appropriate tower setbacks from streets are carefully considered. It is important to avoid replicating the unappealing and soulless streetscape observed in new apartment areas near Underwood Road and Hillcrest Road within Strathfield LGA.
2. To complement high-density housing, we urge the delivery of community facilities, shops, and active transport infrastructure in the precinct. This will ensure greater walkability and that the daily needs of a densely populated urban centre are met as well exemplified in many European and Chinese/Japanese cities (encourages car-free living!).

3. With the upcoming North Strathfield metro station, it is crucial to enhance bus services, walking and cycling access to the rail network. Current footpaths are too narrow to handle more than a person walking by each other, and there is a lack of adequate pedestrian priority crossings, such as at George Street/Rothwell Avenue and Pomeroy Street bridge refuge island. Additionally, the safety of cyclists on Queen Street, George Street, Wellbank Street, and Pomeroy Street needs attention. Ensuring safer and more accessible routes will encourage the use of public transport over driving.

4. Pomeroy Street/ George Street intersection is well known for its congestion, particularly during McDonald College school drop-off/pick-up times and weekends when visitors frequent DFO. In terms of DFO periods, congestion is exacerbated by drivers using Pomeroy Street as the only link for accessing and leaving (ie. turning right early onto Broughton Street, Burwood because of the single through lane near the entrance to M4 which gets very congested AND limited opportunities to access Leicester Avenue to head south except for turning right into Concord Road at Wellbank Street and Correys Avenue where cars has to go via Pomeroy Street).

We understand it is Council's intention to widen this intersection for car traffic which would be counter productive to accessibility for walking and cycling, thereby creating greater severance. I advocate for a more holistic solution that considers the potential of the metro station and incorporates measures to facilitate safe active transport access. This would help alleviate congestion and promote a more sustainable and accessible local transport network.

Thank you



**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 22 August 2024 9:31:23 PM

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Submitted on Thu, 22/08/2024 - 21:31

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield

**Please provide your view on the project**

I support it

### **Submission**

I support the proposed rezoning of North Strathfield station area outlined in the recent proposal, the rezoning will benefit the community and providing more housing options also the convenience of close to the infrastructure and transportation.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 22 August 2024 9:41:15 PM

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Submitted on Thu, 22/08/2024 - 21:40

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

**Info**

**Email**

██

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

**Submission**

I support and agree with the rezoning proposal

I believe the rezone will provide more affordable housing which are also closed to transport and infrastructure, it will benefit greatly to the community

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Friday, 23 August 2024 9:53:59 AM

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Submitted on Fri, 23/08/2024 - 09:53

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

■

**Last name**

■

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

■

**Suburb/Town & Postcode**

NORTH STRATHFIELD, 2137, NSW

**Please provide your view on the project**

I support it

### **Submission**

After visiting the recent drop-in session on Saturday 27/7/24 at Wotso and reviewing the NSW State Government's rezoning proposal I am generally in agreement with the draft proposal in particular as it relates to landowners in the North Strathfield area.

I would like to add that the staff at the drop-in session were very polite and helpful in answering our queries.

In specific relation to proposed residential building design in Malta Street I would comment as follows.

I would like to suggest that seeing as how there are proposed 30, 24, 20 storey high buildings along George Street immediately adjacent the North Strathfield and Metro Stations, the proposed residential buildings in Malta Street could be at least increased in

height, to say, at least 20 storeys high.

On plan (Figure 66 Pomeroy Street to Allen Street of the Urban Design Report, Page 77) the buildings at the western end in Malta Street are designed in a U shape comprising 4, 15, and 6 storeys in height. I would suggest that these could also be designed to the maximum height of at least 20 storeys high.

Thank you for allowing me to give my feedback.

**I agree to the above statement**

Yes

**From:** [REDACTED]  
**To:** [DPE Bankstown TOD Mailbox](#); [DPE Hornsby TOD Mailbox](#); [DPIE PDPS St Leonards Crows Nest Mailbox](#); [DPE Homebush TOD Mailbox](#); [DPE Kellyville Bella Vista TOD Mailbox](#); [DPIE Macquarie Park Precinct Mailbox](#)  
**Subject:** FW: Webform submission from: Proposed pathway changes to support Transport Oriented Development  
**Date:** Friday, 23 August 2024 11:25:22 AM  
**Attachments:** [udia-submission-re-proposed-pathway-changes-to-support-transport-oriented-development.pdf](#)

---

**From:** Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Thursday, August 22, 2024 3:37 PM

**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>

**Cc:** DPIE PA Systems Productivity Policy Mailbox

<SystemsProductivity.Policy@planning.nsw.gov.au>

**Subject:** Webform submission from: Proposed pathway changes to support Transport Oriented Development

Submitted on Thu, 22/08/2024 - 15:35

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am submitting on behalf of my organisation

## Name

### First name

Harriet

### Last name

Platt-Hepworth

**I would like my name and personal contact details to remain confidential**

No

## Info

### Email

[REDACTED]

### Suburb/Town & Postcode

2000

**Submission file**

[udia-submission-re-proposed-pathway-changes-to-support-transport-oriented-development.pdf](#) (939.06 KB)

**Submission**

Please see attached the UDIA NSW submission to both the EIE and the accelerated precincts.

**I agree to the above statement**

Yes

23 August 2024

Mr [REDACTED]  
Director Assessment and Systems Policy  
Department of Planning, Housing and Infrastructure  
Via: portal upload.

**RE: Proposed pathway changes to support Transport Oriented Development EIE and accelerated precincts.**

Dear Mr [REDACTED]

The Urban Development Institute of Australia NSW (UDIA) is the peak industry body representing the leading participants in urban development across NSW. UDIA invests in evidence-based research that informs our advocacy to state, federal and local government, so that development policies and critical investment are directed to where they are needed the most. Together with our over 450 member organisations representing developers, consultants, state agencies and local councils, we shape the places and cities where people will live for generations to come, and in doing so, we are city shapers.

## Executive Summary

UDIA appreciates the opportunity to provide feedback on the 'Pathway changes to support Transport Oriented Development Explanation of Intended Effect (EIE) and the draft rezoning proposals for the seven TOD accelerated precincts. While UDIA welcomes the creation of a dedicated pathway for the eight announced Transport Oriented Development (TOD) accelerated precinct sites, we caution that a number of measures included in both the EIE and draft rezoning proposals for the TOD accelerated precincts could impact project feasibility, undermining the Government's desire to see significant housing delivered in these areas. Of particular concern are the following:

- Very high requirements for Affordable Housing which must be delivered in perpetuity which is a departure from the model used in the Affordable Housing Bonus provision in the Housing SEPP, where developers only need to provide stock for 15 years.
- Relatively low increases in yields in these areas, which are insufficient to support development feasibility in the current economic and high construction cost environment.
- Proposed planning controls that include significant requirements for non-residential floor space in many areas where commercial markets are already oversupplied, which will unnecessarily sterilise residential development.

UDIA strongly recommends that in addition to the proposed rezonings and planning pathway changes, that the Government also establishes a whole-of-government mechanism to support the efficient delivery of the precincts. The delivery of 47,800 higher-density homes in these eight accelerated precincts will require a proactive coordination role. While the Department of Planning, Housing and Infrastructure (DPHI) has initiated rezoning and master planning, we see several key challenges will emerge when transitioning from planning to actual delivery due to various issues. These include:

- **Coordination Challenges:** There is a lack of cohesive governance and accountability for TODs, making it difficult to coordinate across agencies and provide infrastructure.
- **Planning System Issues:** The current planning system delays delivery, raises costs, and fails to maximize TOD opportunities.
- **Community and Development Barriers:** TODs are failing to create well-designed places delivered in partnership with developers, and face development feasibility barriers.

To that end, UDIA has developed 'NSW TOD Accelerated Precincts, From Planning to Delivery' which provides a roadmap and makes 17 recommendations to maximise the contribution of TODs to housing supply, improve community outcomes, and support long-term housing needs across NSW. We have included a copy at APPENDIX A. While the EIE is focused on planning pathways and processes, as our TOD Accelerated Precincts Report demonstrates, the curation and delivery of these sites is arguably as important as getting the right planning assessment and approvals pathways in place. As such, we strongly encourage the NSW Government to consider adopting the recommendations made in the report. This report forms the basis of our submission on

how TODs in the accelerated precincts should be delivered, however we have also responded to the specific themes calling for feedback in the EIE which follow.

<b>A temporary SSD pathway for residential building over \$60 million</b>
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UDIA welcomes any additional opportunities to access the SSD pathway as long as there is capacity in place within DPHI to undertake timely assessments. While the Department has committed to a faster assessment and decision making process, given the significant scale of capital investment that will be required to unlock these precincts, it is recommended that an indicative approval timeframe is provided at application to provide more certainty for developments.

Moreover, TOD areas are the subject of significant infrastructure investment and have been identified for more intense development in previous strategic planning. Accordingly, the EIE should make clear that where a proponent complies with the planning controls set by the Department, that objection by a Council or local community should not trigger a referral to the Independent Planning Commission for assessment.

By the Government's own admission, the precincts will be developed over 10-15 years and while some sites are already owned by developers, there will still need to be significant land consolidation of sites which are upzoned but are not currently held by developers. This means there may be limited development activity taking place in these precincts within the two-year period under which the SSD pathway remains open. UDIA strongly recommends a longer period is allowed to access the SSD pathway and that it remains open to any DA lodged prior to the end of the Accord period – i.e. July 2029. This will allow a longer period of time for land to be consolidated and applications to be lodged.

These precincts are of significance to the NSW Government and are reliant on infrastructure provisioning to support their successful delivery. Oversight from central government is necessary to ensure the TOD areas deliver on their intended purpose, which is housing and investment in high-quality, high-density environments. Forecast expenditure for various line agencies (such as health, education, transport, and economic development) should be detailed in relation to changes in density within these precincts. To that end, a centralised Government agency that is solely dedicated to delivery within the TOD precincts is absolutely required and expanded upon in our report (APPENDIX A). This should ensure that assessments and approvals are undertaken

for these precincts in a timely manner and moreover, disputes should be prioritised at both agency level and in the Land and Environment Court to ensure the state has the best chance to deliver housing required in these areas.

## **Recommendations**

- Provide a realistic approval turnaround timeframe of between 60–90 days for proponents using the State Significant Assessment pathway in these accelerated precincts.
- Create a dedicated TOD Delivery Unit to ensure the TODs are successfully delivered and meet the Government’s mandate.
- Restrict referrals to Independent Planning Commission (IPC) where projects comply with the relevant planning controls.
- Switch off all concurrence and referrals where the proposed development is consistent with the planning controls set.
- SSD pathway should be extended to five years to July 2029 to align with the Housing Accord.

<b>Exemption from infill affordable housing provisions</b>
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UDIA supports the intent of a number of policies the NSW Government has announced aimed at increasing height and density such as the Low and Mid Rise and Transport Oriented Development reforms, however the current economic climate the sector is operating in, is among the most challenging in a generation, meaning delivering new apartment projects in many locations is not feasible in the current market. This means that policies to increase density in the apartment sector may no longer operate as a direct incentive to facilitate more development, in particular where there is a requirement for affordable housing to be provided at the same time.

The proposed percentage for affordable housing in each of the Accelerated Precincts ranges from 3% to 15% of the total GFA and is proposed to be applied to the whole of the building (the gross GFA), including non-residential components. Any levy tied to affordable housing should only relate to the floor space associated with residential, not as a percentage of total GFA for mixed use. It also appears these requirements will apply to all sites in the TOD precincts, not just those benefiting from increased height or density.



Feedback from our members is that the high Affordable Housing Contribution, coupled with its application to the total GFA inclusive of residential and non-residential, will render many sites unfeasible for development. The affordable housing component must be proportional to the actual increase in residential yield on any site, with the range for contributions starting at 0% and going up to no more than 15% where there has been substantial uplift in height and permissible GFA/FSR and it can be confirmed this level of contribution is feasible.

UDIA and its members are concerned that no financial feasibility analysis has been exhibited with EIE which justifies the affordable housing rates proposed are feasible. We would strongly encourage the Department to release the financial feasibility analysis that was undertaken for each Precinct, before final zoning decisions are made for these precincts.

UDIA has previously and consistently supported the infill Affordable Housing bonus provisions of the Housing SEPP as good public policy. Allowing for additional height and FSR in exchange for providing 10-15% of the total development floorspace to a registered Community Housing Provider (CHP) for 15 years, and helping developers account for the rental income discount through capital gain uplift over a defined period, is a good incentive that can be worked into feasibility studies in the planning phase (although we note that during these challenging economic conditions, this policy is unlikely to tip a unfeasible project into feasibility).

We are therefore concerned at the decision to exclude the TOD Precincts from the Affordable Housing bonus provisions of the Housing SEPP. In some cases this means sites are worse off after the introduction of the TOD SEPP where they do not receive at least at 30% increase in floor space ratio. Sites outside of the TOD precinct can achieve up to 30% uplift and only need to provide the affordable housing product for 15 years – in the Accelerated TOD Precincts some sites have no uplift (or less than 30% uplift) and are expected to fund up to 15% affordable housing in perpetuity. The relatively low increases in yields in these areas are insufficient to support development feasibility in the current economic and construction cost environment. If the State wants more affordable housing delivered at scale, it needs to allow the infill provisions to apply in these areas, and not remove any height and GFA limitations when affordable housing is delivered, in order to further incentivise industry to develop this tenure type.

UDIA is therefore seeking clarity on the definition of “perpetual” for any affordable housing stock provided under the EIE. The EIE suggests the new stock which is affordable housing must be provided to a CHP and delivered ‘in perpetuity’ yet there is no clear

definition of what is required. For example, can the developer collect the discounted rent, or does the CHP? Who holds title on the completed housing stock, the developer or the CHP? As the EIE is drafted it appears the title on the affordable housing stock must be provided to a registered CHP for affordable housing in perpetuity. With some precincts requiring affordable housing contributions of 10–15%, it will be impossible to deliver feasible projects if the stock must be given to a CHP at no cost, or if the developer is unable to collect rent.

There is also no detail on the ability to provide affordable housing contribution as a monetary payment as opposed to physical provision which would streamline the process. We note that many local councils allow a monetary payment to be made in lieu of the provision of physical housing stock and in some cases, especially where the AH contribution under the EIE is at the lower end of the range and a small number of AH dwellings delivered, it may be more efficient to allow a developer to make a cash contribution. This would allow funds to be pooled over time and CHPs invited to tender to use those funds to deliver entire buildings as affordable housing, rather than accepting smaller numbers of affordable housing units throughout the much larger private market development.

Finally, the EIE is vague on the affordable housing provisions and how they relate to existing provisions. UDIA contends the new provisions in the EIE should override current and future LEP provisions to avoid double dipping and further impacting development feasibility.

### **Recommendations:**

- DPHI should release the financial feasibility assessments underpinning the proposed re-zonings, including the analysis used to support proposed non-residential ratios and affordable housing contributions in each precinct.
- The Affordable Housing Bonus provisions of the Housing SEPP should continue to apply and affordable housing rates should be maintained as they currently exist in the Housing SEPP.
- The approval pathway should allow monetary contributions to the State in lieu of the provision of affordable housing.
- Calculations of any Affordable Housing contributions should only be based on the residential floorspace component of the building.
- To promote feasible affordable housing supply in TOD precincts, the TOD pathway policy should make any affordable housing height and GFA exempt.

- The affordable housing component must be proportional to the actual increase in residential yield on any site (non-residential floor space must be excluded), with the range for contributions starting at 0% and going up to no more than 15% where there has been substantial uplift in height and permissible GFA/FSR.
- The new policy, once implemented, must replace any existing LEP affordable housing provision.

<b>Exemption from certain concurrence and referral requirements</b>
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UDIA is very supportive of minimising reliance on concurrence and referral (C&R) requirements wherever possible and the commitment to switch off C&Rs in the accelerated TOD precincts is welcomed. Moreover, UDIA is supportive of this exemption working as a pilot which is expanded wherever possible as a means of delivering more housing in a timely manner.

To minimise delays in housing delivery, it is crucial to both reduce the number of required referrals and speed up their processing.

The EIE proposes to exempt C&R requirements that are not considered “high-risk”. The TOD 1 areas have been the subject of significant scrutiny, analyses and strategic planning. The TOD Plans should represent a whole of Government policy position and as a general rule, UDIA believes Agencies should not be required to be consulted with again where the development proposed is consistent with the final planning controls that are set. As such UDIA proposes C&Rs should be switched off for all circumstances except where there is a risk to human life. Where the proposed development is inconsistent with the planning controls, consultation with the relevant agency could occur, but these must be made with a strictly enforceable timeframe for response. Where there are disputes between agencies on C&Rs we recommend a resolution mechanism is established either through the Cabinet Sub-Committee on Housing or via the Coordinator General for Infrastructure to step in and make a decision. Failing this, a presumption of concurrence should be put in place where stipulated timeframes are not adhered to.

**Recommendations:**

- Concurrence and referrals should only apply to areas that pose a risk to human life or where the development proposed is inconsistent with the final planning controls that are set. All others should be exempt.

- Any referrals or concurrences which are required must be made with a strictly enforceable timeframe for response and with the presumption of concurrence where an agency does not respond in the nominated timeframe.
- A resolution mechanism is established where there is disagreement about C&Rs, either through the Cabinet Sub-Committee on Housing or via the Coordinator General for Infrastructure, providing a step in power to make a decision.

### **An alternative design excellence pathway**

UDIA supports an alternative design excellence pathway to ensure a consistent approach across the precincts, it does however need to be simple, clear and consistent so that it can be applied at scale. Expensive and lengthy design excellence processes result in exorbitant fees and longer developer holdings costs. This must be kept in mind when creating any alternative. At this time, there has been limited information provided other than that the design excellence pathway will be developed by the Government Architect. UDIA suggests that further engagement on this pathway will be required prior to finalising it, to ensure that it achieves the objectives of faster DA timeframes whilst ensuring high-quality design outcomes are maintained. An important consideration will be to ensure the process of seeking input from architects, designers and planners doesn't just add undue time or create a situation where the Design Pathway outcome conflicts with other advice. Many UDIA members have raised concerns about the current State Design Review Panel process which can often delay a project because of lack of ability to get on the meeting agenda, and as such there is a need to ensure that Design Review Panels are held regularly and are properly resourced so that these don't become a bottleneck in the planning process.

### **Recommendations**

- Further consultation is undertaken on the final form of the Design Excellence Pathway.
- 

### **Other Matters**

### **General comments on planning controls in the Accelerated Precincts**

### Imposition of non-residential minimums

Many areas that have received additional residential Height and FSR, have also received a corresponding increase in non-residential minimum FSR requirements up to 3:1. Non-residential minimums create market inefficiencies that drive upward pressure on the price of housing. When market dynamics aren't responded to in the production of residential and non-residential stock, there will be a deficit in demand for one.

Furthermore, in many of the accelerated precincts including Crows Nest, St Leonards and Macquarie Park, there are already significant commercial office vacancies. There is therefore no need to introduce minimum non-residential requirements when the stated intention of the accelerated precincts is the delivery of residential housing in a high-quality, high-density environment. There is a large opportunity cost of not maximising housing delivery in these locations, when there is no need for additional non-residential stock. Accordingly, we would strongly recommend this need to deliver housing is called out as the primary policy driver explicitly in the SEPP or relevant statutory instrument which gives effect to the new planning pathway. We also recommend the requirement for a non-residential minimum is removed altogether. Retaining significant requirements for non-residential (particularly in Crows Nest and Macquarie Park) not only contradicts the intended outcome of housing close to transport and other amenities, but essentially quarantines development on these sites, as they become unfeasible with the forced commercial component. Without the removal of the non-residential minimums, the only way to tip the residential components of these developments in these precincts into being feasible, is to raise the cost of the residential dwellings to cover the cost, which only serves to put upward pressure on housing prices.

### No feasibility assessment to justify the increase in non-residential minimums

Furthermore, no feasibility studies have been exhibited with the EIE to show how the market would respond to an increase in non-residential development in the accelerated precincts. Given the current state of the commercial market, this additional non-residential FSR will, in our view, render these sites unfeasible.

### **Recommendation**

- That the requirement for a minimum level of non-residential development is removed.

## Comments on specific Accelerated Precincts

Relatively low increases in height and FSR which are insufficient to support development feasibility in the current economic and construction cost environment.

Several sites at Crows Nest show a significant increase in height, however due to the existing buildings located on many sites, they will not be redeveloped. Examples include;

- 220 Pacific Highway: The proposed rezoning shows the building height control increased from 16m to 59m (approximately 19 levels), with no FSR control. Whilst this sounds like a significant uplift, there is currently a 17 storey (approximately) strata titled building on the site.
- 599 Pacific Highway: The proposed rezoning shows the building height control increased from 40m to 64m (approximately 20 storeys), with no FSR control. A 20 storey strata titled building already exists on the site.
- 14 Atchison Street: The proposed rezoning shows the building height control increased from 49m to 95m (approximately 30 levels), with no FSR control. The existing strata titled 30 storey building on the site means that the existing use is its highest and best use.

Much smaller areas rezoned than was first announced – Example Cross Nest

When the TODs were first announced towards the end of 2023, the State Government advised that the rezoning catchment would be a 1.2km radius from the new Crows Nest metro station, which equates to an area of 4.52km<sup>2</sup> of land. The documents placed on public exhibition in July 2024 have significantly reduced the focus area for accelerated rezonings down to an area of approximately 0.27km<sup>2</sup> or just 6% of the original proposed area. Further high-level analysis of the focus area for accelerated zoning has been undertaken comparing the LEP maps in the Urban Design Report prepared by SJB to the current zoning controls:

- The majority of the western portion of the focus area for accelerated rezoning is zoned E2, which does not permit any residential uses. Any increase in height or FSR in these E2 areas does not result in any additional housing supply.
- Many of the lots that have received additional residential Height and FSR, have also received a corresponding increase in non-residential minimum FSR requirements up to 3:1. Given the current state of the commercial market, this additional non-residential FSR will likely render these sites unfeasible.
- Proposed rezoned R4 zoned land within 100m of the Crows Nest train station and adjoining MUI zoned land have a proposed height control of 29m, but an FSR of only 2:1, which given the proximity to the Metro is extremely low, particularly when you consider that Train Stations under TOD Stage 2 would provide higher residential density with a height control of 22m (for residential flat buildings) and an FSR of 2.5:1.
- All existing R3 & R4 zoned land within 400m or 800m of the Crows Nest or St Leonards train stations have received no increase in density. The Urban Design Report prepared by SJB notes that some of these areas may also be subject to changes under anticipated housing reform controls and therefore rezoning may not be required. We are not aware of any housing reform controls that would increase the densities for these areas.

The proposed plan offers extremely limited opportunities for new housing supply compared to the State Governments initial announcement last year, which is further reduced by rezoned sites having already been developed to their maximum potential, as outlined above. For these reasons we do not see the proposed addition of 3,255 new dwellings coming even close to being achieved by the proposed rezonings.

### **Recommendation**

- Crows Nest is so flawed that it should come off exhibition, be redesigned in line with the recommendations above, additional rezoned areas added and then be re-exhibited with the Bays West exhibition.

*Some areas have seen potential downzoning where new height controls can't be realised*

There are areas around Kellyville Station where heights have been increased but FSR reduced, which would result in a loss of developable floor areas. One example from a member who has a site with the prior affordable housing bonus resulting in close to a 4:1 FSR (with 87,000m<sup>2</sup> GFA). With the new FSR limits of 2.2 -1 the site now has a GFA achievable of 48,000m<sup>2</sup>. The result is that the yield is almost halved.

### **Recommendation**

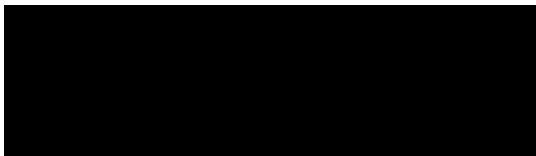
- The realisable GFA in each of the accelerated precincts needs to be retested to ensure that where heights have been increased, an unintended consequence of a site being constrained has not been realised by the unaltered or altered FSRs.
- UDIA would recommend having an uncapped FSR (given the setback controls and the ADG will control the form of the building).

### **Conclusion**

UDIA wishes to be part of the ongoing conversation to ensure NSW has the best chance it can at delivering the homes it so desperately needs. UDIA appreciates this opportunity to offer our comments, and we would like to work closely with DPHI in the continued role out of the TOD precincts more broadly.

If you or your team have queries about the content of this submission or wish to discuss it in more detail, please contact UDIA NSW Director of Policy, Harriet Platt-Hepworth on 0474 772 291 or at [hplatthepworth@udiansw.com.au](mailto:hplatthepworth@udiansw.com.au)

Kind regards,



**UDIA NSW**



## **Appendix A: NSW TOD Accelerated Precincts, From Planning to Delivery**

### **Executive Summary**

The NSW Government is focusing on achieving an ambitious housing target of 377,000 new homes in the next five years, including a bold reform agenda around Transport-Oriented Development (TOD). This includes the delivery of 47,800 higher-density homes in eight TOD Accelerated Precincts, to be led by the NSW Government. As a necessary first step, the Department of Planning, Housing & Infrastructure (DPHI) has focused on rezoning and master planning these Accelerated Precincts. Less clear is how the NSW Government will progress them from planning to delivery, noting that TODs suffer from a range of delivery issues, which include:

- A lack of coordinated governance around TODs, accountability and responsibility, and capacity and capability for delivery, all of which create difficulties in coordinating across many agencies, especially for infrastructure provision.
- An unsupportive planning system that delays delivery, increases costs, fails to maximise the opportunities from TODs and is not outcomes focused.
- Failing to create great places designed and delivered in partnership with developers and local communities.
- Development feasibility barriers (UDIA NSW has discussed this issue in our recent Making TODs Work research report).

In addition, the current list of eight TOD Accelerated Precincts must not be a one-off. To maintain housing supply and tackle the housing supply crisis in the medium and long term, a pipeline of ongoing TODs needs to be developed. This pipeline should build on and improve the development process of additional new TODs, including policies, strategies, methodologies, and optimised planning and delivery pathways.

To support an ongoing TOD program, this paper makes several recommendations to the NSW Government grouped within three broad areas for action:

1. Strengthen TOD governance for delivery, including creation of a dedicated and empowered TOD delivery function, tasked with coordinating existing and new TODs, and a single accountable Minister responsible for TOD delivery and removing barriers to housing supply.
2. Enhance the planning system around TODs, including developing an 'Expected Development pathway' for developments in accordance with the precinct master plan, resolving infrastructure planning and contributions as part of the upfront rezoning, and other planning efficiencies.
3. Optimize the potential of TODs and create a further pipeline of Accelerated Precinct TODs to support long-term housing supply and affordability across NSW.

By implementing the recommendations in this report, the NSW Government will set up TOD Accelerated Precincts to maximise their contribution to housing supply while creating great places for communities. This will help address the current housing crisis while building long-term community support for densification across NSW to support a growing population.

## **Summary of Recommendations**

All of these recommendations outlined below relate to TOD Accelerated Precincts.

### **Section 1 – TOD Governance:**

1. Create a TOD delivery function within the NSW Government that is accountable for successful delivery of all TOD Accelerated Precincts.
2. Appoint a single Minister responsible for TOD delivery.
3. Implement standardised principles or rules at TODs that support housing supply and affordability.
4. Develop and implement a strategy for building capacity and capability for TOD development and delivery.
5. Appoint an Advisory Panel of global and Australian experts in TODs.
6. Develop a framework for delivering TODs based on global experience.
7. Experiment with alternative forms of stakeholder engagement that focus on the design and amenity of TODs instead of height and density.

## **Section 2 – Streamlining planning for TODs**

8. Streamline the NSW Planning System for TODs, including providing an 'Expected Development' pathway.
9. In TODs, deal with agency concerns as part of master planning and remove DA requirements for referrals unless it is outside the agreed-upon parameters in the master plan.
10. In TODs, reduce DA reporting requirements by undertaking reports at a precinct level as part of master planning.
11. All TODs should have industry-specific Secretary's Environmental Assessment Requirements (SEARs) to remove the need for project-by-project SEARs.
12. Establish planning controls in a TOD parallel to the master plan.
13. Allow State Significant Development Approvals (SSDA)s to be processed in parallel with the master planning.

## **Section 3 – Optimizing the potential of TODs, over time**

14. Undertake a detailed analysis of each site in the TODs to understand the barriers to reaching their potential and seek to remove them.
15. Identify the regulations that most restrict yield on TODs and undertake a financing/affordability cost-benefit analysis to decide whether to keep them.
16. Decide on the re-zoning radius of TODs based on transport accessibility and plan to increase transport accessibility to expand the radius.
17. DPHI should begin a transparent process for building a pipeline of TODs.

## Background

### Introduction to Transit-Oriented Development

Transit-Oriented Development (TOD) is a planning and urban design principle focused on high-density development close to transit nodes. It encourages the use of public and active transport and reduces the need for private commuter transport, such as cars.

Although the idea has a long history and is found in different ways in many forms of urban development, American urbanist Peter Calthorpe first used this terminology in the early 1990s to promote more sustainable forms of urban development and said a TOD area is 'a mixed-use community within an average 800 metre (or 10-minute) walking distance of a transit stop and core commercial area'.

Key characteristics of places designed on TOD principles include:

- A range of high and medium-density residential developments, typically dominated by apartments but with a mix of scales and forms responsive to the local context.
- Have good access to high-frequency public transport (typically rail but also potentially rapid bus & ferry transit) and high-quality pedestrian and cycling networks.
- Are linked by these transport networks to places with a high concentration of jobs and services – either major urban commercial centres or key education and health precincts.
- Critically, depend on the redevelopment of fragmented, privately held land in a coordinated and well-incentivised way.

TOD initiatives are most common in modern cities in North America, Latin America, and Asia, where new or existing rail infrastructure is not fully developed. In contrast, in older European or Asian cities, where urban infrastructure serviced existing dense urban environments, TOD programs try to retrofit density into places where it has not always existed – for instance, station precincts surrounded by low-density single homes or land used unproductively for car parking.

Whilst the NSW Government's focus on TODs is historically significant in scope and significance, TODs have been included in all recent strategic plans and many examples of development in Sydney are TOD in character or apply TOD principles.

Throughout the 2000s, metropolitan centres like Chatswood, Parramatta, Burwood and Rhodes were identified for significant growth, primarily due to their connectivity via the heavy rail network. In recent years, the Priority Precincts program has focused on rezoning existing centres for higher-density development. However, many of these precincts have not performed as planned due to uncertain planning processes, poorly implemented design principles and the complexity of governance for delivery.

That is why the current focus on the TOD Program by the NSW Government is so significant and why it is so critical to get delivery right.

The TOD Program is designed to address housing shortages by delivering additional housing supply near 45 identified transport hubs. There are two parts to the program:

- Part 1: TOD Accelerated Precincts (the focus of this report): Rezoning the land within 1,200 metres of eight stations within Greater Sydney to deliver high and mid-rise housing.
- Part 2: New Planning Controls: Introducing the Transport Oriented Development State Environmental Planning Policy (TOD SEPP) to allow more mid-rise housing within 400 metres of 37 stations across NSW.

In the TOD Accelerated Precincts, DPHI will undertake master planning and technical studies for each precinct and lead accelerated rezonings (informed by master plans) for all eight sites. A new State Significant Development Assessment pathway (triggered by development capital value over \$60M) will be in place until November 2027. Councils will assess developments for less than \$60M. DPHI is committed to assessing applications within 90 days.

### **Basis for our recommendations in this Report**

This report has been prepared by UDIA Urban Renewal, BTR, TOD and Local Centres Committee members with experience across development, design,

planning, and precinct delivery. This report focuses on the TOD Accelerated Precincts and the need to maintain a future pipeline of similarly scaled precincts where large landholdings and infrastructure investment can substantially contribute to housing supply and economic growth. Whilst the 'New Planning Controls' precincts are also critical to NSW's growth; their urban development pattern and model are substantially different to the TOD Accelerated Precincts necessitating a different approach and focus to achieve success.

The key questions that have framed this research and recommendations are:

- What does best practice delivery, planning and governance look like for TOD Accelerated Precincts?
- What are the optimal planning pathways and key obstacles to accelerate TOD delivery in NSW?
- How can the NSW Government, working with councils and the private sector, avoid the mistakes of past precincts, and ensure delivery mechanisms to accelerate the housing completions necessary to meet the National Housing Accord target?

In response, our report focuses on three areas for consideration by the NSW Government:

- Proposing enhanced TOD delivery governance, including a dedicated state led TOD delivery function tasked with coordinating the successful delivery of the initial eight and future TODs reporting to a single accountable Minister. To meet its objectives, the TOD delivery function should create a delivery framework based on lessons from TODs globally.
- Streamlining the planning processes around TODs, including developing an 'Expected Development pathway' for developments in accordance with the approved precinct master plan and resolving infrastructure planning and contributions as part of the upfront rezoning. This should include advanced industry, community, and stakeholder engagement approaches to move beyond objections to height to prioritize community requirements and design quality at TODs.
- Optimising the housing potential and outcomes of TODs at each location and ensuring a pipeline of future TODs.

## Section 1 – TOD Governance

Achieving successful delivery of the TOD Accelerated Precincts is critical to tackling the housing affordability crisis. In some quarters, there is the misconception that doing high-quality master planning of a TOD is sufficient to deliver good outcomes. However, the experience in NSW and around the world is that whilst high-quality master planning is essential to delivering successful TODs, it is not sufficient. TODs are delivered over a long period, often up to twenty years. The delivery of TODs needs to be managed throughout this period to solve problems, remove barriers to success and make changes in response to changing markets and circumstances. A local example that exemplifies this is Zetland, where the City of Sydney has curated the precinct through a place-based governance framework and leveraged developers' contributions to create a high-amenity precinct.

Successful delivery management of TODs requires:

- Robust delivery governance, clear accountabilities and responsibilities for planning and delivery.
- Appropriate capacity and capabilities.
- Creating processes that support the key elements that enable TODs and their communities to thrive over time.

### 1.1 Accountability and Responsibility

To succeed, TODs need effective collaboration with a wide range of stakeholders, including government agencies, local councils, and developers, over a sustained period. Experience in NSW and around the world has demonstrated this does not happen organically; mechanisms need to be put in place to facilitate this collaboration, and where consensus cannot be achieved, decisions must be made to enable delivery. Where accountability and responsibility are lacking, issues arise in a variety of ways:

1. *Overall ownership of and responsibility for TOD delivery is unclear* following DPHI rezoning and master planning. During the early development of a TOD, when the master planning is being undertaken, there is clear ownership of



the TOD. However, once the planning is done, TODs often stall, with no clear accountability and responsibility for delivery. Consequently, TODs can fail to meet their objectives and create the great places envisioned in the master plan.

2. *A need for infrastructure and amenity coordination.* The successful creation of TODs requires many agencies to come together to deliver an integrated and holistic TOD that supports the growing population, including planning, transport, schools, hospitals, local Councils, and treasury. This requires aligning priorities across the agencies and making trade-offs to match available funding and leveraging government land to benefit the entire precinct. Unfortunately, the structures and processes to align agencies around a 'place' have historically been missing. Current NSW Government processes are not designed to support a place-based approach to infrastructure, with each siloed agency having a separate business case for their specific interests and priorities. This makes infrastructure coordination very difficult and slows down delivery.
3. *Uncertainty over infrastructure funding.* The sources of infrastructure funding for a TOD are often varied and include council funding, local and state infrastructure contributions, works in kind, and state and federal funding. With clear accountabilities, identifying infrastructure priorities, timings, and funding sources is easier. For example, infrastructure funded by local contributions often suffers from only being delivered once the contributions have been paid and the infrastructure can be fully funded. The result is that infrastructure is frequently delivered many years later than required, undermining community acceptance of TODs.
4. *Dispersed ministerial accountabilities.* Government agencies must not be the only ones brought together to deliver TODs successfully; Ministers must also coordinate to prevent agencies from being pulled in different directions.
5. *Maintaining focus over time.* The NSW Government's focus on delivering a TOD can reduce once it moves into the planning approval/assessment

stage, which is usually run by local government. Whilst not an issue where councils have the capacity, capability, and willingness to deliver TODs, for too many Councils, this is not the case. In those cases, the NSW Government needs to retain an oversight role.

6. *Political pressures in local constituencies* can result in reduced housing supply and associated amenities when influential community groups pressure their local MPs to water down TOD proposals, particularly regarding height and density. Local MPs can lobby the Planning Minister to scale back TOD plans. Whilst political lobbying and community interest groups are a reality of our political system, it is essential that the opportunities of TODs are optimized in all locations – based on place and community requirements rather than political pressure.
7. *Councils take different approaches to TODs.* The current TOD program demonstrates wide differences in whether councils support TODs. Most have welcomed TOD Accelerated Precincts and will work constructively to deliver them. Unfortunately, some councils are less supportive.
8. *Inflexible approaches to development feasibility.* Developers need to generate a financial return to deliver housing at TODs. This is often driven by the banks, who require a certain level of return to reduce risks before providing finance. There are many complexities around feasibility, such as when the land was purchased and at what price, changes to construction costs, infrastructure contributions, land fragmentation etc. However, if a significant site in a TOD is not delivered due to feasibility concerns, it can undermine the whole precinct.

The NSW Government has encountered all these challenges in its efforts to deliver precincts over many years. It has tried various methods to improve delivery, including recently, the appointment of the CEO of Infrastructure NSW to act as the Coordinator-General for infrastructure in Western Sydney and elsewhere to facilitate the alignment of government infrastructure agencies. Given the challenges of infrastructure coordination, UDIA has welcomed this

announcement. Over the years, the NSW Government has used many models and governance arrangements to try and improve the delivery of precincts:

#### *Delivery Authorities*

The NSW Government has used delivery authorities like the Barangaroo Delivery Authority and Sydney Olympic Park Authority to create and deliver precincts. However, the delivery authority model has had mixed success, with the Western Parkland City Authority recently being restructured and its scope narrowed.

#### *Cabinet Sub-committee*

The NSW Government has sometimes had cabinet subcommittees focusing on housing delivery. These have been relatively successful at coordinating government activity. However, they have tended to become watered down over time as government priorities have shifted.

#### *The 2000 Sydney Olympics*

During the NSW Government's preparations for the Olympics in 2000, to speed up decision-making and improve coordination, an Olympic Coordination Authority (OCA) was created by amalgamating the divisions within five State Government agencies responsible for delivering the venues, reporting to one Olympics Minister.

In addition, a second agency, the Olympic Roads and Transport Authority (ORTA) was established with three state agencies involved in coordinating the delivery of transport services for the Olympics, again reporting to the Olympics Minister.

Key governance arrangements for the Olympics included:

- A single Minister responsible for delivery.
- Merging agencies or divisions within agencies to support delivery.
- Providing planning powers to the Minister (delegated to the agency), including a rapid approval pathway where development was aligned with the precinct plan, subject to a design review.

### *The Growth Centres Commission (GCC)*

The Growth Centres Commission was constituted on 1 July 2005 as a development corporation under the Growth Centres (Development Corporations) Act 1974 to support development in the North West and South West growth centres. A key objective of the commission was to speed up the development of the growth centres. Key governance arrangements from the Growth Centres Commission included the following:

- As with the OCA, the Minister responsible for the Commission had consent authority over development in the growth centres and delegated it to the Commission.
- A collaborative ethos with a focus on delivery. The collaborative planning the Commission undertook with local Councils exemplified this.
- The Commission had the power to be the water authority in the growth centres. This meant it had the option of building its own water infrastructure and potentially bypassing Sydney Water if it would be a roadblock to development. This did not turn out to be the case, but the power was helpful in discussions about the provision of water infrastructure with Sydney Water.
- Creating a bespoke infrastructure contributions framework for the growth centres.
- Focus. The Commission had a limited number of areas to focus on.
- A Board providing external expertise and advice.

### *Councils*

The NSW Government has had limited resources to rezone precincts. Therefore, it has been inclined to do a rapid rezoning and then leave implementation to councils.

State-led intervention in planning requires the Planning Department to take the lead in the rezoning process in place of the relevant council. There are different examples of how the state and local governments work together, but typically, the state government dominates and leads the process. Councils may actively participate, participate passively, or choose not to participate altogether.

In the past, this has meant the following:

- Key issues deferred past the rezoning (like contributions plans) are delayed, and few dedicated resources are available to deliver.
- Councils can frustrate the objectives of a precinct rezoning, e.g. by setting unrealistic local Development Control Plan (DCP) controls, slowing development applications, or not providing adequate resources for implementation.
- If precinct rezonings do not lead to desired development outcomes, there is no means of evaluating or revisiting how planning controls or other interventions could be adjusted.

These issues impacted St Leonards and Crows Nest, where the NSW Government finalised the strategic plan, but gave responsibility to proponents and councils to bring forward site rezonings. This created a slow and uncertain process that has undermined the precinct's strategic intent and delivery.

Another example is Macquarie Park, where regular changes to the strategic vision for the precinct over the past 15 years, have undermined landowner certainty, diminished market confidence, and caused pressure for intensive development outcomes. Currently, the state government and local council remain at odds, and without a clear governance model moving forward, the precinct is unlikely to reach its potential.

A key lesson for moving forward is that the NSW government needs to consider implementation as part of the precinct planning process and should include:

- Identifying a framework with multiple models for the government's involvement in TOD Accelerated Precincts and how it will work with Councils.
- Identifying discrete elements or parts of the process that councils can be fully responsible for, consistent with the precinct planning (i.e. the role of the City of Sydney in implementing the Pyrmont Peninsula Place Strategy).
- Considering how to manage councils opposing Development Applications (DAs) without merit, following controversial precinct rezonings, pushing projects down uncertain, expensive and unnecessary Independent Planning Commission (IPC) decisions.

- Developing precinct tracking mechanisms so the NSW Government can evaluate implementation and make necessary adjustments.
- Resolving infrastructure planning and contributions as part of the master plan will ensure that development is not later held up by uncertainty.
- Supplementing the expertise of government to build capacity and capability.

Considering these examples, UDIA has identified several governance elements that need to be put in place to support the delivery of TODs:

1. *A Sub-committee of Cabinet* that monitors TOD progress and can make decisions that cannot be resolved elsewhere. The NSW Government has already recognised the need for a cabinet sub-committee for housing delivery, and TOD delivery should be a regular part of this committee's agenda. In addition, this committee should review and recommend the densities around TODs, and any proposed changes to these densities should be referred to the sub-committee for a view.
2. *A single, accountable Minister* responsible for TOD delivery (post planning) and maximising housing and placemaking outcomes at TODs. Whilst the master planning of TODs sits with the Minister for Planning, it is just as important that the delivery of TODs is also the responsibility of one Minister, empowered to manage competing interests and delivery complexities and, if required, instruct agencies.
3. *An empowered and funded government agency* (a whole new entity or part of an existing entity) is responsible for coordinated and streamlined TOD delivery, with powers to coordinate with other agencies and make changes to reflect local conditions. This TOD delivery function should be flexible with how it works with councils on TOD delivery. Where a council wishes to take ownership of a TOD, is supportive of the master plan and has the capacity and capabilities to do it, the TOD should be handed over, but with ongoing delivery monitoring by the TOD delivery function. Where a council is not supportive of a TOD, the TOD delivery function should remain in complete control of the TOD, while still appropriately consulting with the

local council. The TOD delivery function should include the following powers and responsibilities:

- Responsibility for all TOD Accelerated Precincts and is focused on their coordinated delivery.
- The ability to amend the master plan (over time).
- TOD delivery, including resolving problems such as:
  - Fragmented land, including considering options such as reducing parking and servicing requirements that exacerbate the problem, tax incentives for consolidation or compulsory acquisition.
  - Local infrastructure delivery
  - Feasibility issues
  - Bringing forward housing within the Housing Accord period.
- Creating a cross-agency team, with key agencies, such as Transport and Sydney Water, seconding people into the team to provide support.
- Where possible, looking to transition TOD delivery to councils.
- Create local stakeholder committees, including developers, landowners, council, etc.

These three critical elements of TOD governance – a TOD delivery function, a single Minister, and a Cabinet subcommittee – should improve the level of accountability and responsibility to support the successful delivery of an ambitious TOD Program. However, additional capacity and capability must be developed to ensure success (see next section).

**Recommendation – Create a TOD delivery function within the NSW Government that is accountable for coordinating the successful delivery of all TOD Accelerated Precincts.**

**Recommendation – Appoint a single Minister responsible for TOD Accelerated Precinct delivery.**

Another of the areas for improvement in TOD delivery in NSW is the tendency to determine a separate planning pathway for each individual TOD. Standardised planning principles or rules around TODs would streamline and accelerate



delivery. Minneapolis in the US (see box B) has done this to great effect, significantly improving housing supply and affordability in less than four years. Although exactly copying Minneapolis would be inappropriate in the NSW context, some rules could be translated across, for example, defining density minimums around Accelerated Precinct TODs. The key is standardising rules supporting housing supply and affordability across all accelerated precinct TODs.

**Recommendation – Implement standardised rules at Accelerated Precinct TODs that support housing supply and affordability.**

## **1.2 Creating capacity and capability**

Creating TODs that are vibrant, well-connected, and balanced in terms of residential and employment land uses, while delivering a high amenity level is a complex endeavour that requires collaboration between the public and private sectors. Successful examples from around the world demonstrate that when local or State governments take a deliberate, proactive, and integrated approach, the results can lead to thriving communities. In contrast, when governments and the private sector do not collaborate effectively, governments tend to impose elements into a master plan that damage the precinct. For example, crude requirements for mixed-use have been known to create poorly located commercial premises that remain vacant and harm the place-making of the area, whilst parking maximums in places like Chatswood are making the apartments unsellable and preventing development.

A significant risk to the successful delivery of the initial TOD Accelerated Precincts is the lack of interdisciplinary expertise required to lead and deliver highly complex transit-oriented renewal projects within state and local government. Few agencies, councils, or individuals have the cross-cutting capabilities needed across transport, urban planning, development feasibility, and financing, plus the expertise to negotiate, collaborate, engage effectively with stakeholder groups, and integrate all to drive agreed-upon outcomes for each location.

Competition for a limited pool of experienced professionals and expertise has resulted in talent across relevant NSW Government agencies being stretched, and many smaller local councils across Sydney also having limited TOD delivery capability.

The NSW Government must also prioritise the development of essential cross-disciplinary TOD delivery capabilities to integrate development programs across state agencies, local and state government, private sector, and disciplines. This could be led by the TOD delivery function as discussed above and could include initiatives such as state-developer working groups for persistent challenges (such as development feasibility), cross-government secondments, forming shared project offices between local and state governments, bespoke cross disciplinary training, etc.

Building capacity and capability will require several years to develop. Therefore, additional measures are needed in the short term to supplement the skills and experience available to the NSW Government and local councils. These measures could take various forms, such as directly employing consultants and contractors in the TOD delivery function while permanent employees build up their skills and experience. Using consultants can be expensive, and the public service does not have a sound record of passing skills from consultants and contractors to permanent employees.

An additional approach would be creation of an expert independent advisory panel with global and Australian expertise in TODs, including construction, development, planning, delivery and management. This panel could undertake several roles:

1. Providing advice on creating and delivering TODs to Ministers and public servants.
2. Advising on funding and partnership structures.
3. Championing TODs in the community.
4. Sharing knowledge and expertise with the TOD delivery agency.
5. Scrutinising TOD plans and delivery progress.
6. Problem-solving delivery challenges.

7. Working with public servants to develop the policies and processes to get the TOD delivery function up and running and set it up for success.
8. Challenging existing BAU processes that have proved ineffective.

**Recommendation – Develop and implement a strategy for building capacity and capability for TOD Accelerated Precinct delivery.**

**Recommendation – Appoint an advisory panel of global and Australian experts in TODs.**

### **1.3 Creating the processes that enable TODs to thrive.**

International experience has identified several facets that help TODs to become the great places we need to aspire to:

1. *Flexibility Over Life of the TOD*: Any precinct plan must be able to evolve over its lifetime.
2. *Integrated Planning and infrastructure coordination*: A holistic view of urban planning that includes housing, transportation, and amenities.
3. *Regulatory Frameworks*: Implementing deliberate policies and regulations that support the desired outcomes of urban development.
4. *Affordability*: Ensuring a mix of housing options to cater to different income levels.
5. *Community Engagement*: Involving local stakeholders, including residents and businesses, in the planning process to ensure that the place meets the community's actual needs.
6. *Performance Targets*: Setting clear performance targets for liveability outcomes.
7. *Public-Private Partnerships (PPPs)*: Engaging with the private sector to leverage additional expertise, efficiency, and funding (see box A).
8. *Transparent and Accountable Systems*: Implementing transparent processes and accountability mechanisms to track progress and ensure responsible use of resources, including local contributions.

9. *Legal and IT Frameworks*: Establishing robust (but simple to implement) legal and IT systems to support public investment planning, allocation, and implementation.
10. *Capacity Building*: Investing in human resources and capacity building to improve the skills and capabilities of those involved in infrastructure planning and delivery.
11. *Place-Based Vision*: Developing a clear, strategic vision specific to a region's needs that can be easily translated into more defined district/precinct needs.
12. *Sustainability*: A focus on creating environmentally friendly and energy-efficient buildings and neighbourhoods. For example, Barangaroo.
13. *Innovation*: Utilising new technologies and innovative practices in urban development.

In short, NSW needs to develop and implement processes to deliver successful TODs. Fortunately, NSW can draw on significant resources to create those processes. These include the [Victorian Planning Authority's Guidelines](#), the IMF's [Public Investment Management Assessment](#) (PIMA) framework, and the [World Bank's Infrastructure Governance Framework](#).

Implementing a solid but pragmatic framework that integrates the above elements can help avoid the legacy shortfall and backlog of many TOD challenges such as misaligned infrastructure, land fragmentation, dissatisfied communities and meeting ambitious housing targets. Establishing and overseeing the framework would sensibly be another role for the TOD delivery function.

**Recommendation – Develop a framework for delivering Accelerated Precinct TODs based on global experience.**

A further area for particular focus in NSW is community engagement. Precinct planning in Sydney over the past decade has often come undone at the stage of formal community consultation. Here are a few examples:

- The Rhodes priority precinct was first announced in 2015, exhibited thrice in 2017, 2018 and 2020, and finalised in 2021.
- The Parramatta North precinct spent 10 years being passed between council and state, unexpectedly excluded from CBD rezoning in 2022 and the 2024 rezoning has reduced development scale, trying to resolve issues that should have been addressed earlier which will likely result in multiple projects not proceeding.
- The Sydenham to Bankstown line. In response to community sentiment, the NSW Government backed down on a corridor strategy. The council then moved forward with more intense master plans for key stations. Nearly ten years later, the TOD program may now achieve a mid-rise plan for a number of further stations.
- Waterloo Estate – a deeply engaged local community was involved in an extensive and repetitive consultation process where the community felt it was not listened to.

The Government's intent for a precinct and the community's aspirations are often misaligned. The Government releases plans for high density in a local area, with the community reacting to refute or disagree with the premise of higher density.

Traditionally, stakeholder consultation has focused too much on heights and whether a community wants a TOD and not enough on its design and the community infrastructure required. Alternative engagement models with communities and other stakeholders should be explored to enable much higher levels of involvement in the design of a TOD and the trade-offs involved to achieve optimal community outcomes.

**Recommendation: Experiment with alternative forms of stakeholder engagement that focus on the design and amenities of TODs instead of height.**

## **Section 2 – Streamlining Planning for TODs**

Getting the right governance around TODs is essential for success, but more is needed. We also need to consider how to achieve the following:

- TOD Accelerated Precincts planning can be improved; and (in Section 3);
- How the benefits of TOD Accelerated Precincts can be maximised; and
- How TOD Accelerated Precinct delivery can be optimised over a time horizon of twenty years.

## **2.1 Improving TOD Accelerated Precincts Planning**

The current TOD planning process has several problems that, if rectified, could significantly speed up housing supply and deliver better place outcomes.

The NSW Planning System is widely acknowledged as having its challenges. It is expensive to administer (causing resourcing issues for assessing DAs), costly to navigate, slow, and unpredictable. Left as it is, the system will significantly hinder good TOD Accelerated Precinct outcomes, reducing housing supply, slowing delivery, and delivering sub-optimal place-based outcomes. In short, the NSW Planning System needs to be adjusted to achieve the outcomes aspired to and possible with TODs.

The planning reform for TOD Accelerated Precincts should draw lessons from the Olympics and Queensland, where consultation occurs as part of the master planning. An 'Expected Development' pathway that provides deemed approval for a DA within the master plan, subject to the design (via an efficient design review process), would significantly improve TOD delivery, housing supply and place-based outcomes.

### **Recommendation – Streamline the NSW Planning System for TOD Accelerated Precinct, including providing an 'Expected Development' pathway.**

Once Master planning is complete, developers must submit Development Applications (DAs) for their projects. Their DAs are referred to government agencies for consideration in this process. Referrals can cause two issues. First, government agencies are often slow to consider referrals. Second, new issues arise that, for some reason, were not included in the master plan, even when the DA aligns entirely with the outline set out in the master plan.

Any strategy for improving referrals needs to take a multi-pronged approach, including:

- Reducing the number of referrals.
- Speeding up referrals.
- Reducing the number of new issues that arise from referrals.

To reduce the number of referrals at the DA stage, agencies should submit their issues and resolve them (even if the government agrees to ignore the agency concerned) as part of the master planning process, and DAs no longer need to be referred to an agency if it aligns with the masterplan.

**Recommendation – In TOD Accelerated Precincts, ensure that agency concerns are addressed as part of the master plan and no longer require referrals as part of a DA unless it is outside the agreed-upon parameters in the master plan.**

The reports required to support a DA are extensive, time-consuming, and costly, and when considered at a TOD level, they are incredibly inefficient. For example, every DA has to provide traffic reports and social impact assessments, creating an extensive duplication of work for each DA. Undertaking these studies as part of the master plan should remove the need for them to be undertaken by any DA that complies with the master plan's parameters. Even where a DA is outside the master plan parameters, the reporting requirements should be significantly reduced, given the previous work undertaken.

**Recommendation – In TOD Accelerated Precincts, reduce DA reporting requirements by undertaking reports at a precinct level as part of master planning.**

The Secretary's Environmental Assessment Requirements (SEARs) specify what issues must be addressed within an Environmental Impact Statement (EIS), which can be costly and time-consuming. However, these requirements can also be reduced by the upfront preparation of what are known as industry-specific SEARs, which remove the requirements for SEARs on a project-by-project basis. Creating



industry-specific SEARs for all TOD Accelerated Precinct would help streamline the development process.

**Recommendation – All TOD Accelerated Precincts should have industry-specific SEARs to remove the need for project-by-project SEARs.**

As part of creating the planning framework around a precinct, once the master plan is complete, sites cannot come forward until the planning controls are established. However, there can be a lengthy delay before this occurs, delaying housing supply and reducing feasibility. If planning controls were established in parallel with the master plan, delivery delays could be significantly reduced.

**Recommendation – Establish planning controls in TOD Accelerated Precincts parallel to the master plan.**

Should an 'Expected Development' pathway not be available, an alternative way to improve housing delivery would be to undertake a State Significant Development Application (SSDA) process in parallel with the master planning.

**Recommendation – Allow SSDAs to be processed in parallel with master planning.**

### **Section 3 – Optimising the potential of TODs, over time.**

Given the importance of TOD Accelerated Precincts for delivering housing and reshaping our cities, it is essential to optimise each TOD's potential. Reducing a TOD's potential causes several significant issues beyond reducing the total quantum of housing provided.

Firstly, reducing the yield on sites makes them less feasible and less appealing to invest in and slows down land acquisition, development, and housing supply.

Secondly, much of the amenity available in a TOD heavily depends on the scale achieved. Facilities like childcare centres, coffee shops, restaurants, etc., depend

on sufficient patronage. The less density, the less viability of those amenities, and placemaking outcomes are compromised.

The first challenge to be addressed in maximising the potential of TODs is to ensure high-quality data on precinct yield. The current TOD Accelerated Precincts target is 47,800 new homes over 15 years. However, this number is likely to be dragged down by sites that:

- Require amalgamation to achieve their potential.
- Are unable to transact due to developers and landowners being unable to agree on a price.
- Have yield & feasibility challenges.
- Are located in a sub-market without the capacity to absorb all the new homes.

The NSW Government should examine each TOD in detail to identify obstacles to achieving their potential and, where necessary, make changes to get as close as possible to 47,800 new homes. Interventions could include incentives to encourage amalgamation and early transactions and support for feasibility. The government's adoption of the UDIA's proposal to pilot purchasing homes to support pre-sales is an excellent example of where the government can deliver affordable housing while supporting market housing. Finding solutions to ensure TODs are delivered should be the new role of the TOD delivery division and the TOD advisory panel.

In some cases, TODs have significant land fragmentation. If not managed, this can hinder the delivery. For example, Leppington is often pointed to as an example of where fragmentation has prevented the successful delivery of the TOD.

Currently, LEP controls have some incentives to encourage amalgamation, such as requiring minimum lot areas. However, consideration needs to be given to what happens if these are insufficient and further measures are required. These could come as three approaches:

1. *Reduce the need for amalgamations.* On some sites, there is an option to reduce the need for amalgamations, such as by removing the need for parking. For example, in town centre/high street locations the need to deliver minimum parking spaces can hinder development as basements need to be of a certain size and configuration to enable circulation, plant and ramps, waste etc. Removing the need for parking or requiring a maximum rate removes the need to amalgamate 3 or 4+ properties to make the basement work.
2. *Providing time-limited incentives.* It might be appropriate to provide additional incentives to amalgamate land on some sites, such as reducing infrastructure contributions on an amalgamated site for up to a fixed period, say two years.
3. *Retain incentives which are working well.* For example, along Liverpool Road in Ashfield (see below) where developments on 6-10m wide, properties are being renewed as shop top housing. LEP controls incentivise amalgamation by requiring minimum lot areas or site frontages to enable residential flat development to be delivered.



**Image source:** Google Maps – Street View, accessed 22 August 2024.

4. Where incentives are not working, the NSW Government should consider compulsory acquisition where the site is critical to TOD delivery and

outcomes. In some circumstances, the government may profit on a site that has been compulsorily acquired, if the amalgamation of lots makes the whole of greater value than the sum of the parts. In these circumstances, any profits should be used to provide infrastructure in the TOD program.

**Recommendation: Undertake a detailed analysis of each site in the TOD Accelerated Precincts to understand the barriers to reaching their potential and seek to remove them.**

Existing government regulations also limit the potential of sites. Although they have been created with good intentions, the costs against the benefits have often not been adequately analysed. Examples of regulations that should be examined include:

- Restricting building heights based on ensuring solar access for open spaces. The current regulations should be reviewed to consider whether the current balance between sun and shade is appropriate for NSW's climate.
- Restricting building height to create a bell-curve skyline. Other successful cities have used alternative approaches. For example, the relationship between buildings in Manhattan and Central Park in New York does not follow a bell-curve typography.
- Apartment Design Guide (ADG) direct sunlight requirements need to be updated. This policy unintentionally skews the distribution of apartments in favour of smaller apartments at the expense of families, as developers have to maximise the number of apartments with access to direct sunlight. This requirement could be replaced with an approach based on access to daylight, allowing more flexibility.

**Recommendation: Identify the regulations that restrict yield on TOD Accelerated Precincts and undertake a cost-benefit analysis to decide whether to keep them.**

Currently, for TOD Accelerated Precincts, the NSW Government has taken a one-size-fits-all approach to the radius of rezoning, loosely based on the ability to walk to the station in a TOD. Whilst this is a good start, to maximise the potential of each TOD moving forward, the government should take a more context-specific approach to the re-zoning area. Specifically, where TODs have higher levels of accessibility by bike, bus or light rail, then the radius should be expanded. In addition, transport planning should look to upgrade the accessibility of TODs through improved infrastructure and services, supporting an expansion of the radius.

**Recommendation: Decide on the re-zoning radius of TOD Accelerated Precinct based on transport accessibility and plan to increase transport accessibility to increase the radius.**

UDIA warmly welcomes the government's approach of creating TOD Accelerated Precincts. However, eight Accelerated Precincts are just the beginning of what is required to supply housing and livability in NSW in the medium term; these will need to be supplemented with additional TOD Accelerated Precincts.

The NSW Government needs to develop a continuous pipeline of TODs so that when the master planning of the current eight is completed, the master planning of additional TODs can commence. To support the pipeline, the NSW Government should undertake a detailed analysis of the next set of TODs with the highest potential. Given the controversy over the selection of the existing TODs, this should be a more transparent process, clearly setting out the criteria by which the next set of TODs will be selected. These criteria will probably include consideration of existing master planning being underway, infrastructure availability, and yield potential.

**Recommendation - DPHI should begin a transparent process for building a pipeline of TOD Accelerated Precincts.**

## Conclusion

The NSW Government's policy on TOD Accelerated Precincts is a significant step forward. However, to create great livable places and maintain community support for TODs, NSW needs to get better at delivering them and learn lessons from other jurisdictions that have developed more mature TOD capabilities. This needs to include:

- Improving the governance of TODs, including creating a function dedicated to TOD delivery and with the powers to resolve the most difficult barriers to success, such as coordinating infrastructure agencies and priorities.
- Developing the capacity and capability to support TOD delivery in both the state and local governments.
- Enhancing TOD processes and frameworks, such as leveraging skills and capital through private sector partnerships.
- Improving planning processes to reduce costs and speed up delivery.
- Maximising the potential of individual TODs and building a pipeline of TOD Accelerated Precincts.

The TOD Accelerated Precincts are key to supporting NSW's housing supply and affordability. By adopting the recommendations in this report, UDIA NSW believes we will set the state up for ongoing success in meeting the state challenging housing targets and ensuring great places for our communities.



## Appendix

### Box A – Partnerships

The success of the Transport Oriented Development reforms in Sydney will be dependent on successful industry and development partnerships.

There is a long history of successful public-private partnerships (PPPs) in Australia, and they are proven around the world as effective structures for transit infrastructure funding and associated urban development. PPPs and development partnerships have been used on the four integrated station developments on the soon-to-open City and Southwest Metro line, as well as at many other Metro and transit developments around Sydney.

However, to date, they have been delivered site-by-site, with each site led by one of many state government departments or local governments and each having its own financing, funding, and partnership structures. London has been exploring a different approach.

### Case Study – Places for London Partnership



Image Source: [Places for London - New London Architecture \(nla.london\)](https://nla.london/)

Places for London is Transport for London's financially independent property company. It has a £2 billion property portfolio and is targeting the creation of 20,000 new homes and 600,000 square feet of new workspace across London in the next ten years. Their delivery programmes include a Property Partnership Framework (which has also been adopted for use by the Greater London Authority), direct development, site-specific partnerships, and a build-to-rent portfolio.

There are 13 companies and consortia signed up to the Places for London development framework, creating joint ventures with leading developers in multi-site arrangements which are more efficient than procuring partners on a site-by-site basis and which allows targeted partnerships at scale, based on the preferred market and expertise of each partner.



## Box B – Multiple housing and affordability measures – Minneapolis, Minnesota



Image Source:

[https://en.wikipedia.org/wiki/Minneapolis%E2%80%93Saint\\_Paul#/media/File:2008-0712-MPLS-pan00-mp-edit.JPG](https://en.wikipedia.org/wiki/Minneapolis%E2%80%93Saint_Paul#/media/File:2008-0712-MPLS-pan00-mp-edit.JPG)

Minneapolis, a growing American metropolis of over 3 million citizens, has demonstrated an effective policy response to its housing crisis. The *Minneapolis 2040 Plan*, introduced in 2020, included wide-ranging reforms across 100 policy areas, with four critical housing and affordability reforms demonstrating early results in rents stabilising despite population growth and inflation and a higher rate of housing supply than other comparable cities. The four key reforms included:

### *1. Eliminating parking minimums*

In 2021, parking minimums were eliminated from Minneapolis zoning codes, allowing developers to determine optimal parking requirements for each site based on the appropriate land cost, proximity to transit and customer base. To date, this has resulted in an overall reduction of average parking spots per unit and a redistribution of parking-to-unit ratios, with some developments retaining

relatively high parking levels, offset by increased apartment numbers with little or no parking.[1]

Considered with other US cities that have eliminated or reduced parking minimums, such as San Francisco, New York City, Buffalo, Seattle and Cincinnati, this has proven to be a simple way to encourage urban construction by reducing construction costs and improving feasibility whilst mitigating emissions and creating more compact and sustainable urban form.[2]

## *2. Creating density minimums near public transit stations, with higher standards near popular transit hubs and even higher ones downtown*

Like Massachusetts and Connecticut, Minnesota established policies for density minimums near high-use transit corridors and with higher standards near popular transit hubs and even higher ones downtown. This reflects growing recognition of the environmental and economic benefits of transit-oriented development, plus their ability to increase housing supply and expand the demand for public transport.<sup>2</sup> As a relatively non-contentious measure, this is considered likely to have contributed to Minnesota's growth in housing supply.

## *3. Abolishing single-family zoning (the first city in the US to do so)*

A significant policy change was the banning of single-family zoning (previously disallowed in 70% of Minneapolis, and with a long racist history in the US, essentially 'exclusionary zoning') and the legalisation of duplexes and triplexes – allowing 'gentle density across' the metropolitan area, plus allowing apartments and condos in commercial zones.<sup>2</sup>

Interestingly, and like Sydney, much of the media and local opposition focused on this policy rather than Policy 2 (increased transit density). Legislating Policy 3 has proved problematic despite cross-partisan support and a highly representative support coalition of social justice, community, housing, pro-density supporters and commercial groups. The bills, known as the 'missing middle bill' and the 'multi-housing bill' were initially defeated (and are now in amendment) due to strong local council resistance, particularly in the outer suburbs due to concerns on how required upgrades to infrastructure would be funded, and the loss of public participatory processes to streamline processes. [3],[4]

4. *Increasing investment in various affordable housing projects, both public and private.*

Increased public investment has resulted in increased rebate assistance for lower-income residents, plus an expanded stock of publicly owned homes and extended durations for affordable units remaining below market rates.<sup>2</sup>

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[1] [Ending minimum parking requirements was a policy win for the Twin Cities • Minnesota Reformer](#)

[2] [The Way Out of the Housing Crisis: How Minneapolis Stabilized Rents – Brown Political Review](#)

[3] [Cities, suburbs helped ensure housing density measures' defeat \(minnpost.com\)](#)

[4] <https://www.minnpost.com/state-government/2024/02/why-a-sweeping-housing-density-bill-opposed-by-minnesota-cities-suburbs-has-broad-support-in-the-legislature/>

**From:** [Anthony Kunz](#)  
**To:** [DPE Bankstown TOD Mailbox](#); [DPE Hornsby TOD Mailbox](#); [DPIE PDPS St Leonards Crows Nest Mailbox](#); [DPE Homebush TOD Mailbox](#); [DPE Kellyville Bella Vista TOD Mailbox](#); [DPIE Macquarie Park Precinct Mailbox](#)  
**Subject:** FW: Webform submission from: Proposed pathway changes to support Transport Oriented Development  
**Date:** Friday, 23 August 2024 11:30:26 AM  
**Attachments:** [value-advisory-partners\\_response-to-tod-accelerated-precincts\\_explanation-of-intended-effect\\_final.pdf](#)

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**From:** Planning Portal - Department of Planning and Environment

<noreply@feedback.planningportal.nsw.gov.au>

**Sent:** Friday, August 9, 2024 1:49 PM

**To:** DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>

**Cc:** DPIE PA Systems Productivity Policy Mailbox

<SystemsProductivity.Policy@planning.nsw.gov.au>

**Subject:** Webform submission from: Proposed pathway changes to support Transport Oriented Development

Submitted on Fri, 09/08/2024 - 13:43

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am submitting on behalf of my organisation

## Name

### First name

Nic

### Last name

Value Advisory Partners Pty Ltd

**I would like my name and personal contact details to remain confidential**

No

## Info

### Email

[REDACTED]

### Suburb/Town & Postcode

South Yarra

**Please provide your view on the project**

I support it

**Submission file**

[value-advisory-partners\\_response-to-tod-accelerated-precincts\\_explanation-of-intended-effect\\_final.pdf](#) (1.9 MB)

**Submission**

Value Advisory Partners' submission in response to the Proposed pathway changes to support Transport Oriented Development: Explanation of Intended Effect (EIE) is fully contained in our downloaded submission file.

**I agree to the above statement**

Yes

9 August 2024

Mr [REDACTED]  
Director Assessment and Systems Policy  
Department of Planning, Housing and Infrastructure  
Locked Bag 5022  
Parramatta NSW 2124

Dear [REDACTED],

Value Advisory Partners (VAP) appreciates the opportunity to respond to the Department of Planning, Housing and Infrastructure's (the Department) request for feedback to the proposal outlined in the Explanation of Intended Effect (EIE) for *Pathway changes to support Transport Oriented Development*.

Australia and indeed much of the world is facing an acute shortage of affordable housing located where people want to live. To solving the current housing problem in Australia, which is systemic in nature, will require a range of both supply and demand side actions.

The Federal Government's National Housing Accord includes a new national target, agreed to by the Commonwealth, States and Territories at National Cabinet in August 2023, to build 1.2 million new, well-located homes over 5 years, commencing from 1 July 2024. The Accord recognises most of this supply needs to come from the market, with government playing a key role in enabling and kick-starting investment.

Value Advisory Partners is an evidence-based consultancy firm with a focus on creating better places in light of all risks, including climate change. Our results are delivered by understanding and integrating data and insights that bring together "top down" and "bottom up" perspectives from resilient infrastructure management, sustainability assessment, land use planning, infrastructure planning and delivery and placemaking and economics. Our approach makes sense of these macro and micro analyses to optimise outcomes in an environment of temporal, spatial, economic, financial and system change.

We work extensively with Commonwealth, State and local governments in Australia as well as with private sector clients to maximise and sustain the value that can be obtained from their investments.

Key points we emphasise in our submission are:

- There remains a broader opportunity to facilitate "mixed-use" outcomes within TOD precincts. This would help to ensure the character and attributes of place are enhanced for a broader group of beneficiaries, which includes existing resident populations not just future ones.
- A multi-tiered approach to define the precinct boundary for the TOD Accelerated Precincts allows for the density of development to be at different scales and heights depending on distance from the central node identified within the precinct
- Using a 'Precinct Liveability Assessment' Tool can provide insight and be an indicator into the performance of a precinct or TOD. Importantly, the assessment can be completed to show the level of changes – positive and negative – of planned or proposed actions and interventions – such as those being proposed.

- We trust our submission is helpful to your inquiry. Value Advisory Partners would welcome the opportunity to discuss any elements of this submission with you or to present directly.

Yours sincerely

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### Managing Partner

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# Value Advisory Partners response to:

## Pathway changes to support Transport Orientated Development

### Explanation of Intended Effect

## 1. Background

### 1.1 NSW housing targets

Responding to its commitment under the National Housing Accord to deliver 377,000 new well-located homes across the state by 2029, the NSW Government has released 5-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter and Greater Newcastle.

The 43 local government areas (LGA) will each be provided with a 5-year target and housing snapshot that explains how many houses are in the pipeline already and how many more are expected to be delivered. The targets prioritise more diverse and well-located homes in areas with existing infrastructure capacity, such as transport and water servicing.

### 1.2 Transport Oriented Development (TOD) Program

The Transport Oriented Development Program is one of several reforms for diverse low- and mid-rise homes the NSW Government is pursuing to help build up the housing pipeline and deliver more homes in more places. There are two parts to the TOD program:

1. **Part 1** is focused on **TOD Accelerated Precincts** with the aim to create infrastructure and capacity for 47,800 new homes over 15 years. Land within 1,200 metres of 8 rail and metro stations will be rezoned by the NSW Government to allow for more new and affordable homes. These 8 stations are:

Bankstown; Bays West; Bella Vista; Crows Nest; Homebush; Hornsby; Kellyville and Macquarie Park.

**Attachment 1** provides a summary of the proposed zoning and policy changes for each of the TOD Accelerated Precincts.

2. **Part 2** of the program will focus on precincts that have existing infrastructure and are located within 400 metres of 31 stations identified to create capacity for 138,000 new homes over 15 years. New planning controls, delivered through a new State Environment Planning Policy (SEPP), will enable faster delivery of more housing close to jobs and amenity.



### 1.3 Pathway changes to support transit-oriented development – Explanation of Intended Effect (EIE)

Specially to support Part 1 of the TOD Program – TOD Accelerated Precincts - a suite of planning and policy changes are proposed with the aim to:

- Simplify planning controls within the TOD Accelerated Precincts
- Encourage applications for residential developments within the TOD Accelerated Precincts
- Streamline the development applications process
- Ensure developments within the TOD Accelerated Precincts achieve high quality design outcomes
- Encourage proponents to commence construction within two years of planning approval.

Foremost among these proposed changes is a temporary new state significant development (SSD) pathway, to be in place until November 2027, for residential development applications valued over \$60 million.

In addition, to support housing delivery and ensure the strategic intent of the TOD Accelerated Precincts is realised, a number of exemptions from provisions within the eight TOD Accelerated Precincts are proposed:

- Height and floor space bonuses and the associated SSD pathway for in-fill affordable housing will be turned off to avoid conflict with planning controls in TOD accelerated precincts. The state rezoning process will seek to maximise housing delivery including setting affordable housing requirements.
- A 5-year exemption from concurrence and referral requirements that are not considered high-risk in order to speed up assessment timeframes. High-risk concurrence and referrals will be retained to ensure safe and orderly development.
- Exemption from some low- and mid-rise housing reforms to reduce duplication and maximise housing potential.
- Introducing an alternative design excellence pathway in place of design competitions to streamline the delivery of housing while maintaining high-quality design.

### 1.4 Feedback to the proposed pathway changes to support transit-oriented development

The Department is seeking feedback in response to the proposed policy and suite of actions.

Value Advisory Partners' feedback and response draws from our experience over time to support governments and developers to plan for and/or deliver Transport (Transit) Oriented Development (Iskander Regional Development Authority – Malaysia; Malaysian High Speed Rail Corporation; Department of Infrastructure, Transport and Regional Development; Melbourne Metro Rail Authority; Vicinity Centres; Development Victoria; Camellia Landowners Alliance; Ministry of Transport (NZ); Wellington City Council; UDIA NSW; Metro Trains; VicRoads).

While we are not offering immediate responses to the specifics of the proposed policy and suite of actions, we feel there is value to the Department by sharing our observations of the characteristics and attributes of successful TOD's and the risks and opportunities in pursuing a TOD strategy.

## 2. Approach to Transport (Transit) Oriented Development

Transit Oriented Development (TOD) aims to maximise the amount of residential, business and recreational space within walking distance of public transport. It promotes a symbiotic relationship between dense, compact urban form and public transport use. TOD strategy is based on the principle of creating critical mass surrounding a transit hub, with mixed use developments capitalizing on urban designs and functional opportunities.

Further, TOD can be a major contributor to solving the serious and growing problems of climate change and global energy security by creating dense, walkable communities that greatly reduce the need for car dependency and energy consumption.

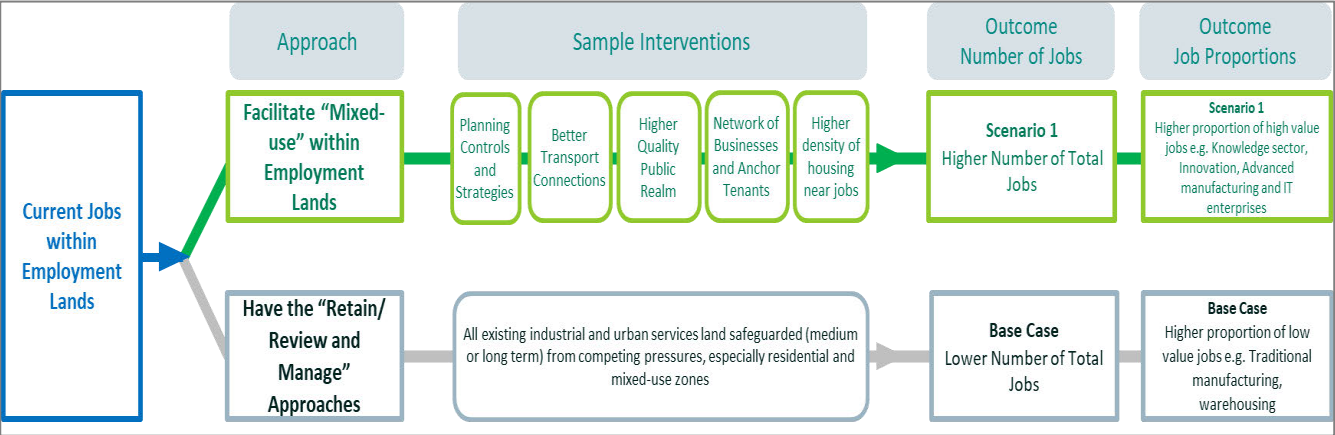
### 2.1 “Mixed-Use” objectives

Noting that the immediate driver of the TOD Program is to deliver new, well-located housing in the next 5 years, with the TOD Accelerated Precincts having a sharper focus on 8 key locations, **there remains a broader opportunity to facilitate “mixed-use” outcomes within TOD precincts.** The aim being to incentivise development that incorporates public realm, commercial and local community uses through interventions that include:

1. **Planning Controls and Strategies:** Changing land use; creating development plans and targeted strategies; reviewing and amending height limits and setbacks; subdividing lots for permeability and improving local accessibility.
2. **Better Transport Connections:** Linking active transport (cycling, pedestrians) to businesses; implementing public transport corridors; prioritising investments in infrastructure for active and public transport.
3. **Higher Quality Public Realm:** Improving quality of streetscape; ensuring built form history and character is utilised (e.g. Heritage control); new and enhanced public open space and parklands; facilitating critical uses such as shops and community facilities accessible by employees and residents.
4. **Network of businesses and anchor tenants:** Enticing large companies and institutions to anchor mixed-use development; creating a network of ‘seed’ or like businesses within a proximity, e.g. small-scale artisan manufacturers.

We note that the draft planning and policy changes proposed for selected of the accelerated precincts identify employment/jobs uplift along with increased dwellings. The approach in Figure 1 is from a study undertaken by Value Advisory Partners for the UDIA (NSW) to investigate the impacts and opportunities for employment land, in particular the trade-offs from retaining or preserving land designated for employment only uses compared with a mixed-use approach. This approach could be adapted for the current TOD program to identify land in the TOD precincts that can support employment creation, in particular local jobs that will serve the new populations the TOD’s will bring.

Figure 1: Impact of facilitation of “Mixed-Use” precincts to achieve greater number of employment and high value jobs



Source: Value Advisory Partners 2023

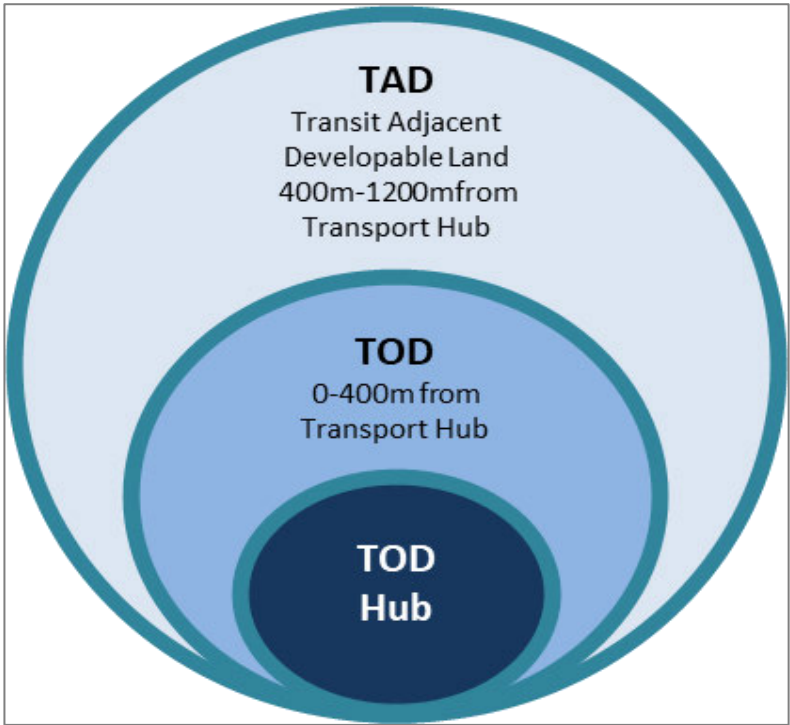
A TOD program focused on mixed-use outcomes will help to ensure the character and attributes of place are enhanced for a broader group of beneficiaries, which includes existing resident populations not just future ones.

## 2.2 Establishing the boundaries for the TOD Accelerated Precincts

The precinct boundaries for the TOD Accelerated Precincts are proposed to be 1,200m. This contrasts with the precincts boundaries for the stations identified for Part 2 of the TOD Program being at 400m.

**A multi-tiered approach to define the precinct boundary for the TOD Accelerated Precincts could be adopted that focuses on facilitating a greater range of development outcomes within a walkable service catchment (up to 1,200m).** By spatially distributing the Precincts over three radial areas (refer to Figure 2), the approach recognises and allows for the density of development being at different scales and heights depending on distance from the central node identified within the precinct, usually a train station.

Figure 2: Tiers of development located within overall Transit Orientated Development Precinct



Source: Value Advisory Partners 2024

- TOD Hub involves any catalytic or facilitated development (e.g. due to rezoning) within the transport hub site/block with direct access to transport commuting
- Transit Oriented Development (TOD) involves facilitated (e.g. due to rezoning) or market development located within 400 metres of transport hub site that can mean walking access to transport within 5 minutes (or 2-minute cycle)
- Transit Adjacent Development (TAD) involves market development located between 400 and 1,200 metres of a transport hub site (up until defined TOD precinct boundary) that can mean walking access to transport within 5-15 minutes (or 5-to-10-minute cycle)

Value Advisory Partners has worked with this more spatially nuanced definition of TOD precinct boundaries for major transport projects in Malaysia:

1. **Malaysia High Speed Rail** - connecting Kuala Lumpur and Singapore with seven new station locations along the high-speed rail corridor in Malaysia. Beyond its purpose as a transport project, MyHSR is positioned as a catalyst towards socio-economic development in Kuala Lumpur and the intermediate cities along the planned corridor, including through TOD strategies for mixed-use development.
2. **Iskander Malay Bus Rapid Transit** - The Iskandar Malaysia Bus Rapid Transit is a multi-trunk bus rapid transit network designed to improve accessibility and connectivity in the city and urban areas of Johor Bahru in the south of Malaysia. Each of the trunks, which service residential, education and tourism regions of the city, has been designed with a primary station hub, intended as a key transport node that would serve to facilitate or catalyse transport-oriented development.

Key insights from VAP's role in these engagements regarding the characteristics for a TOD strategy include:

1. **Transit supportive use** - Transit supportive uses are high pedestrian generators that directly promote greater transit ridership. They provide opportunities for multi-purpose trips that can be made as a pedestrian. Medium to high density residential, offices, high schools and colleges are significant transit supportive uses. Appropriate retail, restaurants, personal service and civic functions will support these major uses and generate activity in both peak and off-peak hours.
2. **Pedestrian connection** - High-quality, grade separated direct walk access is an important feature of successful TOD
3. **Urban design** - Transit centre is a node to a particular area as it has the capability to attract people. As a node, it should include engaging public spaces, attractive street furniture and public arts.
4. **Parking** - By design, TOD lessens the need for car usage in a station area. However, accommodating vehicles is still critical to the success of a vibrant TOD district. Therefore, convenient parking and drop-off zones need to be planned for all TODs.

**Attachment 2** provides a brief case study for the key success factors and lessons learned from the Chatswood Station TOD.

### 2.2.1 Applying a multi-tiered boundary approach to TOD Accelerated Precincts - Bankstown

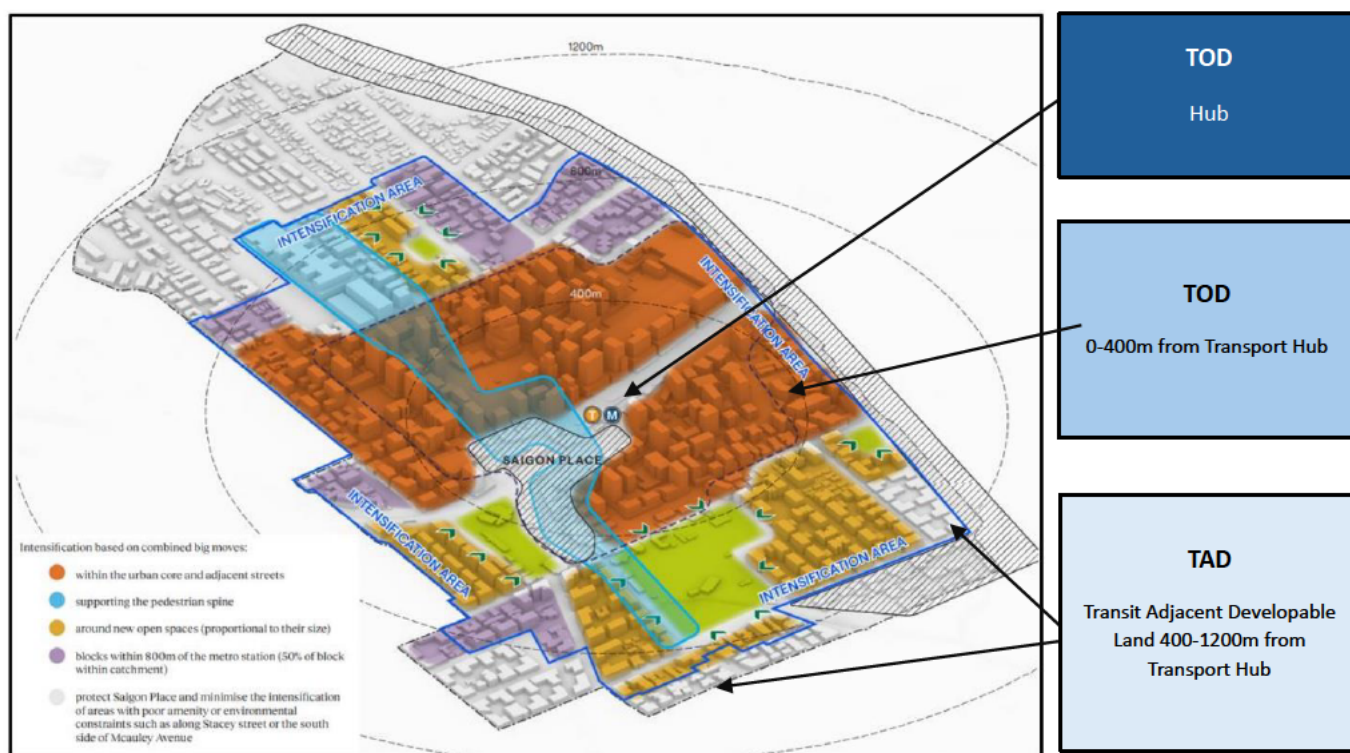
The proposed Bankstown TOD rezoning builds on the vision of the Bankstown City Centre Master Plan (2021).

Key features of the rezoning proposal include:

- Capacity for up to 12,500 new homes within the precinct close to the new Bankstown Metro station
- Mandatory affordable housing contribution of 3–10% for all new residential development in the Precinct, delivering between 375–1,250 affordable homes in perpetuity and managed by a registered Community Housing Provider
- Potential to support 15,000 new jobs in the area
- Potential for new open space, pathways and cycleways.

Figure 3 shows how a multi-tiered approach to setting the precincts boundary for the Bankstown TOD Accelerated Precinct could apply, with the attributes and features of each of the zones as follows:

**Figure 3: Bankstown TOD Framework Plan**



Source: Explanation of Intended Effect: Bankstown – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024

- **TOD Hub**
  - Focuses on land directly surrounding the new train station located on North Terrace, Bankstown NSW.
  - Facilitated development within the TOD hub includes the introduction of the B3 Commercial Core Zone to land centred around the station (generally bound by Chapel Road, Rickard Road and Greenfield Parade) to allow for extensive commercial and high-density residential development in proximity to public transport.

- **Transit Oriented Development (TOD)**
  - Facilitated changes within this area aim to support a transition to a 'high density transport orientated centre' and include:
    - Rezoning of land to accommodate R4 High Density Residential and B4 Mixed Use zone to encourage a mix of land uses at higher densities surrounding the station
    - Amendments to Floor Space Ratio's and Building Heights to facilitate more intensive development.
    - Introduction of a Minimum Non-Residential Floor Space Ratio to select sites within the TOD area to generate employment spaces within close proximity to the Bankstown Station.
    - Activation of street frontages and the implementation of a supporting pedestrian spine to assist in activating the public realm and improve walkability within the precinct.
- **Transit Adjacent Development (TAD)**
  - Involves market development within a 400-1,200m radius from the new Bankstown Metro Station
  - Development within this area is expected to occur at lower densities compared to the TOD and see building heights decrease as the distance to the station increases. Development is also expected to be orientated around key open spaces and active transport corridors to maintain connectivity with the new train station and facilitate high quality public realm outcomes.

## 3. Accelerated Transit Oriented Development: Risks and Opportunities

### 3.1 Identifying key gaps in liveability within TOD precincts and areas to address

The 'Precinct Liveability Assessment' can provide insight and be an indicator into the performance of a precinct and the proportion of key liveability measures currently delivered, to gain an understanding of the extent an area is effective in being thriving, vibrant and liveable for its residents and workers.

It assesses against the many of government's objective for "suburban centres to become vibrant hubs where living, working and socialising hubs, allowing people to meet the most of their everyday needs within a 20-minute walk, cycle or public transport trip from their home."

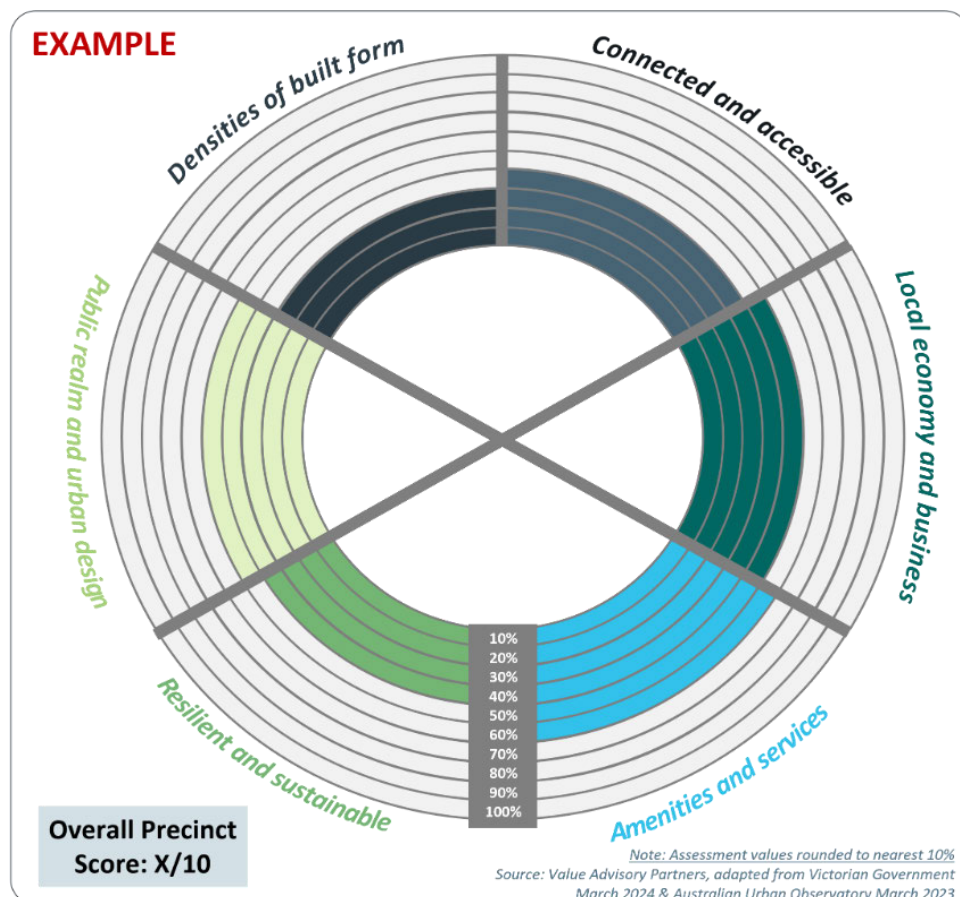
This assessment can identify key gaps in the overall liveability of a precinct, and where opportunities of adding amenity and local connectivity could occur.

Figure 4 describes the attributes that comprise the assessment and the thresholds (10% - 100%) for scoring a precincts performance:

- Connected and accessible: Immediate access to public transport; High quality pedestrian infrastructure; Safe and connected cycling routes
- Local economy and business: Employment opportunities available in range of workspaces; Commercially viable activity centre with range of businesses connected to residents and workers
- Amenities and services: Presence of education services including schools and childcare; Community facilities co-located with amenities; Presence of range of health services
- Resilient and sustainable: Presence of fresh produce and healthy local food options; Built form with high energy efficiency and building performance; Green spaces with cooling effects allowing for stormwater management and biodiversity
- Public realm and urban design: Places for public engagement including presence of arts, culture and relevant spaces; range of sports and recreation facilities and clubs; inclusion of high quality public open space
- Densities of built form: Mix of housing typologies and densities within sub-precincts; well-designed streetscapes between key nodes of activity and connectivity; affordable housing included in development



Figure 4: Example of 'Precinct Liveability Assessment' summary showing overall scores



Source: Value Advisory Partners 2024 (adapted from Victorian Government "20 Minute Neighbourhood" Framework).

Importantly the assessment can be completed as both an indicator of current performance and to show the level of changes – positive and negative – of planned or proposed actions and interventions.

Value Advisory Partners is currently applying the 'Precinct Liveability Assessment' with stakeholders of a transformational mass transit project in Victoria to understand the liveability impacts and outcomes from transit design at station nodes with precinct catchments of up to 1,600m.

### 3.2 Value Creation and wider benefits for multiple beneficiaries in TOD precincts

Incorporating value creation concepts and analysis into pathways for TOD development allows for further investments, beyond the core transit infrastructure, that create new and/or additional benefits for a wider range of beneficiaries. By adopting value creation principles one of the key objectives is to encourage government interventions, such as transit capital investments, to consider the environmental, social and economic value government investment and public value that can be created beyond the core scope of the project.

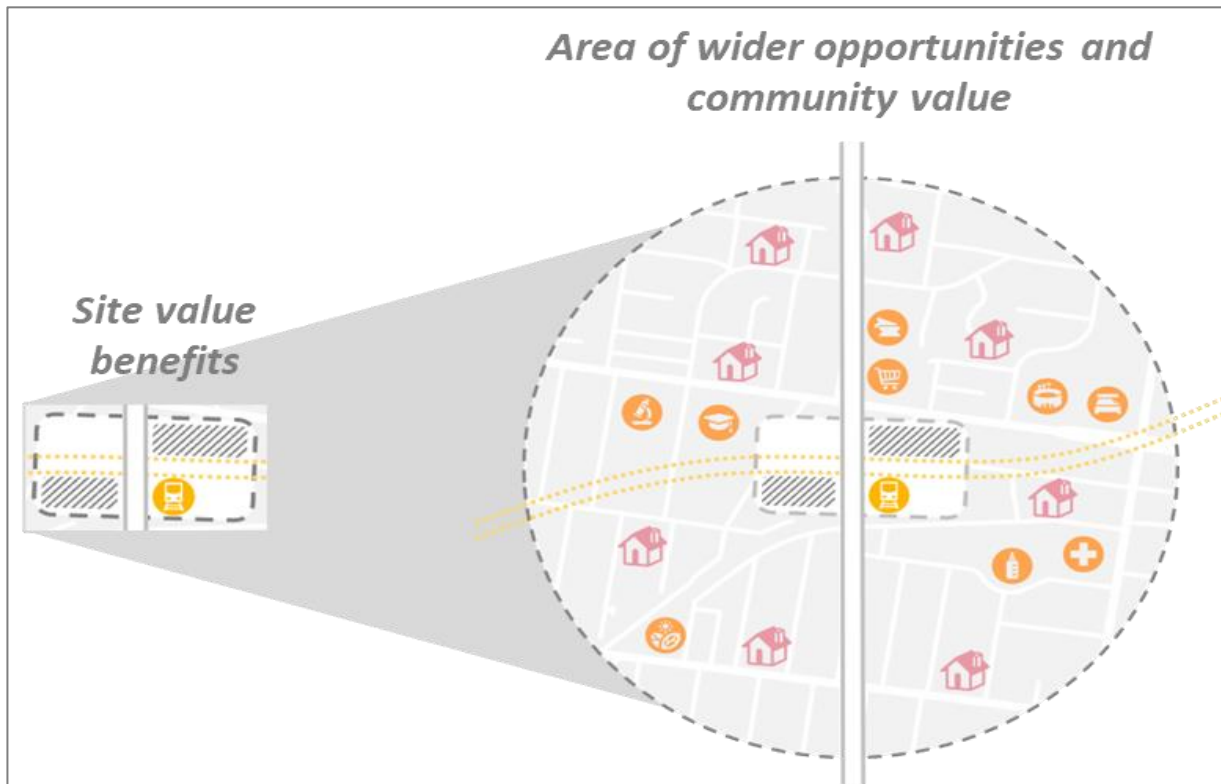
This can be achieved through delivery of core services including local amenities and transport connectivity by incorporating key principles:



## 1. Plan for maximising value to the community from the project

- Assess community needs or gaps in connectivity, services and amenity; and how these opportunities might be delivered on the project site or leveraged for delivery within the area – refer to Figure 4 for framework for a 'Precinct Liveability Assessment'
- Identify who the beneficiaries are, and equally important what disbenefits may be created
- Focus on the whole area - from the site of the infrastructure to a wider catchment.
- The diagram below shows an example of how wider opportunities can maximise value for a TOD precinct in development

**Figure 5: The value creation equations**

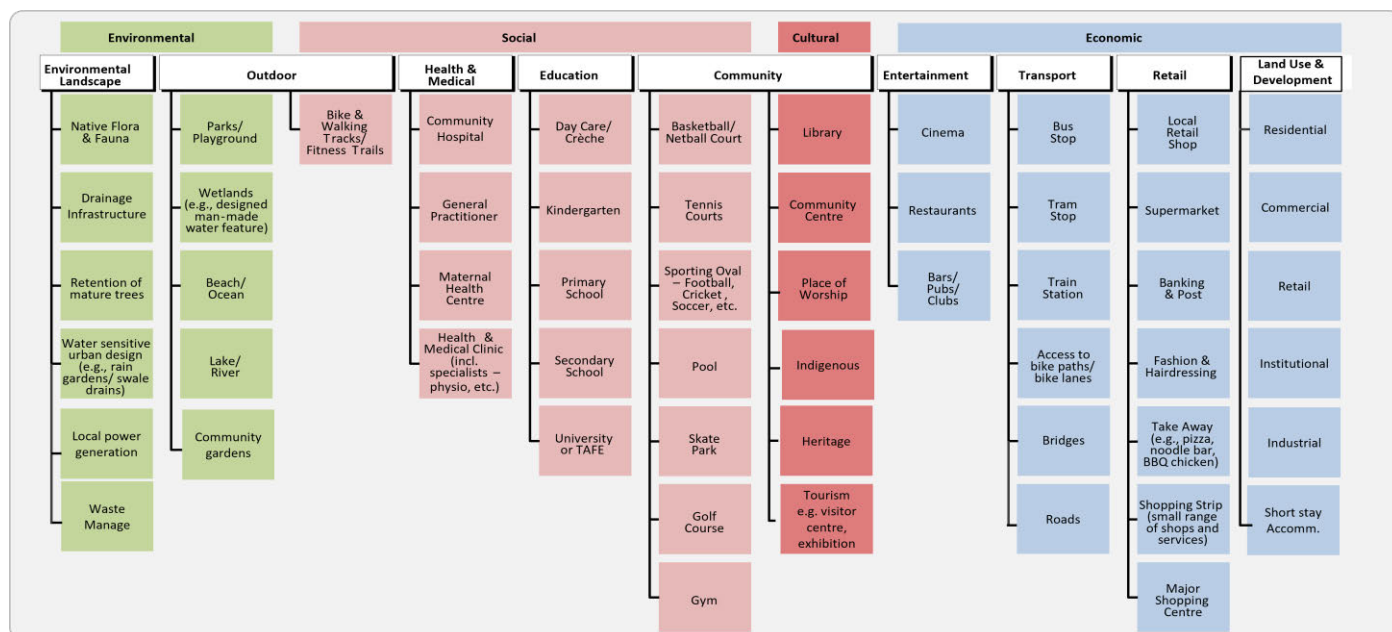


Source: Value Advisory Partners 2024

## 2. Quantify the value created for beneficiaries

- Links the specific infrastructure element or 'opportunity' to the benefits it creates for each relevant beneficiary.
- Examples of the wide range of environmental, social, economic and cultural value opportunities to create value are seen below in Figure 6
- The value approach begins with four critical questions: What benefits will be created? Who will benefit? Where and when the benefit will occur? And What quantity of value would be created?

**Figure 6: Wide range of local opportunities potentially incorporated into TOD precinct development**



Source: Value Advisory Partners 2024

## 4. Closing comments

Value Advisory Partners recognises the systemic nature of the challenges in front of governments, industry and the community to change the trajectory of access to affordable, well-located housing. We commend the NSW government and the Department broadly in its actions to support the National Housing Accord, and specifically for the TOD Program and within that, the TOD Accelerated Precincts.

The thrust of Value Advisory Partners feedback and response to the proposed zoning and policy changes to support activation within the TOD Accelerated Precincts is less about the specific policy and planning enablers and more directed toward the hallmarks, characteristics and liveability outcomes that are possible from well planned, design and delivered TOD's.

Key points we emphasise in our submission are:

- There remains a broader opportunity to facilitate “mixed-use” outcomes within TOD precincts. This would help to ensure the character and attributes of place are enhanced for a broader group of beneficiaries, which includes existing resident populations not just future ones.
- A multi-tiered approach to define the precinct boundary for the TOD Accelerated Precincts allows for the density of development to be at different scales and heights depending on distance from the central node identified within the precinct
- Using a 'Precinct Liveability Assessment' Tool can provide insight and be an indicator into the performance of a precinct or TOD. Importantly, the assessment can be completed to show the level of changes – positive and negative – of planned or proposed actions and interventions – such as those being proposed.
- The opportunity of integrating value creation concepts and analysis into pathways for TOD development to consider the environmental, social and economic value government investment and public value that can be created beyond the core scope of a project.

# ATTACHMENT 1

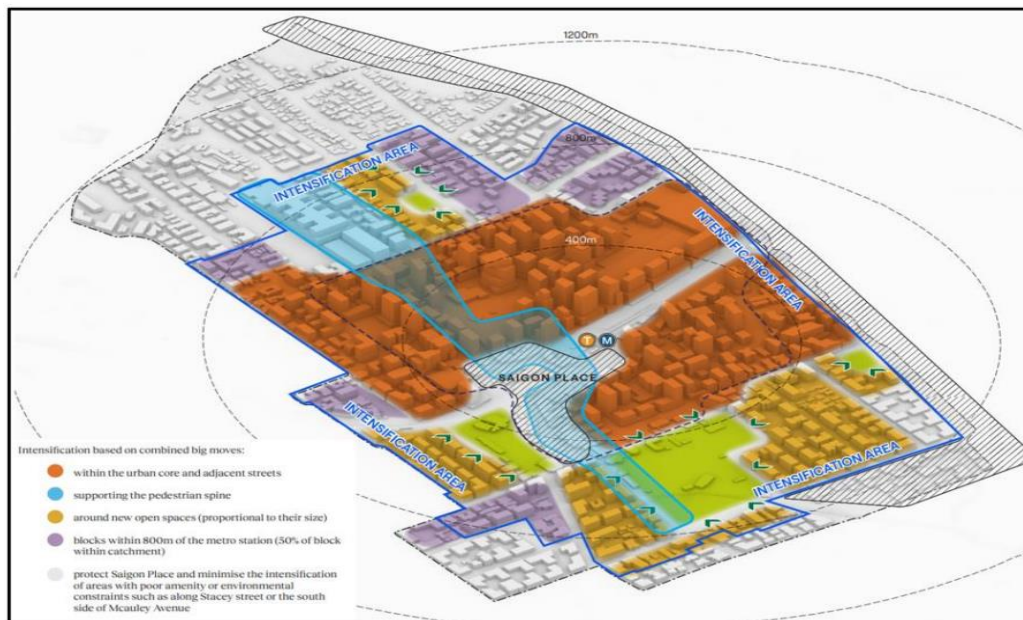
## TOD Accelerated Precincts – Overview

The TOD Accelerated Precincts comprise 8 priority high growth areas near transport hubs in Greater Sydney selected for accelerated rezoning. The accelerated precincts and proposed zoning and policy changes are as follows:

### 1. **Bankstown:**

- Facilitate rezoning to allow densification of development within an 800m of the metro station including:
  - Rezoning R3 Medium Density Residential Zones to R4 High Density Residential Zones towards the south of the precinct to allow for greater heights
  - Introduce B3 Commercial Core zone to land centred around the station to provide for extensive commercial and high-density residential development within close proximity to public transport.
  - Extension of B4 Mixed Use Zone and RE1 Public Recreation Zone to encourage activity closer to open spaces.
  - These changes are expected to facilitate 12,500 new dwellings and 15,000 additional jobs.
- Increases in Floor Space Ratios and Building Heights to facilitate more intensive development, concentrated around the precinct core and transitioning downwards closer towards the borders of the precinct.
- Selection of a number of key sites around the core and along Chapel Road identified to deliver a proposed minimum amount of non-residential floor space to generate employment spaces close to Bankstown Station.
- Activation of street frontages and the implementation of a supporting pedestrian spine to assist in activating the public realm and improve walkability within the precinct.
- Mandatory affordable housing contributions of 3-10% for all new residential development within the precinct
- Investigations aimed at strengthening Sustainability and Design Excellence within the precinct
- New subclause to allow extended operating hours and provide greater flexibility for late night operation

**Figure 7: Bankstown TOD Framework Plan**



**Source:** Explanation of Intended Effect: Bankstown – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024

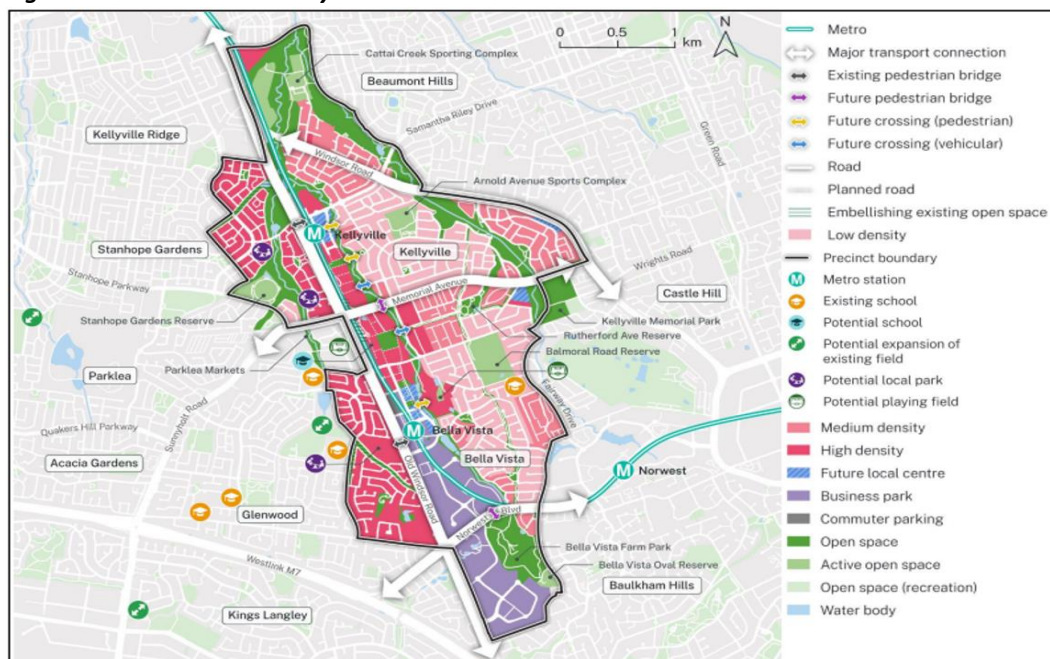
## 2. Bays West:

- Bays West Stage 2 Rezoning will be available for public consultation in mid-2025. Stage 1 was finalised as of 2022, however, it is expected that rezoning proposals for Stage 2 will build upon Stage 1 and aim to deliver more homes sooner within a vibrant new precinct.

## 3. Bella Vista and Kellyville:

- Facilitate accelerated rezoning across 4 sub-precincts within the immediate vicinity of the two nominated metro stations including:
  - Kellyville: Rezoning of existing low-medium residential land to R4 High Density Residential as well as changes to Floor Space Ratios and Building high to accommodate higher densities, allowing for 9901 potential dwellings to be developed.
  - Bella Vista: Rezoning of existing low-medium residential land to R4 High Density Residential as well as changes to Floor Space Ratios and Building high to accommodate higher densities, allowing for 10806 potential dwellings to be developed. Current commercial floorspace will also be retained to ensure the precinct remains employment focused.
  - Glenwood: Rezoning of existing low-medium residential land to R4 High Density Residential as well as changes to Floor Space Ratios and Building high to accommodate higher densities, carefully master planned around existing and new open spaces to ensure high amenity for future residents. This would allow for approximately 12603 potential dwellings to be developed.
  - Stanhope Gardens: Rezoning of existing low-medium residential land to R4 High Density Residential as well as changes to Floor Space Ratios and Building high to accommodate higher densities, allowing for 9528 potential dwellings to be developed.
- Mandatory affordable housing contributions of 3-8% for all new residential development within the precinct. No additional affordable housing incentives will be provided including infill Floor Space Ratio and Building Height Bonuses of the Housing SEPP 2021.
- Implementation of potential active transport links to support TOD Rezoning.

**Figure 8: Bella Vista and Kellyville TOD Precinct Structure Plan**



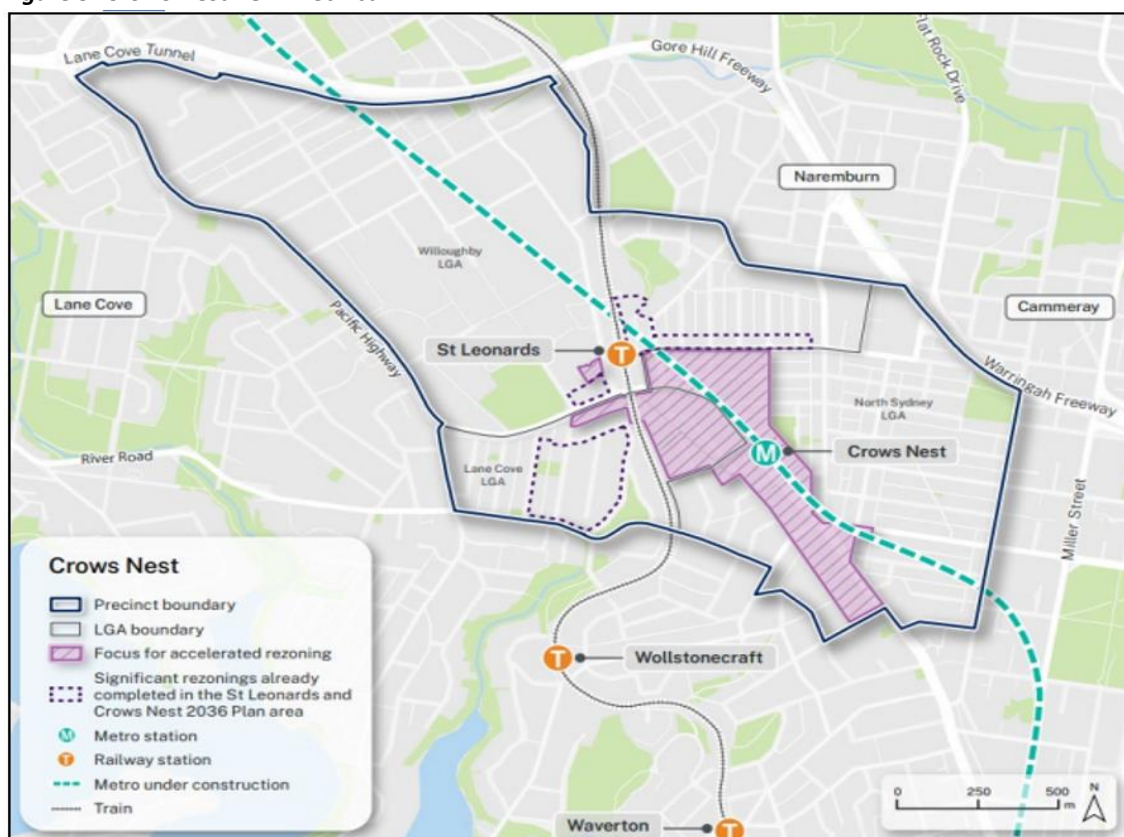
**Source:** Explanation of Intended Effect: Bella Vista and Kellyville – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024



#### 4. **Crows Nest:**

- Focus accelerated rezoning to land immediately surrounding the precinct including:
  - Rezoning portions of existing E2 Commercial Centre Zones to MU1 Mixed Use and low-medium residential and E1 Local Centre Land to R4 High Density Residential. Amendments to increase current heights and Floor Space Ratios are also proposed to allow for greater building densities to be achieved.
  - These changes are expected to enable 3255 new homes and 2600 jobs
- Amendments to minimum non-residential FSR's to various sites throughout the precinct to accommodate further employment.
- Introduction of mandatory affordable housing contributions of 10-15% for all new residential development within the precinct. Bonus FSR's and Building Height Incentives are also provided within key sites that meet the provision of 15% affordable housing. No additional affordable housing incentives will be provided including infill Floor Space Ratio and Building Height Bonuses of the Housing SEPP 2021.
- Investigation into the creation of further open space opportunities to support development uplift.

**Figure 9: Crows Nest TOD Precinct**

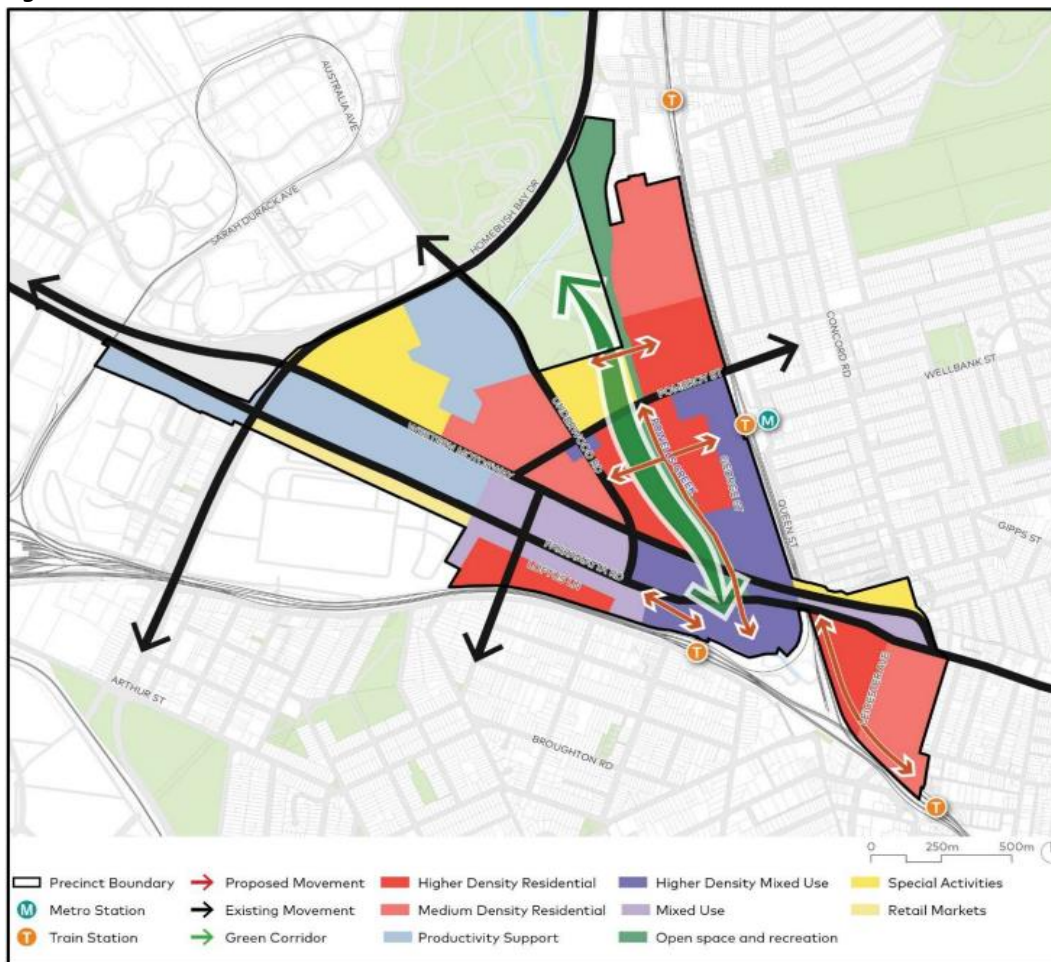


**Source:** Explanation of Intended Effect: Crows Nest – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024

## 5. Homebush:

- Facilitate rezoning including:
  - R2 Low Density and R3 Medium Density Residential to R4 High Density Residential
  - Rezoning R4 High Density Residential zones to MU1 Mixed Use zone
  - E1 Local Centre and E2 Commercial zones and part of the R2 Low Density residential to MU1 Mixed Use zone to promote a vibrant and mixed used area
  - E4 General Industrial Zone to E3 Productivity Support Zone to enable 'Retail Premises'
  - These changes are expected to see the creation of 16100 new homes and 2670 new jobs
- Amendments to maximum Floor Space Ratio's and Building Heights across numerous sites to provide further capacity for new housing and jobs.
- Mandatory affordable housing contributions of 5-10% for all new residential development within the precinct. No additional affordable housing incentives will be provided including infill Floor Space Ratio and Building Height Bonuses of the Housing SEPP 2021.
- Investigations aimed at strengthening Open Space networks and Design Excellence within the precinct
- Activation of street frontages along key employment corridors to increase safety, amenity and walkability within the precinct.

**Figure 10: Homebush TOD Precinct Structure Plan**

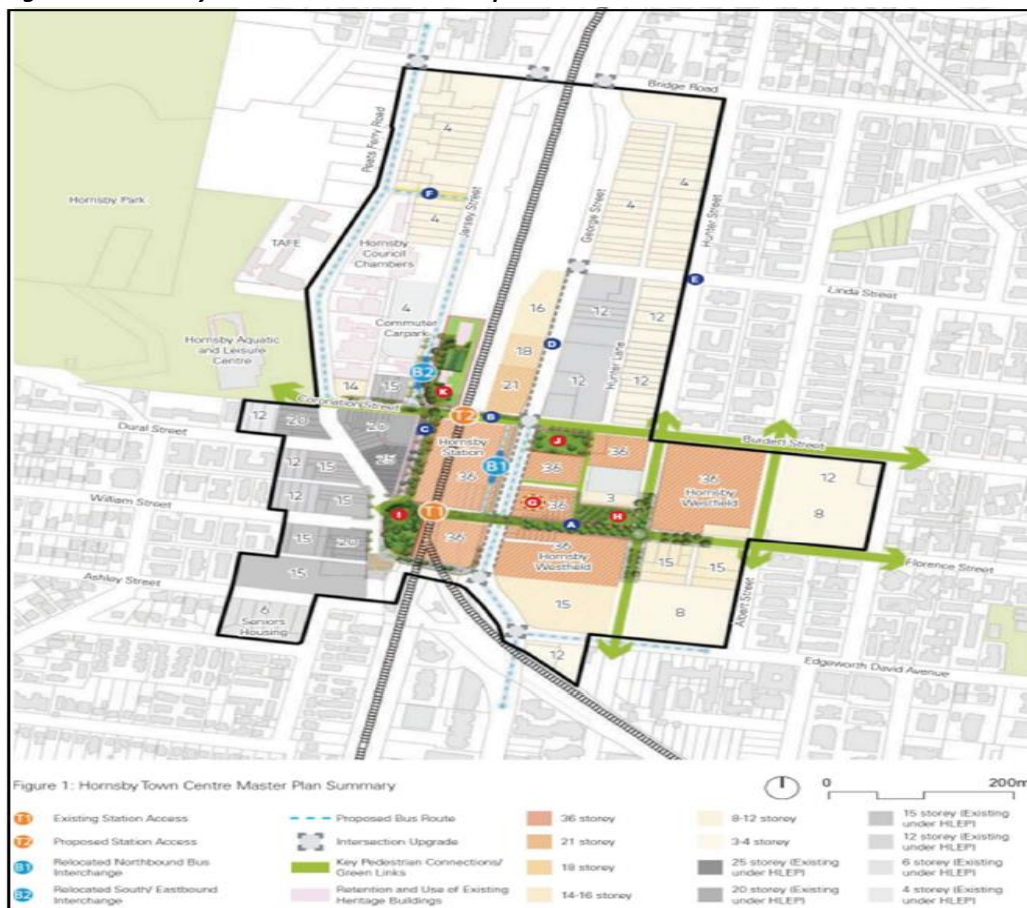


**Source:** Explanation of Intended Effect: Homebush – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024

## 6. Hornsby:

- Facilitate rezoning including:
  - Extension of the MU1 Mixed Use Zone and remove E2 Commercial Centre Zone to facilitate a greater mix of land uses, including residential, within the precinct.
  - Extend the MU1 Mixed Use Zone over land within the Transport Corridor Area to allow for a greater mix of land uses, including residential.
- Inclusion of an Urban Design Framework to guide development within Hornsby to provide approximately 5000 new dwellings and capacity for 3450 new jobs.
- Increase allowable Floor to Space Ratio's and Building Heights to facilitate more intensive development
- Introduce a minimum non-residential FSR within the precinct to ensure commercial floor space is retained and remove the existing residential cap.
- Mandatory affordable housing contributions of 5-10% for all new residential development within the precinct. No additional affordable housing incentives will be provided including infill Floor Space Ratio and Building Height Bonuses of the Housing SEPP 2021.
- Investigations into the potential delivery of new open space networks throughout the precinct.
- Investigations into the inclusion of provisions for minimum lot sizes for the redevelopment of land within the precinct.

**Figure 11: Hornsby TOD Town Centre Masterplan**



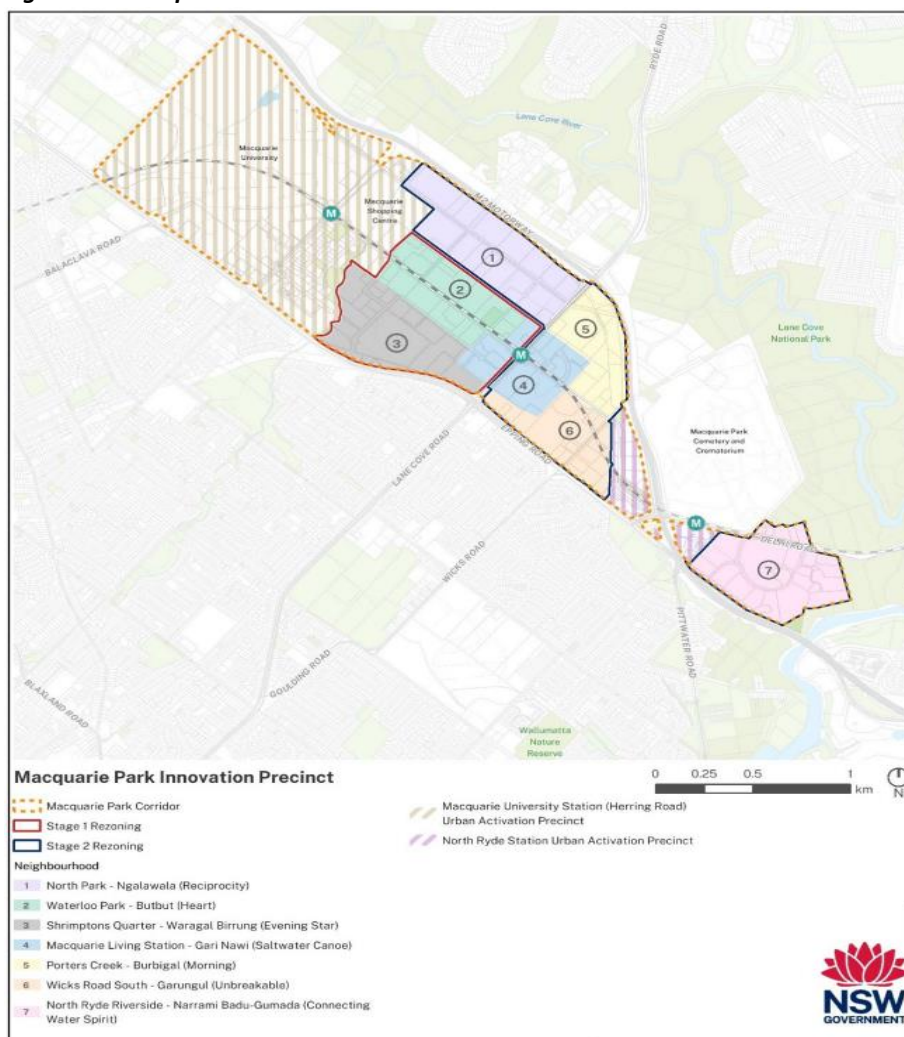
**Source:** Explanation of Intended Effect: Hornsby – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024



## 7. Macquarie Park:

- Facilitate rezoning of the Stage 2 Area including:
  - Rezone specific lots to MU1 Mixed Use, RE1 Public Recreation and SP2 Infrastructure Zone to facilitate a mixed-use precinct capable of achieving higher densities and better amenity outcomes.
  - These changes are expected to deliver 4622 new dwellings within the MU1 Mixed Use Zone and approximately 66,327 additional jobs or 5096 additional dwellings depending upon market demand
- Increase allowable Floor to Space Ratio's and Building Heights to facilitate more intensive development
- Greater Building Heights and Floor Space Ratio's incentives for specific sites that meet certain requirements including minimum site area, minimum areas for open spaces and roads and other associated infrastructure.
- Mandatory affordable housing contributions of 10-15% for all new residential development within the precinct. No additional affordable housing incentives will be provided including infill Floor Space Ratio and Building Height Bonuses of the Housing SEPP 2021.
- Introduction of minimum non-residential FSR's to various sites throughout the precinct to generate further employment opportunities.
- Inclusion of extended design excellence provisions for sites within Stage 2 to ensure development outcomes.

**Figure 12: Macquarie Park TOD Innovation Precinct**



**Source:** Explanation of Intended Effect: Macquarie Park – Transport Orientated Development Precinct  
Department of Planning, Housing and Infrastructure, 2024



# ATTACHMENT 2

## Case Study – Sydney Chatswood Station TOD

### **Key Features**

- Chatswood is part of the commercial precinct created at the Chatswood Transport Interchange: involved an upgrade of station to cater for new \$2.2 billion Epping-to-Chatswood line
- High-density TOD surrounding the built environment
- Transport Infrastructure Development Corporation (TIDC) is state-owned corporation responsible for delivering Interchange
- TIDC entered into JV in 2005 with developers to build TOD
- TOD comprises bus and taxi interchange and construction of retail/residential complex
- 80 retail outlets, 500 residential units within three towers

**Figure 13: Sydney Chatswood Station TOD**



### **Key Success Factors**

- High market demand for residential space above station which was sold prior to construction
- Average increase of \$58K in prices per housing unit once station was in operation
- Increase decreased \$18K per unit for each km further from station

### **Lessons Learnt**

- Recession caused retail and residential components to be delayed considerably, led to insolvency of initial developer
- Interchange was completed in 2008 but TOD took another 3 years once private developers bought the site
- Construction costs increased above budget due to complexity of building above rail station

# ATTACHMENT 3

## About Value Advisory Partners:

Value Advisory Partners is an evidence-based consultancy firm specialising with a focus on creating better places by understanding and integrating data and insights that bring together “top down” and “bottom up” perspectives from land use planning, infrastructure planning and delivery and placemaking and economics.

Our purpose is to meet decision makers’ need for evidence-based, actionable advice to better plan and deliver adaptable places in our cities, regions and rural areas for today and for a climate resilient future.

We do this by understanding and integrating data and insights that bring together “top down” and “bottom up” perspectives. Value Advisory Partners makes sense of these macro and micro analyses to optimise outcomes in an environment of temporal, spatial, economic, financial and system change.

We apply these methods across a range of uses: master plans, business cases, precinct planning and delivery, funding strategies and resilient infrastructure investment.

Using agile visualisation technology, we empower our clients to use these analyses to challenge assumptions, test scenarios, develop and prioritise options and optimise resilient outcomes. We always strive to build efficiency through innovative methods and effective solutions which maximise benefits and results for our clients, business partners and our communities.

Value Advisory Partners modelling and expertise has been utilised by state and Commonwealth governments and infrastructure providers for urban planning, transport infrastructure design and implementation, property development, social infrastructure delivery and employment zone development. Our models are being employed by both the Australian and New Zealand Governments for their current infrastructure project planning.

## Panels & Memberships

Value Advisory Partners expertise has been recognised by appointment to:

1. The **New South Wales Prequalification Scheme: Performance and Management Services** for:
  - 15. Infrastructure
    - 15a. Strategy and Planning
2. **Whole of Victorian Government Professional Advisory Services Panel** to provide specialist advice based on “best value for money in terms of price, quality and service delivery” for the following **Commercial and Financial Advisory Services**:
  - Strategic Policy Review and Reform Project Development (incorporating service need analysis, service planning, feasibility studies and strategic assessments)
  - Business Case Preparation and Development
  - Market Engagement and Implementation
  - Project, Program and Business Review (incorporating business re-organisation reviews), and
  - General Commercial Advice (incorporating Commercial negotiations)

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Friday, 23 August 2024 1:52:19 PM  
**Attachments:** [objection-to-the-manson-rd-open-space.docx](#)

---

Submitted on Fri, 23/08/2024 - 13:49

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Mary

### **Last name**

Farrell

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2135

### **Please provide your view on the project**

I object to it

### **Submission file**

[objection-to-the-manson-rd-open-space.docx](#) (9.35 MB)

### **Submission**

Please find attached my submission objecting to the proposed Manson Road open space

### **I agree to the above statement**

Yes

I strongly object to the proposed Manson Rd Open space. This is arbitrary, unnecessary and unfair to the owners of these properties

### **1) UNFAIRNESS**

The proposal unfairly burdens only four property owners on Manson Rd and Swan Avenue. This selective approach is inequitable. While these property owners face potential devaluation of their homes, the remaining properties on the street will benefit from upzoning. This creates a stark imbalance—why should these few properties be penalised while others gain from the rezoning? It is neither fair nor reasonable to single out these properties. Instead, the entire area should be rezoned consistently to ensure equitable treatment for all property owners.

### **FSR ALLOCATION**

Page 48 of the Homebush State-led Rezoning states:

*“Proposed open spaces and new streets anticipated to be delivered as part of a private development are assumed to adopt the adjoining lots FSR. Development sites that are also delivering open space can utilise the full FSR allocated to that site and redistribute that density to the developable parts of the site.”*

However, there is no guarantee this FSR allocation will be maintained indefinitely into the future. A subsequent rezoning decision could overturn this at any time.

Imagine a scenario where all the lots on the Manson Rd/Swan Avenue block are developed into apartments with the exception of those containing open spaces because there is no developer interest in those lots with open spaces. A rezoning change could occur, allowing developers to build apartments anyway without the need to acquire the FSR of the adjoining open spaces. This could result in a 15-storey apartment block towering right next to my “open space” house, causing significant and detrimental impacts for me.

**I submit the proposal to allocate FSR to adjoining developable sites is grossly unfair to the owners in the open spaces. The final rezoning should ensure that open space/green space allocation is shared equitably amongst all property owners of Swan Avenue and Manson Road.**

## **2) RANDOMNESS AND INCONSISTENCY**

Page 59 of the document Homebush State-led rezoning Urban Design Report states:

*"East-west through-lot connections between Swan Avenue, Manson Road and Leicester Avenue should be located beside heritage items, to provide separation from new infill development."*

This recommendation specifically targets the heritage-listed house at 20 Swan Avenue. However, the criteria for heritage listing seems inconsistent and arbitrary, as seen by the photographs which I took on 10 August 2024.



- heritage listed



- earmarked for demolition



██████████ should not be heritage listed. It appears to be heritage listed because it has been restored and painted in Federation colours with a picket fence. An almost identical house at ██████████, which has a brick fence is slated for demolition. This approach seems arbitrary and unfair, lacking a coherent rationale or consistent criteria.

My house has been designated as an open space simply because it happens to be adjacent to the heritage listed house as ██████████, which I submit is wrongly classified as heritage.

Both heritage listings and the planning of open spaces have been decided in an inconsistent, random, arbitrary and inequitable manner.

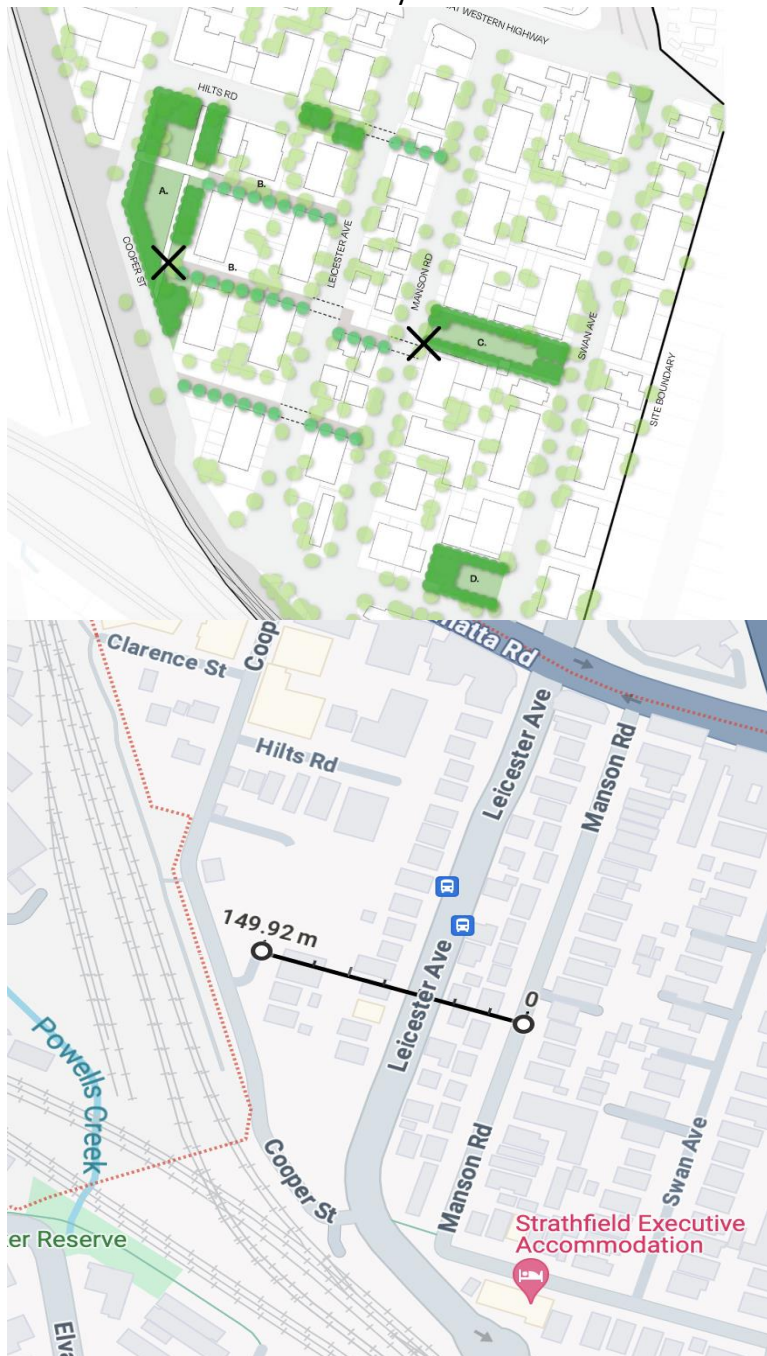
### 3) EXISTING GREEN SPACE: COOPER STREET PARK

The Strathfield Triangle area is already well-served by the expansive 4,900 square metre Cooper Street Park, which is ideally situated for residents both east and west of Leicester Avenue.

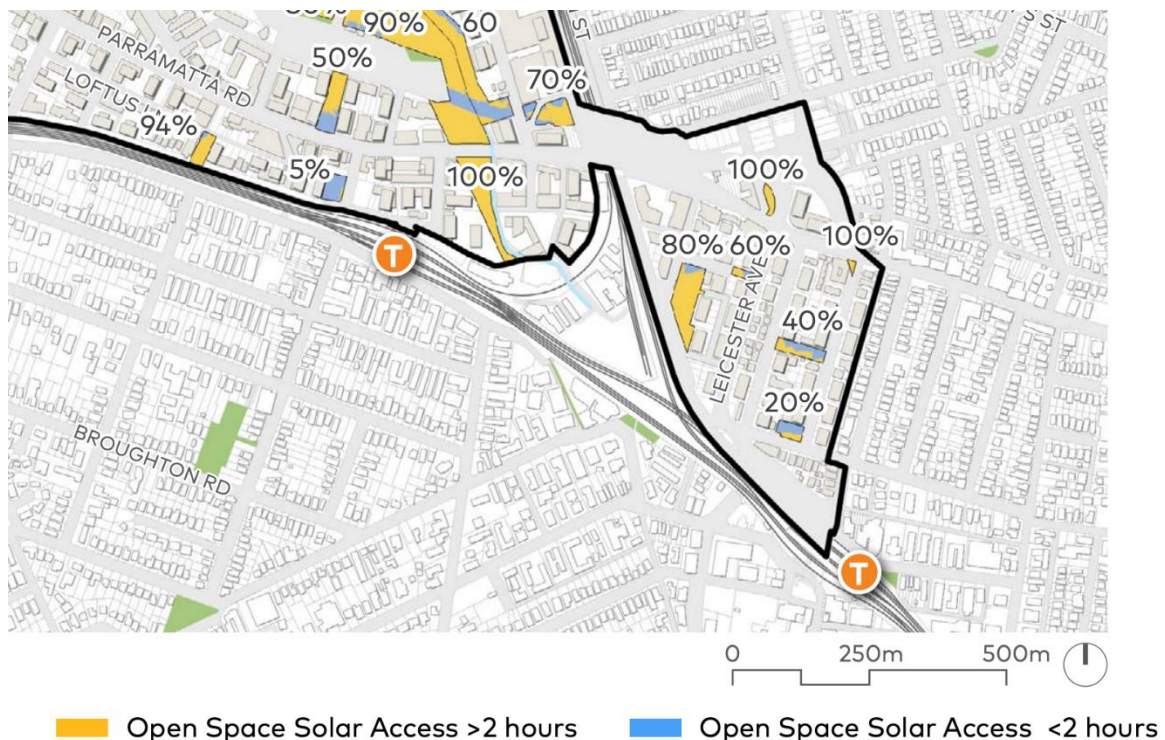
The [Homebush Precinct Public Domain Strategy Report](#) on page 27 states:

*"Ensure small parks are provided within a 200m walking catchment of all residences."*

According to Google maps, the centre of Manson Road is less than 150 metres from Cooper Street Park. Given this proximity, the establishment of another small park so close by would be redundant and unnecessary.



**Solar Access:** Page 41 of the Homebush State-led Rezoning Urban Design Report reveals that while 80% of Cooper Street Park will receive two hours of sunlight between 9 a.m. and 3 p.m. on the winter solstice, only 40% of the proposed east/west Manson Road open space will receive the same sunlight. This means an area of only 760 square metres of the proposed Manson Rd open space will have more than 2 hours of sunlight on the winter solstice. Much of the Manson Road open space will be in darkness, reducing its usability and effectiveness.



The Cooper Street Park covers an area of 4,900 square metres, compared to just 1,900 square metres for the Manson Road open space. It is conveniently located less than 150 metres from the Manson Road open space.

Given its superior size, better sunlight exposure, and close proximity, I submit that the Manson Road open space is redundant and unnecessary.



#### **4) EXISTING SPACE BETWEEN MANSON ROAD AND SWAN AVENUE**

The block between Manson Road and Swan Avenue spans approximately 91 metres in width, according to Google maps. This ample width makes it entirely feasible to develop a "garden park-like" environment within this block. Given this generous size and the proximity of the Cooper Street Park, I submit there is a strong case for eliminating the need for the proposed east/west open space on Manson Road.

The shaded blue area below illustrates the space situated in between the proposed apartment developments on Manson Road and Swan Avenue connecting to Cooper Street.



This open space runs north/south along the entire length of the Manson Road/Swan Avenue block, seamlessly connecting to Cooper Street. It is a generous and expansive area, offering direct access to all apartment residents and also providing public access via Cooper Street.

In contrast, the proposed east/west open space on Manson Rd is substantially smaller with limited direct door access for residents and less effective due to limited sunlight, rendering it useless as a park.

This north/south open space park would facilitate indoor/outdoor living opportunities for all residents, with potential features such as tree canopies, community gardens and vegetable plots. These enhancements would improve the environment and offer residents on both Manson Road and Swan Avenue access to greenery. It would strengthen community ties and create a sense of belonging, especially if garden and vegetable plots are incorporated into the design.

**To ensure fairness, the north/south green space should be incorporated into all development lots along Manson Road and Swan Avenue in an equitable way**

## **5) PROPOSAL FOR REDUCED STREET SETBACK**

I propose that the building setback for both Manson Road and Swan Avenue be reduced from 6 metres to 2 metres. This adjustment would create an additional 8 metres of open space between the proposed apartments on Manson Road and those on Swan Avenue. Reducing the setback would not only enhance the spatial openness and improve the aesthetics of the area but also provide a more integrated and accessible communal space for residents.

## **6) INCORPORATE GREEN SPACES WITHIN APARTMENTS BLOCKS**

Instead of designating Manson Road as an open space, I propose integrating green spaces directly within apartment blocks.

**Rooftop Gardens:** Mandating rooftop gardens for all apartment blocks would provide valuable green space and recreational areas for residents, enhancing both aesthetics and quality of life.

**Vertical Gardens:** Additionally, incorporating vertical gardens on building facades could further integrate greenery into the design, improving the urban environment and contributing to sustainability.

**Enhanced Communal Areas:** Increasing the Floor Space Ratio (FSR) and building height would allow for the allocation of entire floors as communal spaces such as libraries, lounges, child-care centres and swimming pools.

For example:

- Boorloo is a 29-storey build-to-rent development in Perth, features a landscaped podium on level 7.
- World Tower Child Care on level 14, Liverpool St Sydney

## **7) STRATHFIELD TRAIN STATION**

Strathfield train station is a major interchange. It is a highly connected train station providing direct access across the Sydney train network in all directions to the north, south, east and west **(Appendix A)**

- north (Epping, Hornsby, Chatswood)
- south (Fairfield, Liverpool)
- east (Ashfield, Redfern, Central)
- west (Parramatta, Penrith)

Strathfield train station also serves as a pivotal intercity and regional hub, offering direct train services to Katoomba, Gosford, Newcastle, Brisbane, Dubbo, Broken Hill and Tamworth **(Appendix A)**

Its exceptional connectivity and high frequency of services make it a prime candidate for increasing the FSR and building heights for nearby apartment developments. Enhancing these parameters aligns with the Strathfield's strategic importance and supports more efficient use of its excellent transport links.

# APPENDIX A

(Sample train timetables from Strathfield Station)



Monday to Friday	6	6	6	6	6	6	6	6	6
Central	i07:15	i07:45	i08:15	i08:45	i09:15	i09:45	i10:15	i10:45	i11:15
Strathfield	07:28	07:58	08:28	08:58	09:28	09:58	10:28	10:58	11:28
Epping	07:40	08:10	08:40	09:10	09:40	10:10	10:40	11:10	11:40
Hornsby	07:53	08:23	08:53	09:24	09:53	10:23	10:53	11:23	11:53
Asquith	—	08:26	—	—	—	—	—	—	—
Berowra	—	08:34	—	09:33	—	10:33	—	11:32	—
Cowan	—	08:38	—	09:38	—	10:37	—	11:37	—
Hawkesbury River	—	08:48	—	09:48	—	10:47	—	11:47	—
Wondabyne	—	a08:55	—	a09:55	—	a10:54	—	a11:54	—
Woy Woy	08:27	09:02	09:28	10:01	10:28	11:01	11:28	12:01	12:28
Koolewong	08:30	09:04	—	10:04	—	11:03	—	12:04	—
Tascott	08:33	09:07	—	10:06	—	11:06	—	12:06	—
Point Clare	08:35	09:09	—	10:08	—	11:08	—	12:08	—
Gosford	08:40	09:14	09:36	10:13	10:36	11:13	11:36	12:13	12:36
Narara	08:45	09:19	—	10:18	—	11:18	—	12:19	—
Niagara Park	08:48	09:21	—	10:20	—	11:20	—	12:21	—
Lisarow	08:50	09:24	—	10:23	—	11:23	—	12:23	—
Ourimbah	08:53	09:26	—	10:26	—	11:25	—	12:26	—
Tuggerah	08:59	09:32	09:51	10:31	10:51	11:31	11:51	12:32	12:51
Wyong	09:03	09:35	09:54	10:34	10:54	11:34	11:54	12:35	12:54
Warnervale	—	09:39	—	10:38	—	11:38	—	12:39	—
Wyee	—	09:46	—	10:45	—	11:45	—	12:45	—
Morisset	09:17	09:52	10:09	10:51	11:09	11:51	12:09	12:52	13:09
Dora Creek	—	09:56	—	10:55	—	11:55	—	12:56	—
Awaba	—	10:05	—	11:04	—	12:04	—	13:05	—
Fassifern	09:33	10:10	10:24	11:09	11:24	12:09	12:24	13:10	13:24
Booragul	—	10:14	—	11:13	—	12:13	—	13:14	—
Teralba	—	10:16	—	11:15	—	12:15	—	13:16	—
Cockle Creek	—	10:19	—	11:18	—	12:18	—	13:19	—
Cardiff	09:44	10:24	10:35	11:23	11:35	12:23	12:35	13:24	13:35
Kotara	—	10:29	—	11:28	—	12:28	—	13:28	—
Adamstown	—	10:31	—	11:30	—	12:30	—	13:31	—
Broadmeadow	09:52	10:34	10:43	11:33	11:43	12:33	12:43	13:34	13:43
Hamilton	09:55	10:38	10:46	11:37	11:46	12:37	12:46	13:37	13:46
Newcastle Interchange	09:59	10:42	10:51	11:41	11:51	12:41	12:51	13:41	13:51



## Central to Lithgow and Bathurst

[illegible]

Sydney (Central) – Dubbo – Lightning Ridge –  
Coolabah – Brewarrina – Bourke – Broken Hill

	<div>T</div>	<div>T</div>	<div>C</div>	<div>C</div>
Destination	Broken Hill	Dubbo	Broken Hill	Bourke
Days of Operation	Mon	Daily	Daily	Tue/Thu/Fri/Sun
Service No.	445	427	589	511
<b>Sydney (Central)</b>	06:18	07:19		
Strathfield	u06:30	u07:30		
Parramatta	u06:42	u07:42		
Blacktown	...	u07:52		
Penrith	u07:05	u08:06		
Katoomba	u07:59	u09:00		
Lithgow	u08:39	09:40		
Rydal	...	a10:01		
Tarana	...	a10:18		
Bathurst	09:47	10:52		
Blayney	10:35	11:38		
Millthorpe	...	a11:48		
Orange	10:59	12:02		
Parkes	12:48	...		
Condobolin	14:00	...		
Stuart Town	...	12:42		
Wellington	...	13:06		
Geurie	...	13:23		
<b>Dubbo</b>	ARV	13:45		
<b>Connection</b>				
<b>Dubbo</b>	DEP	...	14:15	14:16
Eumungerie	...	...	...	14:20
Gilgandra	...	...	...	a14:48
Gulargambone	...	...	...	15:10
Coonamble	ARV	...	...	15:45
Coonamble	DEP	...	...	16:15
Walgett	...	...	...	16:45
<b>Lightning Ridge</b>	...	...	...	18:00
Narromine	...	14:48	14:51	18:50
Trangie	...	15:12	15:16	...
Nevertire	...	15:36	15:38	17:20
Nyngan	...	16:15	16:13	17:45
Girilambone	...	...	16:44	18:07
<b>Coolabah</b>	ARV	...	17:09	18:42
<b>Connection</b>				19:13
<b>Coolabah</b>	DEP	...	...	19:38
Gongolgon	...	...	...	...
<b>Brewarrina</b>	...	...	...	19:43
Byrock	...	...	17:54	...
<b>Bourke</b>	...	...	18:46	20:49
Euabalong West	14:45	...	...	21:19
Ivanhoe	16:31	...	...	...
Darnick	a17:16	...	...	...
Hermidale	...	16:45	...	...
Boppy Mountain	...	17:15	...	...
Cobar	ARV	...	17:45	...
Cobar	DEP	...	18:15	...
Emmdale	...	...	20:05	...

<div>C</div>	<div>C</div>	<div>C</div>	<div>C</div>
Brewarrina	Lightning Ridge	Bourke	Brewarrina
Tue/Thu/Fri/Sun	Daily	Wed	Wed
517	513	523	525

**Sydney (Central) – Tamworth – Walcha Road –  
Walcha – Armidale – Tenterfield – Inverell**

	T	C	C	C	
Destination	Armidale	Inverell	Inverell	Tenterfield	Walcha
Days of Operation	Daily	Daily exp Tue	Tue	Daily	Daily
Service No.	223	311	337	327	813
<b>Sydney (Central)</b>	9:30				
Strathfield	u09:42				
Hornsby	u10:03				
Gosford	u10:44				
Wyong	u10:59				
Fassifern	u11:27				
Broadmeadow	11:45				
Maitland	12:10				
Singleton	12:40				
Muswellbrook	13:16				
Aberdeen	a13:27				
Scone	13:37				
Murrurundi	a14:03				
Willow Tree	a14:25				
Quirindi	14:37				
Werris Creek	14:57				
<b>Tamworth</b> ARV	15:37				
<b>Connection</b>					
<b>Tamworth</b> DEP		15:55			
Kootingal	15:58	...			
<b>Walcha Road</b> ARV	16:46	...			
<b>Connection</b>					
<b>Walcha Road</b> DEP				16:55	
<b>Walcha</b>				17:15	
Uralla	17:12	...			
<b>Armidale</b> ARV	17:35				
<b>Connection</b>					
<b>Armidale</b> DEP		...	17:50	17:50	
Yarrowyck	...	...	18:16	...	
Bundarra	...	...	18:48	...	
Tingha	...	...	19:15	...	
Gilgai	...	...	19:27	...	
Guyra	...	...	...	18:26	
Llangothlin	...	...	...	18:35	
Glencoe	...	...	...	18:56	
Glen Innes	...	...	...	19:18	
Dundee	...	...	...	19:34	
Deepwater	...	...	...	19:46	
Bolivia	...	...	...	20:01	
<b>Tenterfield</b>	...	...	...	20:21	
Attunga	16:12	...			
Manilla	16:32	...			
Upper Manilla	16:45	...			
Barraba	17:08	...			
Cobbadah	17:20	...			
Bingara	17:53	...			
Warialda Rail	18:19	...			
Warialda	18:27	...			
Delungra	18:49	...			
<b>Inverell</b>	19:15	19:37			

**Inverell – Tenterfield – Armidale – Walcha –  
Walcha Road – Tamworth – Sydney (Central)**

	C		C	C	T	T
Destination	Armidale	Walcha Rd	Tamworth	Armidale	Sydney	Sydney
Days of Operation	Daily	Daily	Daily except Tue	Tue	Mon-Fri	Sat & Sun
Service No.	328	814	312	338	224	224
<b>Inverell</b>			06:30	06:20		
Delungra			06:53	...		
Warialda			07:20	...		
Warialda Rail			07:28	...		
Bingara			07:58	...		
Cobbadah			08:28	...		
Barraba			08:48	...		
Upper Manilla			09:11	...		
Manilla			09:26	...		
Attunga			09:46	...		
<b>Tenterfield</b>	05:40	...	...	...		
Bolivia	06:00	...	...	...		
Deepwater	06:20	...	...	...		
Dundee	06:30	...	...	...		
Glen Innes	07:00	...	...	...		
Glencoe	07:15	...	...	...		
Llangothlin	07:35	...	...	...		
Guyra	07:51	...	...	...		
Gilgai	...	...	...	06:35		
Tingha	...	...	...	06:50		
Bundarra	...	...	...	07:20		
Yarrowyck	...	...	...	07:53		
<b>Armidale</b> ARV	08:20	...	...	08:19		
<b>Connection</b>						
<b>Armidale</b> DEP		...	...	8:40	8:40	
Uralla	...	...	...	8:56	8:56	
<b>Walcha</b>	08:45	...	...	...	...	
<b>Walcha Road</b> ARV	09:10	...	...	...	...	
<b>Connection</b>						
<b>Walcha Road</b> DEP	...	...	...	9:22	9:22	
Kootingal	...	...	...	10:09	10:09	
<b>Tamworth</b> ARV	10:06	...	...	...	...	
<b>Connection</b>						
<b>Tamworth</b> DEP		...	...	10:27	10:27	
Werris Creek		...	...	11:07	11:07	
Quirindi		...	...	11:31	11:31	
Willow Tree		...	...	a11:41	a11:41	
Murrurundi		...	...	a12:04	a12:04	
Scone		...	...	12:28	12:28	
Aberdeen		...	...	a12:37	a12:37	
Muswellbrook		...	...	12:48	12:48	
Singleton		...	...	13:24	13:24	
Maitland		...	...	13:55	13:55	
Broadmeadow		...	...	14:18	14:18	
Fassifern		...	...	d14:36	d14:36	
Wyong		...	...	d15:04	d15:04	
Gosford		...	...	d15:20	d15:20	
Hornsby		...	...	d16:03	d16:03	
Strathfield		...	...	d16:24	d16:24	
<b>Sydney (Central)</b>		...	...	16:39	16:38	



	C	T	C	C	C
Destination	Tweed Heads	Casino	Brisbane	Robina	Surfers Paradise
Days of Operation	Daily	Daily	Daily*	Daily*	Daily*
Service No.	165	033	175	171	173

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\* During NSW Daylight Savings, services will arrive and depart QLD locations 1 hour earlier than shown.

## North Shore to Hornsby via City

Monday to Friday																			
Gordon	-	07:09	-	07:24	-	07:39	-	07:54	-	08:09	-	08:24	-	08:39	-	08:54	-	09:09	09:24
Killara	-	07:11	-	07:26	-	07:41	-	07:56	-	08:11	-	08:26	-	08:41	-	08:56	-	09:11	09:26
Indifield	-	07:13	-	07:28	-	07:43	-	07:58	-	08:13	-	08:28	-	08:43	-	08:58	-	09:13	09:28
Roseville	-	07:15	-	07:30	-	07:45	-	08:00	-	08:15	-	08:30	-	08:45	-	08:51	-	09:06	09:30
Chatswood	-	07:19	-	07:34	-	07:49	-	08:04	-	08:19	-	08:34	-	08:49	-	08:55	-	09:04	09:19
Artarmon	-	07:21	-	07:36	-	07:51	-	08:06	-	08:21	-	08:36	-	08:51	-	08:57	-	09:06	09:21
St Leonards	-	07:24	-	07:39	-	07:54	-	08:09	-	08:24	-	08:39	-	08:54	-	09:00	-	09:09	09:24
Wollstonecraft	-	07:26	-	07:41	-	07:56	-	08:11	-	08:26	-	08:41	-	08:56	-	09:02	-	09:11	09:26
Waverton	-	07:28	-	07:43	-	07:58	-	08:13	-	08:28	-	08:43	-	08:58	-	09:04	-	09:13	09:28
North Sydney	-	07:32	-	07:47	-	08:02	-	08:17	-	08:32	-	08:47	-	09:02	-	09:08	-	09:17	09:32
Milsons Point	-	07:34	-	07:49	-	08:04	-	08:19	-	08:34	-	08:49	-	09:10	-	09:19	-	09:24	09:49
Wynyard	-	07:38	-	07:53	-	08:08	-	08:23	-	08:38	-	08:53	-	09:08	-	09:14	-	09:23	09:38
Town Hall	-	07:42	-	08:03	-	08:12	-	08:27	-	08:42	-	08:57	-	09:12	-	09:18	-	09:27	09:42
Central	10:45	07:46	10:50	08:01	08:05	10:15	08:16	10:20	08:31	10:35	10:45	08:50	09:01	09:15	09:16	09:22	10:31	10:45	10:51
Redfern	-	07:48	-	08:07	-	08:18	-	08:31	-	08:46	-	08:59	-	09:14	-	09:24	-	09:34	09:49
Burwood	-	07:57	-	08:03	-	08:12	-	08:28	-	08:27	-	08:33	-	08:42	-	08:48	-	08:57	09:03
Sutherland	7:58	08:00	08:07	08:15	08:22	08:28	08:30	08:37	08:45	08:52	08:58	08:50	09:07	09:15	09:28	09:30	09:36	09:45	09:58
North Sutherland	-	08:03	-	08:18	-	08:33	-	08:48	-	08:53	-	09:03	-	09:18	-	09:23	-	09:33	10:03
Concord West	-	08:05	-	08:20	-	08:35	-	08:50	-	09:05	-	09:20	-	09:35	-	09:50	-	10:05	10:20
Rhodes	-	08:08	-	08:12	-	08:23	-	08:27	-	08:38	-	08:42	-	08:53	-	08:57	-	09:08	10:23
Meadowbank	-	08:10	-	08:25	-	08:40	-	08:55	-	09:10	-	09:25	-	09:40	-	09:55	-	10:10	10:25
West Ryde	-	08:12	-	08:16	-	08:27	-	08:46	-	08:59	-	09:01	-	09:12	-	09:16	-	09:27	10:27
Denistone	-	08:14	-	08:29	-	08:31	-	08:44	-	08:55	-	09:14	-	09:29	-	09:44	-	09:59	10:14
Eastwood	-	08:16	-	08:19	-	08:31	-	08:34	-	08:46	-	08:49	-	09:01	-	09:04	-	09:16	10:21
Epping	08:10	08:20	08:22	08:35	08:37	08:40	08:50	08:52	09:05	09:07	09:10	09:20	09:22	09:35	09:40	09:50	10:05	10:10	10:20
Cheltenham	-	08:23	-	08															

## Hornsby to North Shore via City

Monday to Friday																						
Hornsby	07:05	07:08	-	07:20	07:23	-	07:35	07:38	-	07:50	07:53	-	08:05	08:08	08:20	-	08:24	08:35	-	08:39	08:45	
Normanhurst	-	07:11	-	-	07:26	-	-	07:41	-	-	07:56	-	-	08:11	-	08:27	-	-	-	08:42	08:47	
Thornleigh	-	07:14	-	-	07:29	-	-	07:44	-	-	07:59	-	-	08:14	-	-	08:30	-	-	08:45	08:50	
Pennant Hills	-	07:16	-	-	07:31	-	-	07:46	-	-	08:01	-	-	08:16	-	-	08:32	-	-	08:47	08:52	
Beecroft	-	07:19	-	-	07:34	-	-	07:49	-	-	08:04	-	-	08:19	-	-	08:35	-	-	08:50	08:55	
Cheltenham	-	07:21	-	-	07:36	-	-	07:51	-	07:59	08:06	-	-	08:21	-	-	08:37	-	-	08:52	08:57	
Epping	07:16	07:25	07:29	07:31	07:40	07:44	07:46	07:55	07:59	08:01	08:10	08:14	08:16	08:25	08:31	08:32	08:41	08:46	08:47	08:56	09:01	
Eastwood	-	07:27	07:32	-	07:42	07:47	-	07:57	08:02	-	08:12	08:17	-	08:27	-	08:35	08:43	-	-	08:50	08:58	09:05
Denstone	-	-	07:35	-	-	07:50	-	-	08:05	-	-	08:20	-	-	08:38	-	-	-	-	08:53	09:08	
-	-	-	07:37	-	-	07:52	-	-	08:07	-	08:22	08:27	-	08:30	-	08:40	08:46	-	-	08:55	09:01	-
Meadowbank	-	07:30	07:39	-	07:47	07:54	-	08:00	08:09	-	08:17	08:24	-	08:32	-	08:42	08:48	-	-	08:57	09:03	09:12
Rhodes	-	07:35	07:41	-	07:50	07:56	-	08:05	08:11	-	08:20	08:26	-	08:35	-	08:44	08:51	-	-	08:59	09:06	09:14
Concord West	-	-	07:44	-	-	07:59	-	-	08:14	-	-	08:29	-	-	-	08:47	-	-	-	09:02	-	09:17
North Strathfield	-	-	07:46	-	-	08:01	-	-	08:16	-	-	08:31	-	-	-	08:49	-	-	-	09:04	-	09:19
Strathfield	107:28	07:40	07:51	107:43	07:55	08:06	107:58	08:10	08:21	108:13	08:25	08:36	108:28	08:43	08:54	08:59	108:58	09:04	09:09	09:11	09:14	09:26
Burwood	-	07:43	-	-	07:58	-	-	08:13	-	-	-	-	-	08:43	-	08:56	-	-	-	09:14	-	09:24
Redfern	-	-	08:03	-	-	08:18	108:10	-	08:33	-	-	08:48	108:39	-	09:06	-	-	-	-	09:21	-	09:36
Central	107:42	107:54	08:06	107:57	108:09	08:21	108:13	108:25	08:36	108:27	108:40	08:51	108:43	108:55	108:57	09:09	109:11	109:12	09:21	109:25	09:39	-
Town Hall	-	-	08:09	-	-	08:24	-	-	08:39	-	-	08:54	-	-	09:12	-	-	-	-	09:27	-	09:42
Wynyard	-	-	08:12	-	-	08:27	-	-	08:42	-	-	08:57	-	-	09:15	-	-	-	-	09:30	-	09:45
Milsons Point	-	-	08:16	-	-	08:31	-	-	08:46	-	-	09:01	-	-	09:19	-	-	-	-	09:34	-	09:49
North Sydney	-	-	08:19	-	-	08:34	-	-	08:49	-	-	09:04	-	-	09:22	-	-	-	-	09:37	-	09:52
Waverton	-	-	08:21	-	-	08:36	-	-	08:51	-	-	09:06	-	-	09:24	-	-	-	-	09:39	-	09:54
Woolstonecraft	-	-	08:23	-	-	08:38	-	-	08:53	-	-											

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City to Parramatta or Leppington



Monday to Friday		A		B		C		D		E		F		G		H		I		J		K		L		M		N		O		P		Q		R		S		T		U		V		W		X		Y		Z																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
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Parramatta or Leppington to City



Monday to Friday		A		B		C		D		E		F		G		H		I		J		K		L		M		N		O		P		Q		R		S		T		U		V		W		X		Y		Z																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
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## Berowra to City via Gordon

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Valid from: 19 Aug 2024

Creation date: 20 Aug 2024

NOTE: Information is correct on date of download.

Monday to Friday		S	A	S	A	S	S	A	S	S	A	S	S	A	S	S	A	S	S	A	S											
Service Information		SFD										SFD										SFD										
Berowra		03:41	-	-	-	-	-	-	-	-	-	04:38	-	-	-	-	-	-	-	-	-	05:39	-	-	-	-	-	-	-	-	-	
Mount Kuring-gai		-	-	-	-	-	-	-	-	-	-	04:42	-	-	-	-	-	-	-	-	-	05:43	-	-	-	-	-	-	-	-	-	
Mount Colah		-	-	-	-	-	-	-	-	-	-	04:45	-	-	-	-	-	-	-	-	-	05:46	-	-	-	-	-	-	-	-	-	
Asquith		03:49	-	-	-	-	-	-	-	-	-	04:48	-	-	-	-	-	-	-	-	-	05:49	-	-	-	-	-	-	-	-	-	
Hornsby	ARR	03:52	-	-	-	-	-	-	-	-	-	04:51	-	-	-	-	-	-	-	-	-	05:52	-	-	-	-	-	-	-	-	-	
Hornsby	DEP	03:53	04:04	-	04:19	-	04:34	04:52	-	04:49	-	05:04	-	-	05:19	-	05:34	05:53	-	-	-	05:53	-	-	-	-	-	-	-	-	-	
Waitara		-	04:06	-	04:21	-	04:36	-	-	04:51	-	05:06	-	-	05:21	-	05:36	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Wahroonga		-	04:08	-	04:23	-	04:38	-	-	04:53	-	05:08	-	-	05:23	-	05:38	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Warrawee		-	04:10	-	04:25	-	04:40	-	-	04:55	-	05:10	-	-	05:25	-	05:40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Turramurra		-	04:12	-	04:27	-	04:42	-	-	04:57	-	05:12	-	-	05:27	-	05:42	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Pymble		-	04:15	-	04:30	-	04:45	-	-	05:00	-	05:15	-	-	05:30	-	05:45	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Gordon		-	04:18	-	04:33	-	04:48	-	-	05:03	05:09	05:18	05:24	-	-	05:33	05:39	05:48	-	-	-	05:54	-	-	-	-	-	-	-	-	-	
Killara		-	04:20	-	04:35	-	04:50	-	-	05:05	05:11	05:20	05:26	-	-	05:35	05:41	05:50	-	-	-	05:56	-	-	-	-	-	-	-	-	-	
Lindfield		-	04:22	-	04:37	-	04:52	-	-	05:07	05:13	05:22	05:28	05:31	05:37	05:43	05:52	-	-	-	05:58	06:01	06:07	06:13	-	-	-	-	-	-	-	
Roseville		-	04:24	-	04:39	-	04:54	-	-	05:09	05:15	05:24	05:30	05:33	05:39	05:45	05:54	-	-	-	06:00	06:03	06:09	06:15	-	-	-	-	-	-	-	
Chatswood		-	04:28	-	04:43	-	04:58	-	-	05:13	05:19	05:28	05:34	05:37	05:43	05:49	05:58	-	-	-	06:04	06:07	06:13	06:19	-	-	-	-	-	-	-	
Artarmon		-	04:30	-	04:45	-	05:00	-	-	05:15	05:21	05:30	05:36	05:39	05:45	05:51	06:00	-	-	-	06:06	06:09	06:15	06:21	-	-	-	-	-	-	-	
St Leonards		-	04:33	-	04:48	-	05:03	-	-	05:18	05:24	05:33	05:39	05:42	05:48	05:54	06:03	-	-	-	06:09	06:12	06:18	06:24	-	-	-	-	-	-	-	
Wollstonecraft		-	04:35	-	04:50	-	05:05	-	-	05:20	05:26	05:35	05:41	05:44	05:50	05:56	06:05	-	-	-	06:11	06:14	06:20	06:26	-	-	-	-	-	-	-	
Waverton		-	04:37	-	04:52	-	05:07	-	-	05:22	05:28	05:37	05:43	05:46	05:52	05:58	06:07	-	-	-	06:13	06:16	06:22	06:28	-	-	-	-	-	-	-	
North Sydney		-	04:41	04:46	04:56	05:01	05:11	-	05:16	05:26	05:32	05:41	05:47	05:50	05:56	06:02	06:11	-	-	-	06:17	06:20	06:26	06:32	-	-	-	-	-	-	-	
Milsons Point		-	04:43	04:49	04:58	05:04	05:13	-	05:19	05:28	05:34	05:43	05:49	05:52	05:58	06:04	06:13	-	-	-	06:19	06:22	06:28	06:34	-	-	-	-	-	-	-	
Wynyard		-	04:47	04:53	05:02	05:08	05:17	-	05:23	05:32	05:38	05:47	05:53	05:56	06:02	06:08	06:17	-	-	-	06:23	06:26	06:32	06:38	-	-	-	-	-	-	-	
Town Hall		-	04:51	04:57	05:06	05:12	05:21	-	05:27	05:36	05:42	05:51	05:57	06:00	06:06	06:12	06:21	-	-	-	06:27	06:30	06:36	06:42	-	-	-	-	-	-	-	
Central	104:30	04:55	05:01	05:10	05:16	05:25	05:28	05:31	05:40	05:46	05:55	06:01	06:04	06:10	06:16	06:25	06:28	06:31	06:34	06:40	06:46	-	-	-	-	-	-	-	-	-	-	
Redfern		-	04:57	05:03	05:12	05:18	05:27	-	05:33	05:42	05:48	05:57	06:03	06:06	06:12	06:18	06:27	-	-	-	06:33	06:36	06:42	06:48	-	-	-	-	-	-	-	
Burwood		-	-	05:12	05:27	-	05:42	-	05:42	05:57	-	06:12	-	06:12	-	06:27	-	06:42	-	-	-	06:48	-	-	-	-	-	-	-	-	-	
Strathfield		-	05:09	05:15	05:24	05:30	05:39	-	05:45	05:54	06:00	06:09	06:15	06:18	06:24	06:30	06:39	-	-	-	06:45	06:48	06:54	07:00	-	-	-	-	-	-	-	
Lidcombe		-	05:15	-	05:30	-	05:45	-	-	06:00	-	06:15	-	-	-	06:30	-	06:45	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Auburn		-	05:18	-	05:32	-	05:48	-	-	06:02	-	06:18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Clyde		-	05:21	-	05:35	-	05:51	-	-	06:05	-	06:21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Granville		-	05:22	-	05:37	-	05:52	-	-	06:07	-	06:22	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Harris Park		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Parramatta		-	05:26	-	05:41	-	05:56	-	-	06:11	-	06:26	-	-	06:30	06:37	-	06:52	-	-	-	07:00	07:07	-	-	-	-	-	-	-	-	-

T1

## City to Berowra via Gordon

T

Monday to Friday		S	A	S	A	S	S	A	S	S	A	S	S	A	S	S	A	S	S	A	S	S	A
Parramatta		07:37	-	07:43	07:46	07:49	07:52	-	07:58	08:01	08:04	08:07	-	08:13	08:16	08:19	08:22	-	08:28	08:31	08:34	08:38	
Harris Park		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Granville		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Clyde		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Auburn		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Lidcombe		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Strathfield		07:49	07:51	07:55	07:58	08:01	08:04	08:06	08:10	08:13	08:16	08:19	08:21	08:25	08:28	08:31	08:34	08:36	08:40	08:43	08:46	08:44	
Burwood		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	08:51	
Redfern	08:00	08:03	08:06	08:09	08:12	08:15	08:18	08:21	08:24	08:27	08:30	08:33	08:36	08:39	08:42	08:45	08:48	08:51	08:54	08:57	09:00	09:02	
Central	08:03	08:06	08:09	08:12	08:15	08:18	08:21	08:24	08:27	08:30	08:33	08:36	08:39	08:42	08:45	08:48	08:51	08:54	08:57	09:00	09:03	09:05	
Town Hall	08:06	08:09	08:12	08:15	08:18	08:21	08:24	08:27	08:30	08:33	08:36	08:39	08:42	08:45	08:48	08:51	08:54	08:57	09:00	09:03	09:08		
Wynyard	08:09	08:12	08:15	08:18	08:21	08:24	08:27	08:30	08:33	08:36	08:39	08:42	08:45	08:48	08:51	08:54	08:57	09:00	09:03	09:06	09:11		
Milsons Point	08:13	08:16	08:19	08:22	08:25	08:28	08:31	08:34	08:37	08:40	08:43	08:46	08:49	08:52	08:55	08:58	09:01	09:04	09:07	09:10	09:15		
North Sydney	08:16	08:19	08:22	08:25	08:28	08:31	08:34	08:37	08:40	08:43	08:46	08:49	08:52	08:55	08:58	09:01	09:04	09:07	09:10	09:12	09:18		
Waverton	08:18	08:21	08:24	08:27	08:30	08:33	08:36	08:39	08:42	08:45	08:48	08:51	08:54	08:57	09:00	09:03	09:06	09:09	09:12	-	09:20		
Wollstonecraft	08:20	08:23	08:26	08:29	08:32	08:35	08:38	08:41	08:44	08:47	08:50	08:53	08:56	08:59	09:02	09:05	09:08	09:11	09:14	-	09:22		
St Leonards	08:23	08:26	08:29	08:32	08:35	08:38	08:41	08:44	08:47	08:50	08:53	08:56	08:59	09:02	09:05	09:08	09:11	09:14	09:17	-	09:25		
Artarmon	08:26	08:29	08:32	08:35	08:38	08:41	08:44	08:47	08:50	08:53	08:56	08:59	09:02	09:05	09:08	09:11	09:14	09:17	09:20	-	09:28		
Chatswood	08:29	08:32	08:35	08:38	08:41	08:44	08:47	08:50	08:53	08:56	08:59	09:02	09:05	09:08	09:11	09:14	09:17	09:20	09:23	-	09:31		
Roseville	08:32	08:35	08:38	08:41	08:44	08:47	08:50	08:53	08:56	08:59	09:02	09:05	09:08	09:11	09:14	09:17	09:20	09:23	09:26	-	09:34		
Lindfield	08:34	08:37	08:40	08:43	08:46	08:49	08:52	08:55	08:58	09:01	09:04	09:07	09:10										
Killara	-	08:39	08:42	08:45	08:48	08:51	08:54	-	09:03	09:03	09:04	09:07	09:10										
-	-	08:42	08:45	08:48	08:50	08:53	08:57	-	09:03	09:05	09:08	09:12	-										
Pyrmble	-	-	08:50	-	-	-	-	-	09:05	-	-	-	09:20										
Turrumbidgee	-	08:46	08:53	-	-	-	09:01	-	09:08	-	-	09:16	09:23										
Warrawee	-	-	08:55	-	-	-	-	-	09:10	-	-	-	09:25	-	09:31	-	09:38						
Wahroonga	-	-	08:57	-	-	-	-	-	09:12	-	-	-	09:27	-	-	-	09:40						
Waitara	-	-	08:51	-	08:59	-	-	09:06	09:14	-	-	09:21	09:29	-	09:36	-	09:44						
Hornsby	ARR	-	08:54	08:58	-	-	09:09	-	09:18	-	09:24	-	09:32	-	09:38	-	09:48						
Hornsby	DEP	-	-	-	09:03	-	-	-	-	-	-	-	09:33	-	-	-	-						
Asquith	-	-	-	-	09:06	-	-	-	-	-	-	-	09:36	-	-	-	-						
Mount Colah	-	-	-	-	09:09	-	-	-	-	-	-	-	09:39	-	-	-	-						
Mount Kuring-gai	-	-	-	-	09:12	-	-	-	-	-	-	-	09:42	-	-	-	-						
Berowra	-	-	-	-	09:16	-	-	-	-	-	-	-	09:46	-	-	-	-						

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Friday, 23 August 2024 2:19:09 PM

---

Submitted on Fri, 23/08/2024 - 14:18

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Rita

### **Last name**

Ng

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Homebush

### **Please provide your view on the project**

I object to it

### **Submission**

I am the owner of [REDACTED]. I note that the rezoning has only drafted the height to be 6 storeys whereas across the road in Ismay Ave and Underwood Road, it's rezoned as 12-20 storeys. To be able to accommodate more people into the area, my property should also be zoned 12-20 storeys. Even though there's a silo across from my property, developers should be able to accommodate that .

Secondly, my neighbour , [REDACTED] Homebush should be de-listed as heritage property, it is falling into pieces, vacant, rat and pests invested. Floor boards, wall panels, roof all rotten and damaged. It does not have any unique feature of any heritage properties. Only open to hoodlums to go in. The owners are in their 80s, non-English speaking and no finance to do any repair.

Please imagine such ugly, torn down house in the midst of a newly developed Homebush!! If de-listed, both 1 & 3 Short Street can be built on higher levels to accommodate more people to live in the area. Thank you.

Please provide transparency or reply to me thank you. My email address is

[REDACTED]

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Friday, 23 August 2024 3:35:22 PM

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Submitted on Fri, 23/08/2024 - 15:35

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

HOMEBUSH, 2140, NSW

**Please provide your view on the project**

I object to it

### **Submission**

Where will the young families go that worked hard and saved to secure property in this area? We don't want the instant city, we want somewhere where our children will have a backyard, know their neighbours, have space and not live in the shadows of high rise apartments buildings.

Due to exponential property prices in Sydney, we will have nowhere to go, we will not be fairly compensated for our forever homes because of this atrocious proposal.

The roads in this area is already a disaster, how is it wise to add thousands more residents to an area that is already congested.

Please go and destroy an area out west instead.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Friday, 23 August 2024 4:21:31 PM  
**Attachments:** [pia-submission-tod-accelerated-precincts-final.pdf](#)

---

Submitted on Fri, 23/08/2024 - 16:20

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Landon

### **Last name**

Brown

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Surry Hills 2010

### **Please provide your view on the project**

I am just providing comments

### **Submission file**

[pia-submission-tod-accelerated-precincts-final.pdf](#) (718.17 KB)

### **Submission**

Please find the Planning Institute of Australia (PIA) submission on the TOD accelerated precincts attached.

### **I agree to the above statement**

Yes



Ms Kiersten Fishburn  
Secretary  
Department of Planning, Housing and Infrastructure

Dear Ms Fishburn,

## PIA Submission – TOD Accelerated Precincts

PIA is pleased to provide our submission on the draft rezoning proposals for the announced Transport Oriented Development (TOD) Accelerated Precincts ([link](#)). This submission addresses common concerns with all draft rezoning proposals rather than providing site-specific feedback.

Our separate submission on proposed pathway changes to support TOD can be read [here](#).

### Overview

PIA supports the intensification of more diverse housing around centres that are highly accessible to public transport and offer good amenity. The potential TODs should be selected based spatial strategic planning priorities set out in a city plan. The housing targets, affordable housing goals, urban design opportunities and infrastructure needs should be resolved in precinct master plans. This would reduce risks in the development assessment phase and warrant consideration of streamlined approval pathways.

PIA commends the Government for its commitment to including affordable housing contributions in the TOD Program. The widespread adoption of affordable housing contributions in tandem with State-led rezonings is a welcome improvement on the previous piecemeal approach.

However, there are still significant improvements which could be made to embed consistency and streamline proposed arrangements for affordable housing. These relate primarily to the need for a consistent method for calculating contribution rates and clear guidance on how contributions should be managed and spent.

PIA's recommendations are as follows:

1. Publish a consistent methodology for determining contribution rates based on the level of uplift beyond existing controls (aka change in density). This would provide a level playing field for development that is clear to both proponents and assessment teams.
2. Provide an endorsed Affordable Housing Contribution Scheme (AHCS) template with common principles for determining and administering affordable housing contributions, building on the work already available through the [Resilient Sydney AHCS Project](#).
3. Provide a schedule for progressively increasing affordable housing contribution rates over time up to 15% to the extent of feasibility. This would ensure there is no doubt about what the fixed contribution is at any given time.

4. Provide further information on how contributions could be most efficiently managed, allocated and also supplemented to maximise the total yield of affordable housing.
5. Measure any 'net loss' of existing low-cost housing in TOD precincts and consider options to avoid displacement.

## PIA engagement with the TOD Program

PIA have been closely engaged with the TOD Program throughout its development. In September 2023, we issued a [joint statement](#) with Shelter NSW in support of a "Station Precinct SEPP and enabling reforms", calling for an integrated package which:

*"Streamlines development assessment where there is capacity near stations for growth or a commitment to build capacity by creating opportunities for inclusive renewal."*

Since the announcement of the TOD Program, PIA have written submissions on the TOD SEPP and to the Inquiry into the Development of the TOD Program ([link](#)). These submissions have supported the intent of the TOD Program on the basis that it should be just one part of a broader city strategy.

Consistent themes of our advocacy have been:

- The need for integrated strategic planning,
- Better coordination between planning instruments, and
- Up-front arrangements for delivering affordable housing.

## Review of proposed arrangements for affordable housing

Please note that PIA has not commented on the site-specific arrangements for housing delivery in individual TOD precincts.

Draft rezoning proposals are currently on exhibition for seven of eight accelerated precincts under the TOD Program. The proposals include ranges for affordable housing contributions in each of the precincts, with potential for between 2,835 and 6,190 affordable homes in perpetuity, depending on where contribution rates are selected from within the ranges available.

Precinct	Zoned capacity for additional housing	Affordable housing contribution range	Number of affordable homes
Hornsby	5000	5-10%	250-500
Macquarie Park	4622	10-15%	460-690
Kellyville & Bella Vista	20700	3-8%	620-1650
Bankstown	12500	3-10%	355-1250
Crows Nest	3255	10-15%	325-488
Homebush	16100	5-10%	805-1610
Bayside West	N/A	N/A	N/A

This has the potential to yield a significant amount of affordable housing across Sydney – but there are major risks that AHCSs will underperform due to:

- A lack of coherent parameters for determining contribution rates, and
- Detail on how contributions should be managed and spent.

By introducing ranges for affordable housing contributions without clear guidance for what rate to apply, a level of uncertainty is embedded which prevents applicants and assessment teams from establishing clear expectations prior to assessment. Setting these expectations as early and clearly as possible is crucial so that affordable housing contributions can be factored into land values without adding to development costs. Without a clear methodology for selecting a contribution rate, this may become an arbitrary and costly process, undermining both development feasibility and affordable housing outcomes.

The draft rezoning proposal also fails to account for the likely 'net loss' of low-cost housing which occurs as older housing stock is gradually replaced through the process of urban renewal. This has potential to displace low-moderate income rentals more than can be replaced via the AHCS. Net loss of affordable housing should be measured.

Ultimately, the ambiguity around contribution rates and implementation is likely to mean that only the minimum rates can be realised. This would be a missed opportunity to deliver affordable housing at a meaningful scale across Sydney, closer to the 15% anticipated following the release of the TOD Program in [December 2023](#).

## PIA recommendations

The accelerated TOD precincts are a major opportunity to deliver affordable housing at scale in well-located areas across Sydney. With refinements to the proposed arrangements addressing the risks outlined above, an outcome can be secured much closer to what was [originally signalled](#) at the outset of the TOD Program.

Most importantly, this will require changes to embed consistency in the approach to calculating and administering contributions. Refinements should ensure that the final approach is simple, workable and consistent for both applicants and assessment teams at the coalface of the TOD Program.

PIA's recommendations are as follows:

1. Publish a consistent methodology for determining contribution rates based on the level of uplift beyond existing controls aka change in density. This would provide a level playing field for development that is clear to both proponents and assessment teams.
2. Provide an endorsed AHCS template with common principles for determining and administering affordable housing contributions, building on the work already available through the [Resilient Sydney AHCS Project](#).
3. Provide a schedule for progressively increasing affordable housing contribution rates over time up to 15% to the extent of feasibility. This would ensure there is no doubt about what the fixed contribution is at any given time.
4. Provide further information on how contributions could be most efficiently managed, allocated and also supplemented to maximise the total yield of affordable housing.
5. Measure any 'net loss' of existing low-cost housing in TOD precincts and consider options to avoid displacement.

Please contact PIA NSW at [nsw@planning.org.au](mailto:nsw@planning.org.au) for further information on this submission.

Yours sincerely,

[Redacted Signature]



letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[Redacted Signature]

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Friday, 23 August 2024 10:24:36 PM

---

Submitted on Fri, 23/08/2024 - 22:24

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

■

**Last name**

■

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

■

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I object to it

### **Submission**

The proposed area for development is too large, we definitely do not have the infrastructure to support the amount of people this development will bring to an already congested area, there is literally one main Rd in North Strathfield, Pomeroy Rd which contexts to underwood Rd.

The area needs better urban planning, heritage design, with less high rise, maximum high of units should not exceed 6 levels. The last thing we need is another design disaster like Rhodes, with atrocious towers, which look hideous like that Rollercoaster building which is an eye saw from a mile away.

Thank you

**I agree to the above statement**



Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 9:18:45 AM

---

Submitted on Sat, 24/08/2024 - 09:18

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush West

**Please provide your view on the project**

I object to it

**Submission**

Totally against this.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 10:03:45 AM  
**Attachments:** [submission-to-nsw-planning-\(1.pdf\)](#)

---

Submitted on Sat, 24/08/2024 - 10:01

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

SOUTH WENTWORTHVILLE

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning-\(1.pdf\)](#) (1.28 MB)

**Submission**

I agree to the draft plans and want to resume.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED] 2140

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

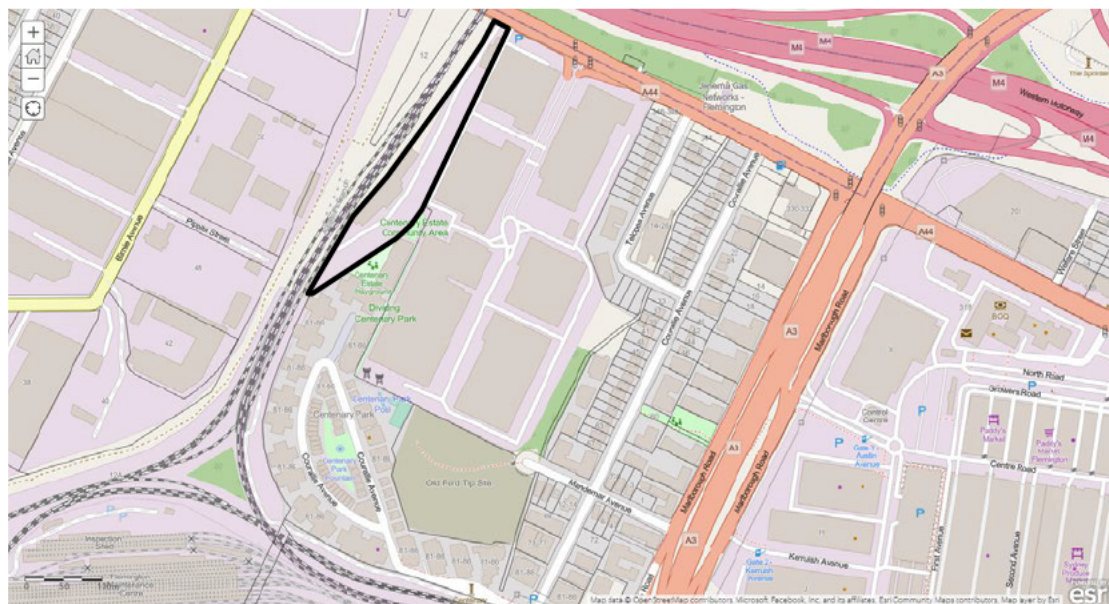


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary



- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

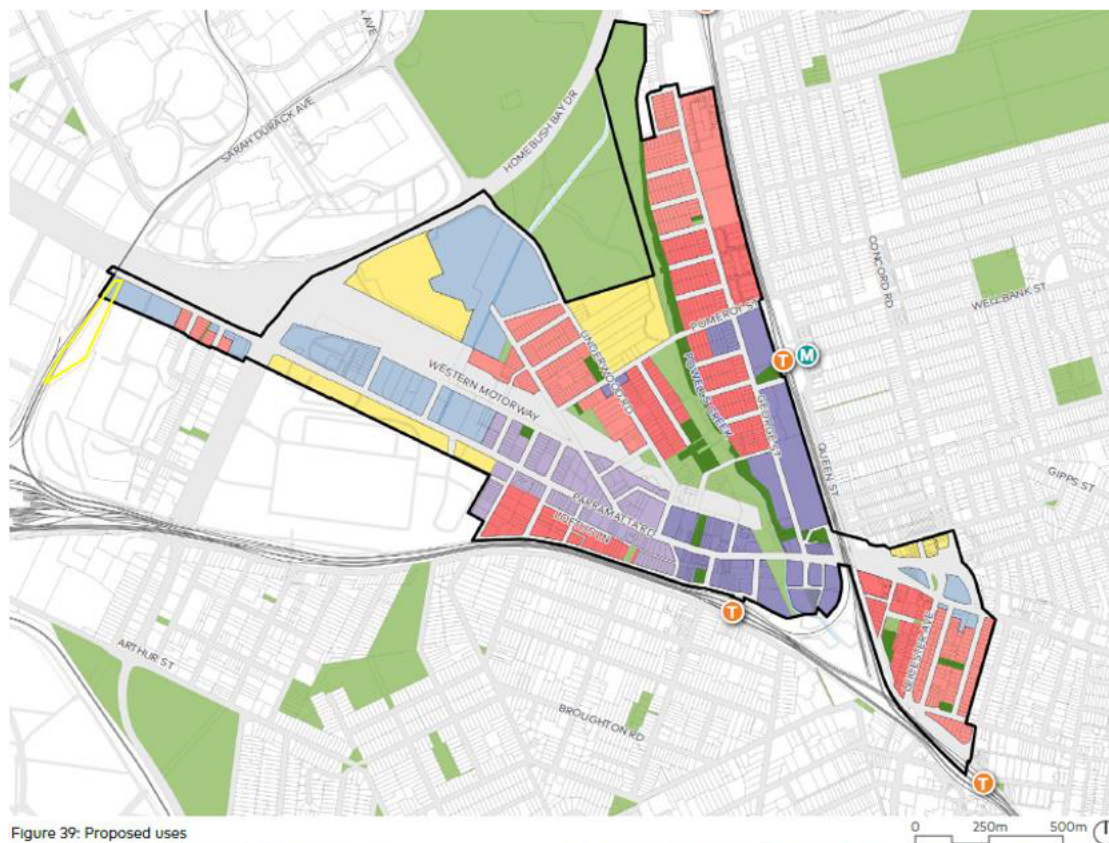


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 ■ Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 ■ Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

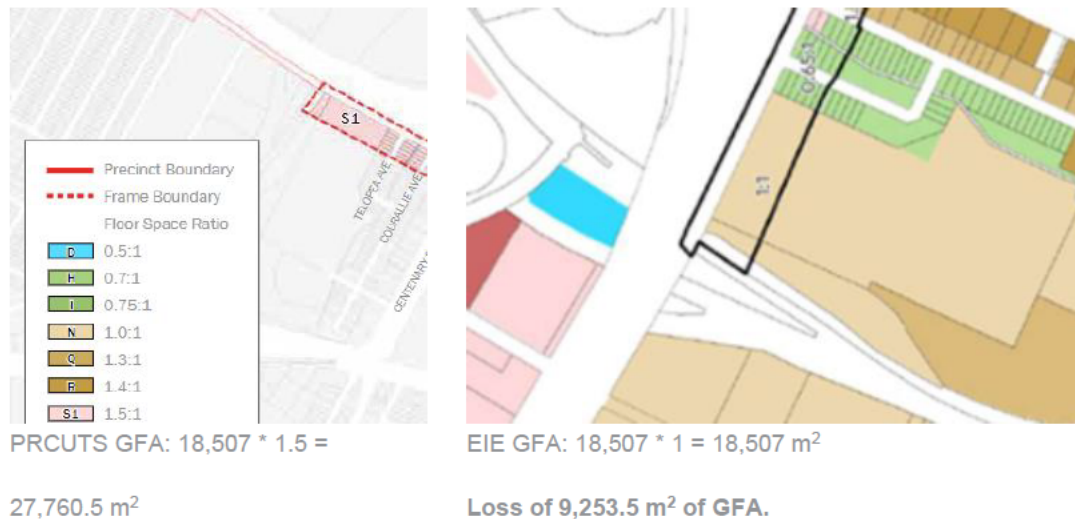


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth
- enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)





with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**





This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

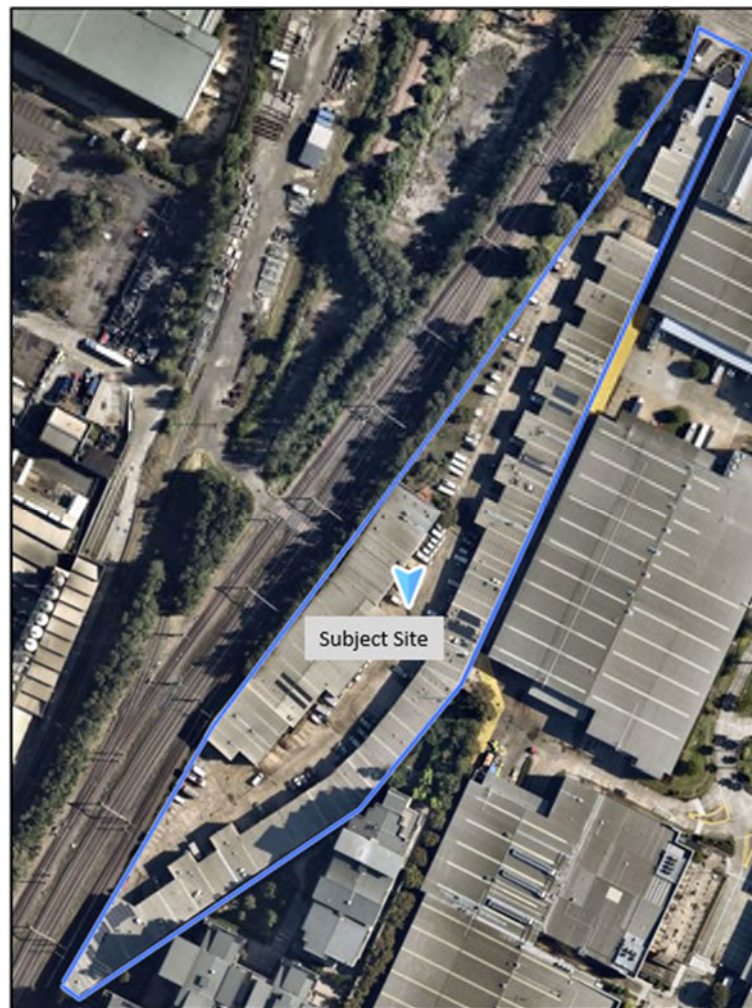


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

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#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

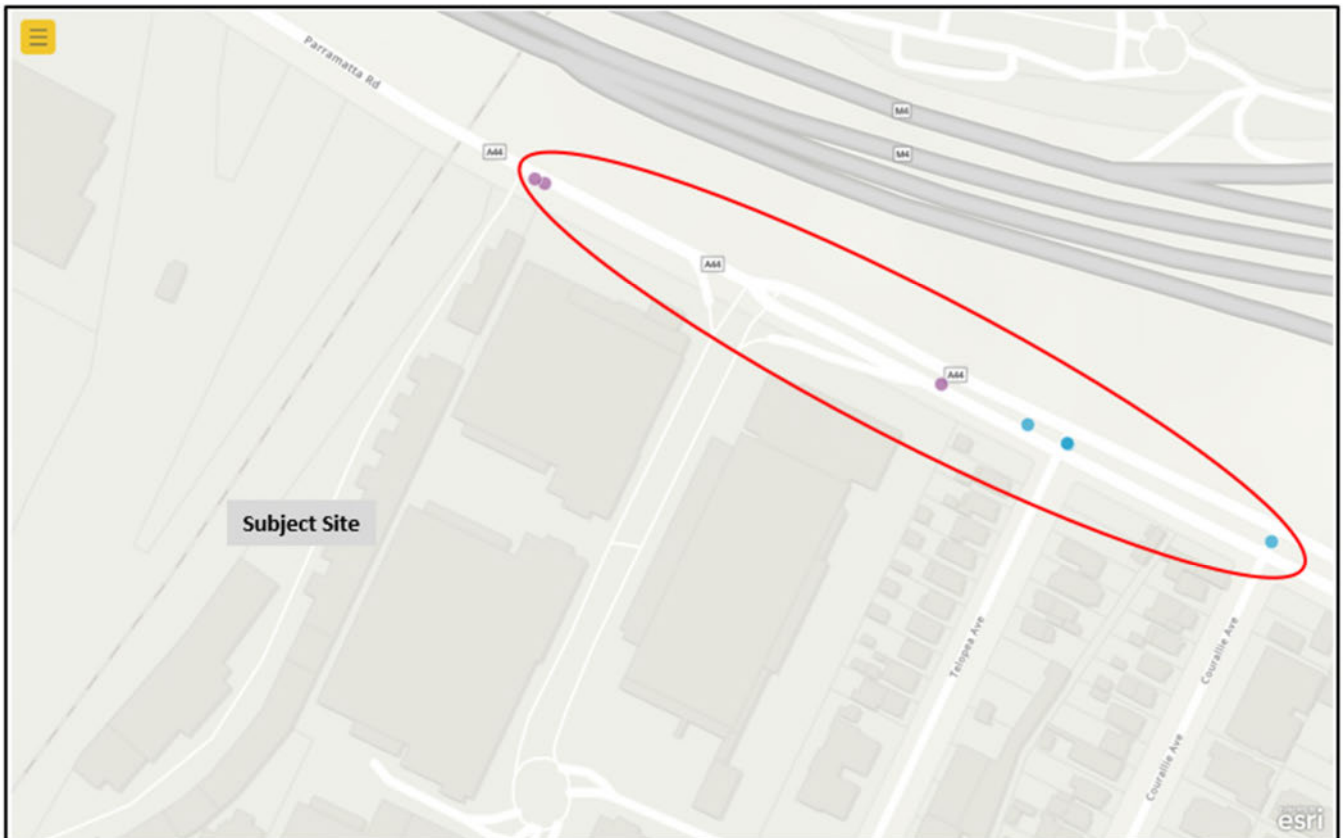


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

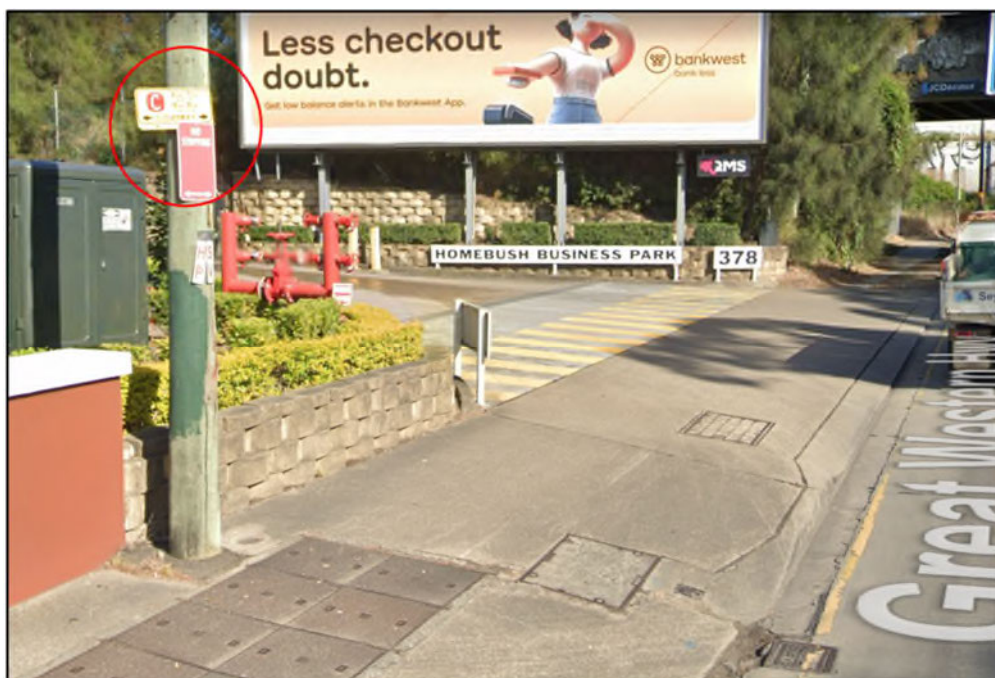


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

## 8 SUMMARY

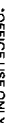
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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.



**Plan Drawing only to appear in this section**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 10:11:14 AM  
**Attachments:** [submission-to-nsw-planning-\(1.pdf\)](#)

---

Submitted on Sat, 24/08/2024 - 10:10

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

SOUTH WENTWORTHVILLE

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning-\(1.pdf\)](#) (1.28 MB)

**Submission**

I agree to the plan for the rezoning proposal for all the land in our campus not only the front.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED] Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED] West 2140

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

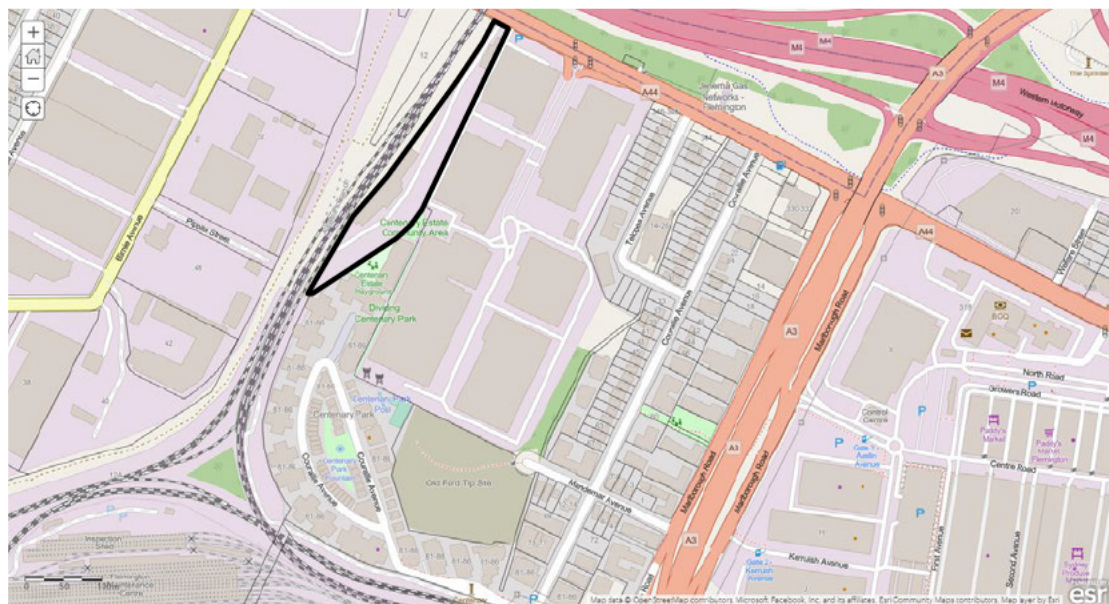


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

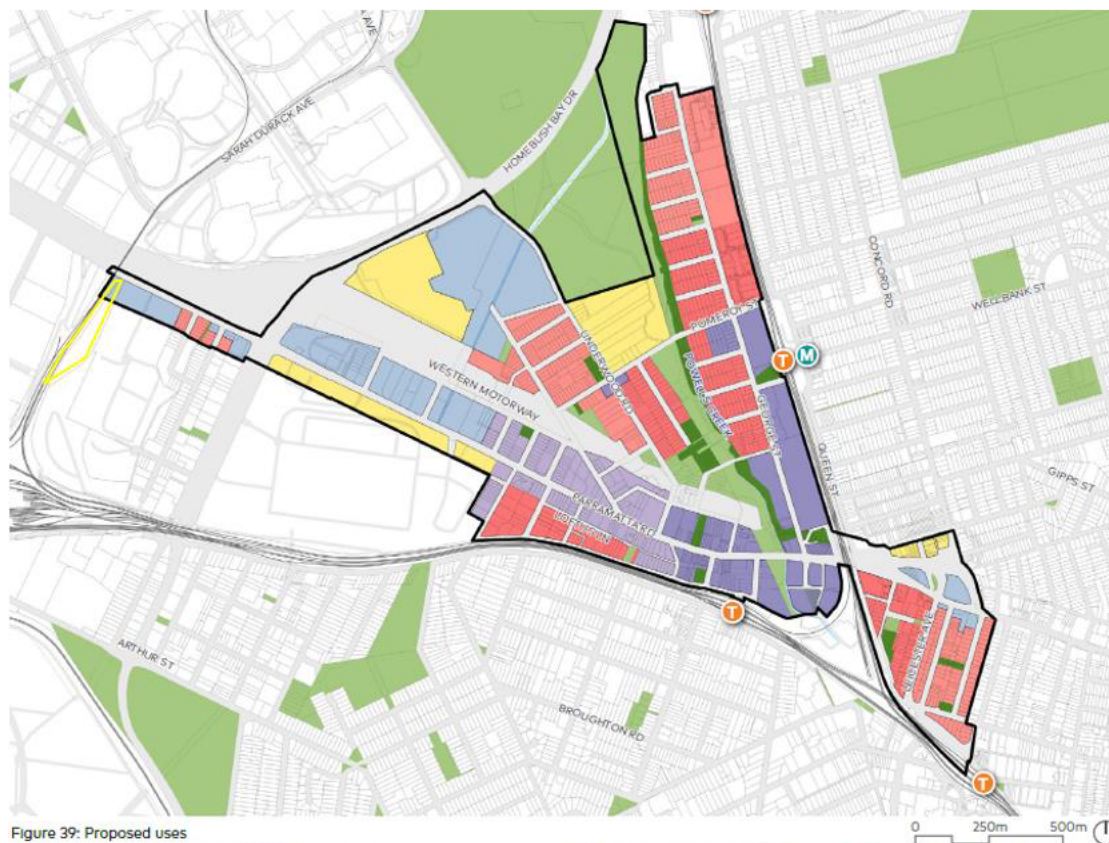


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓

<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓



As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

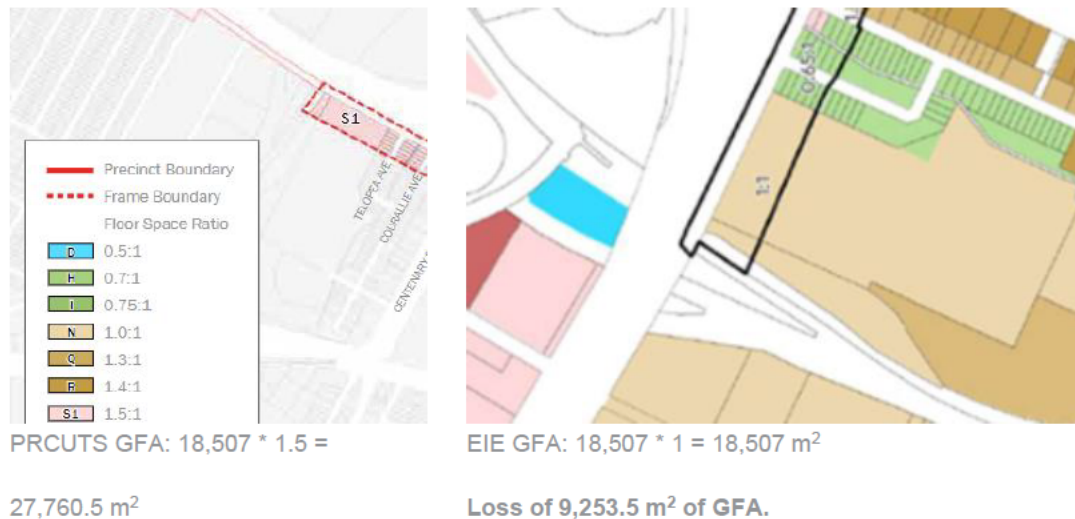


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**





This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy



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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

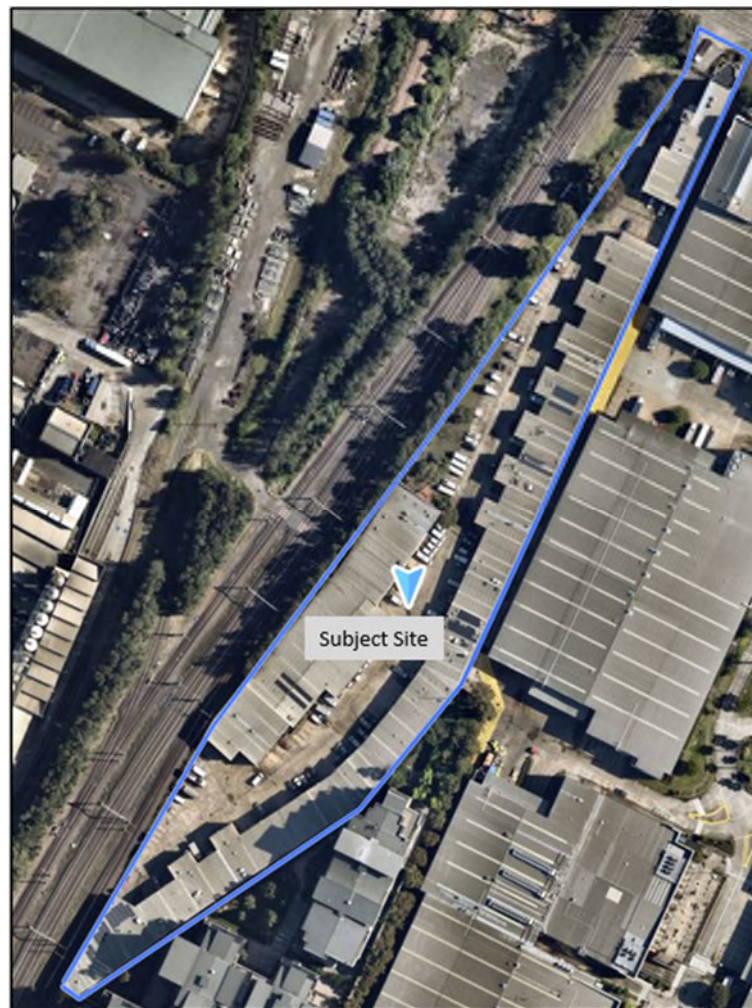


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
→ E	5,197	-	-
← W	5,570	-	-
→ E ← W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
→ E	6,067	-	-
← W	6,244	-	-
→ E ← W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

---

### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.



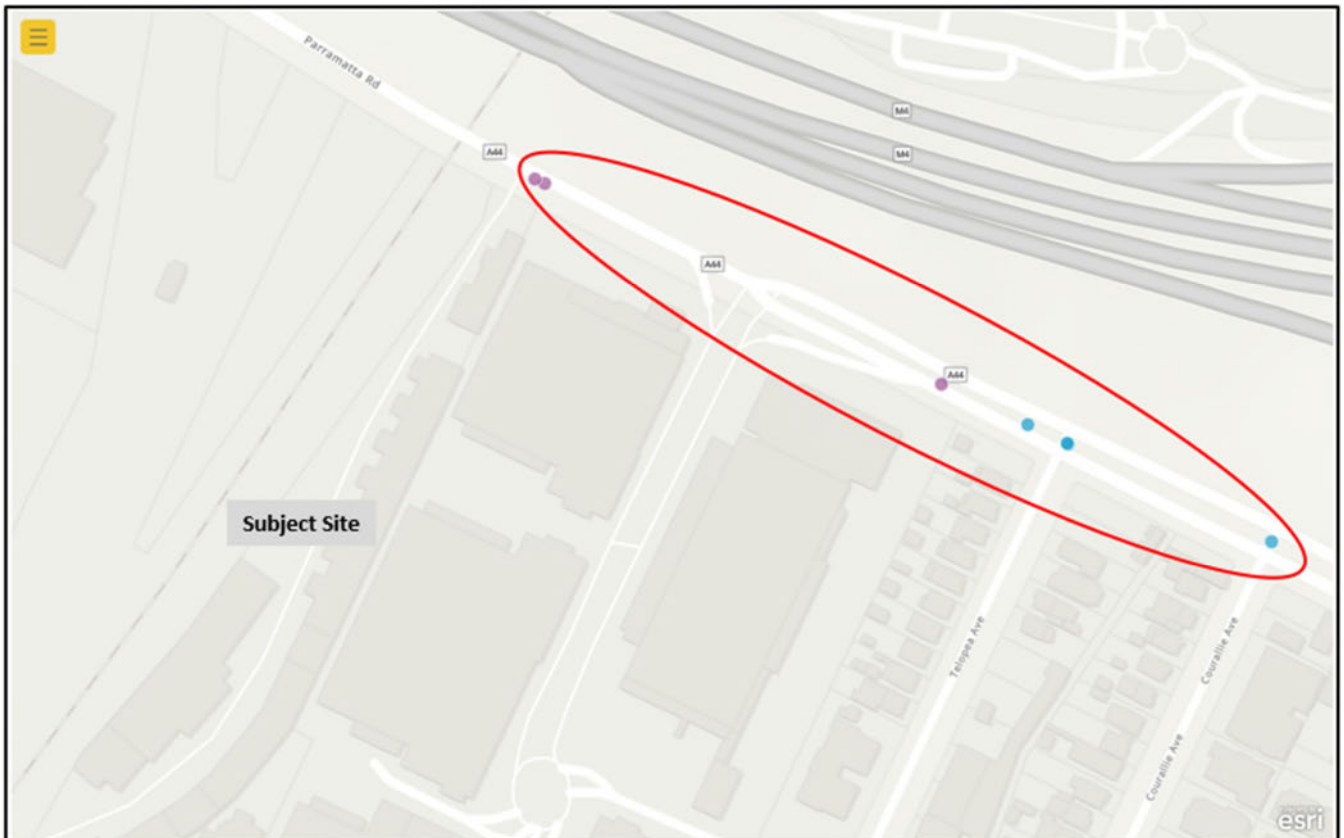


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

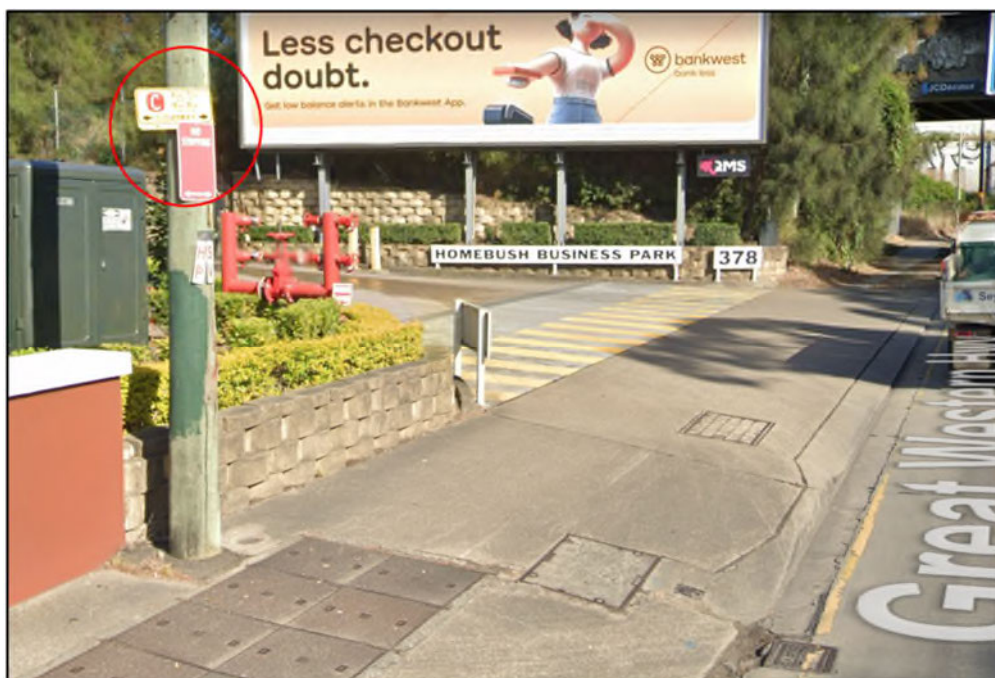


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial



Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

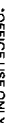
## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

**- Plan Drawing only to appear in this section**

DP 872564



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 12:06:47 PM

---

Submitted on Sat, 24/08/2024 - 12:06

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield 2137

**Please provide your view on the project**

I support it

**Submission**

I support the project.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 12:09:53 PM

---

Submitted on Sat, 24/08/2024 - 12:09

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield 2137

**Please provide your view on the project**

I support it

**Submission**

I support the project.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 6:02:16 PM

---

Submitted on Sat, 24/08/2024 - 18:02

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I object to it

### **Submission**

This is the home that I grew up in from when I was just a baby. My parents bought this home 35 years ago. My mum worked 2 jobs for many years, just to make ends meet - for the purpose of providing us with a safe, stable home in this beautiful area. I have so many amazing memories in this home from my childhood - so much so that myself and my boyfriend worked really hard to be able to buy my childhood home. We love this area, we love the proximity to bicentennial park, we love that we can hear birds in the morning, we love that all the neighbours look after each other, we love the trees, we love that we've bought a home that we will be starting our family in. We want our future children to grow up with a backyard, to feel the grass in their feet, to run around the yard and just be kids. Due to the pricing of Sydney houses, there is absolutely no where else that we could go - we would be forced to buy an apartment just to stay in the area and that is just not an option. Our dream for our future family will literally be ripped out of our hands. Please go elsewhere to provide more homes for the housing crisis. Underwood road is already

congested with traffic as it is. Adding all of these apartment buildings will be a complete nightmare for everyone. Thank you.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 7:26:44 PM  
**Attachments:** [submission-to-nsw-planning-\(1.pdf\)](#)

---

Submitted on Sat, 24/08/2024 - 19:26

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Maria

### **Last name**

De Cillis

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2197

### **Please provide your view on the project**

I object to it

### **Submission file**

[submission-to-nsw-planning-\(1.pdf\)](#) (1.3 MB)

### **Submission**

The proposed extension of rezoning by the New South Wales (NSW) government holds significant promise for the community. By strategically expanding housing development near transport hubs, several key benefits can be realized.

First, this initiative would create employment opportunities in construction and related fields, bolstering the local economy.

Second, it directly addresses the pressing housing shortage in Sydney, providing much-needed homes for families, professionals, and seniors.

Lastly, the proximity to public transport ensures convenient access to essential services, enhancing overall quality of life for residents. In summary, extending the rezoning plan aligns with NSW's vision of sustainable, accessible communities

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED], Homebush West 2140



22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

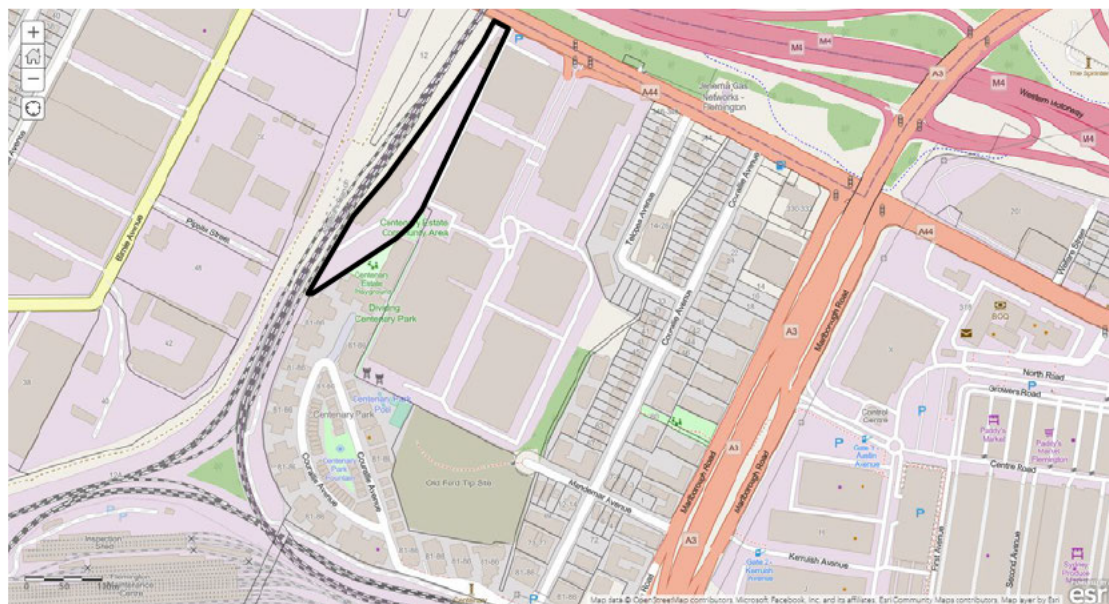


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary



- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

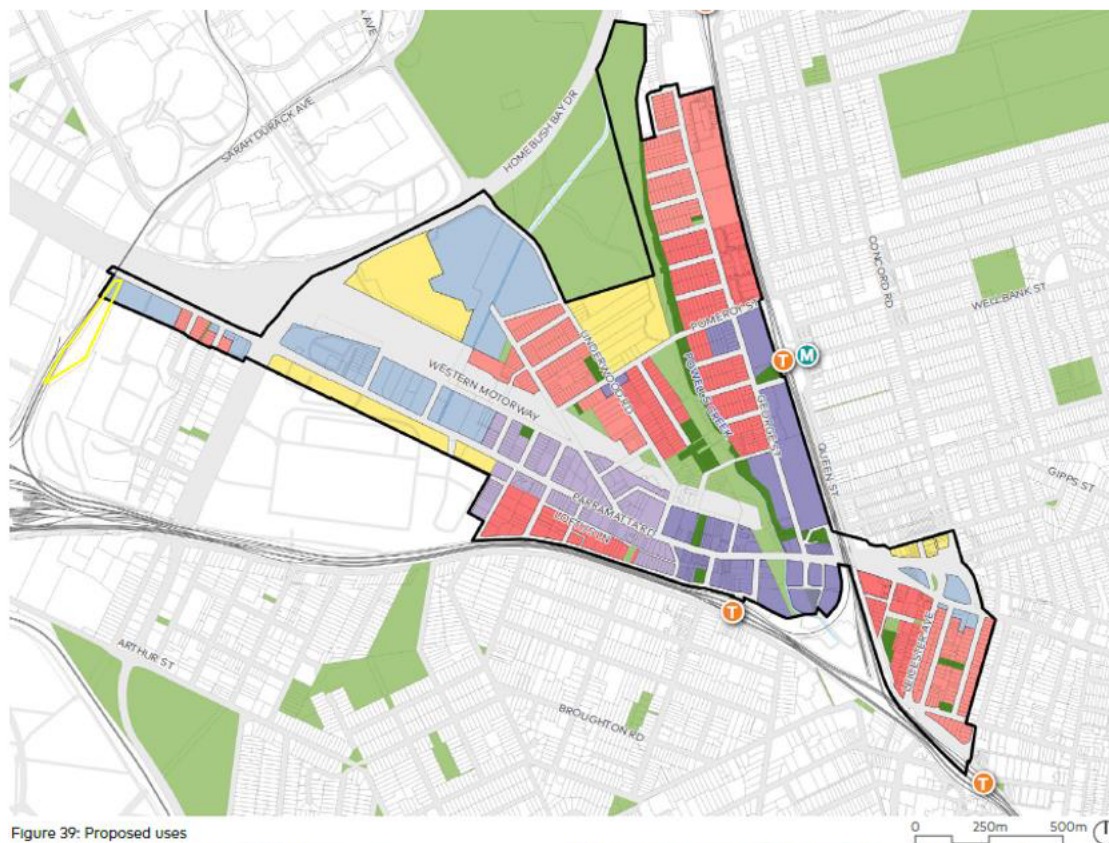


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 ■ Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 ■ Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.

## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

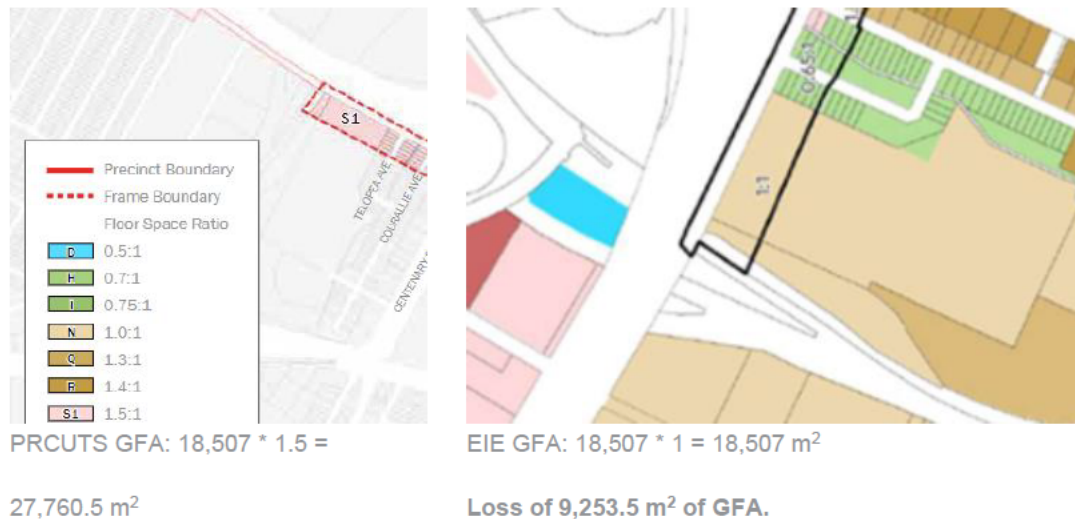


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth
- enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)



with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

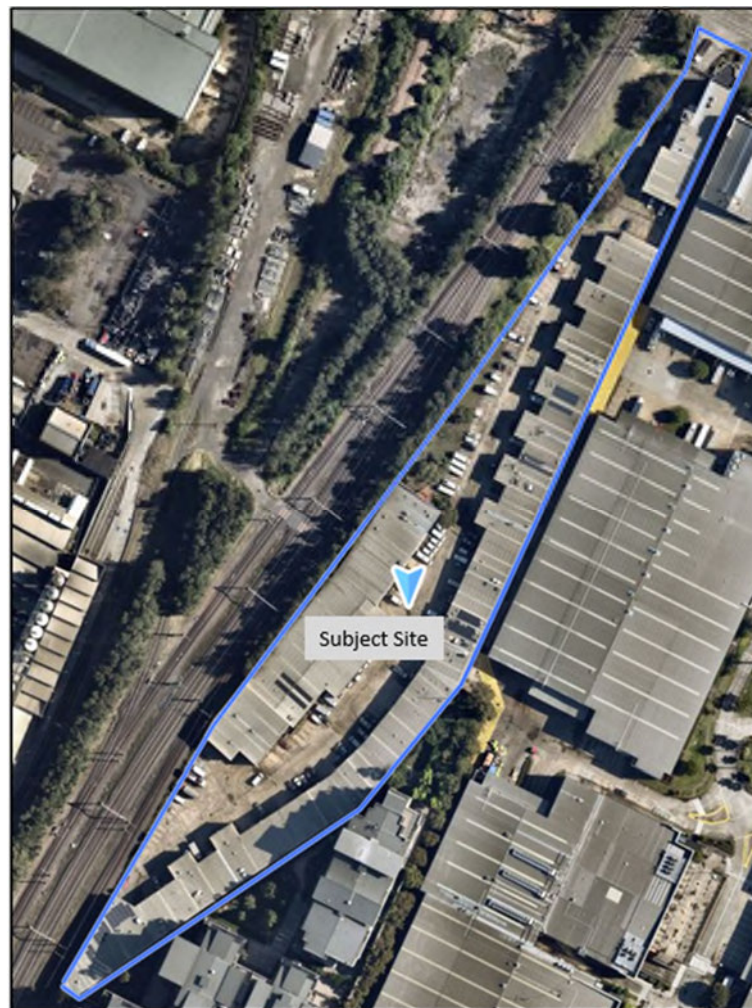


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.



### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

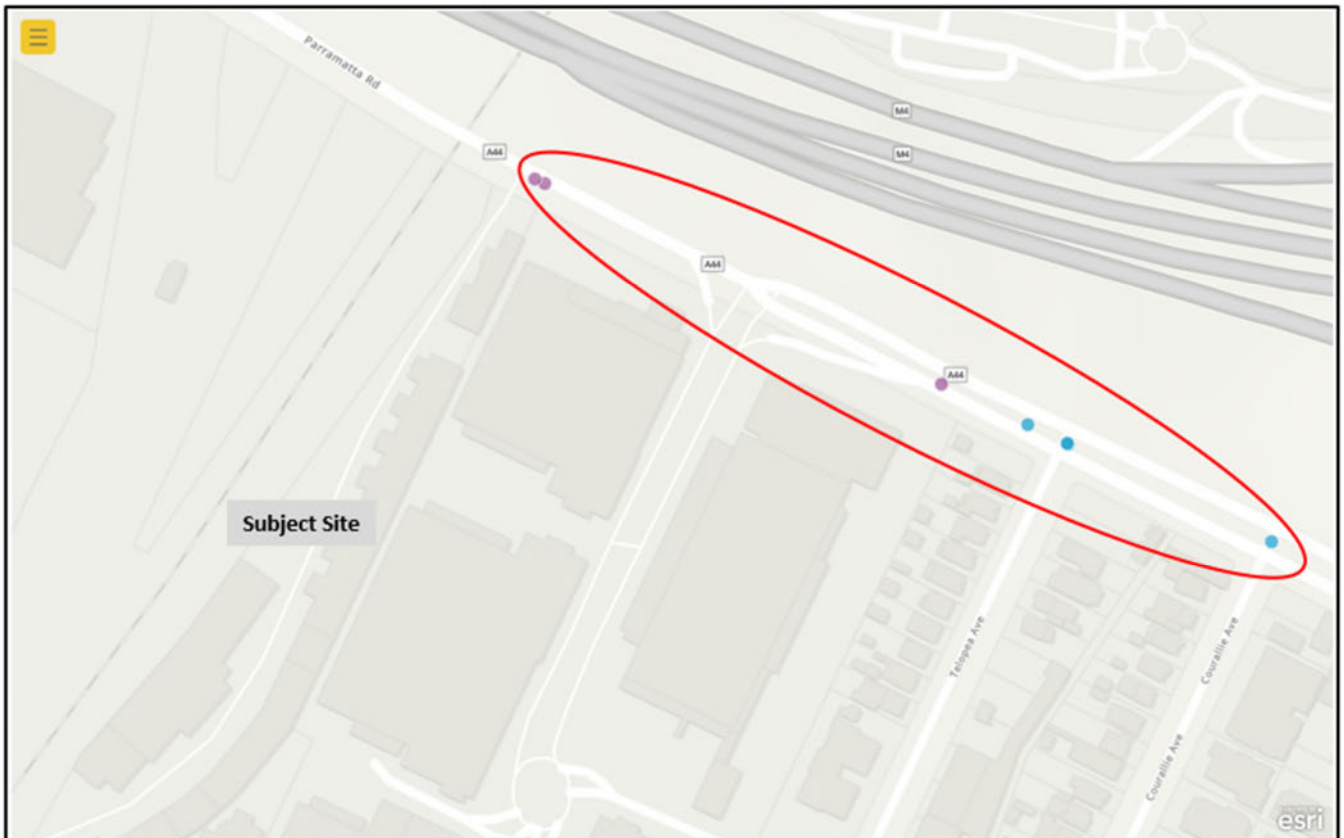


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

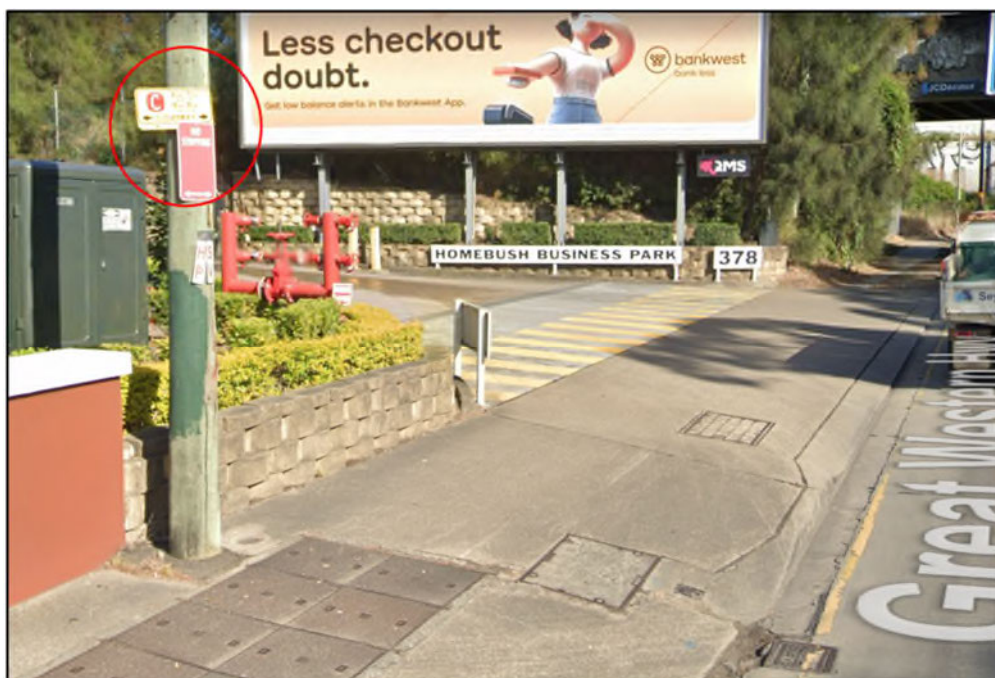


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.



Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

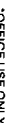
## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

**- Plan Drawing only to appear in this section**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 7:30:42 PM

---

Submitted on Sat, 24/08/2024 - 19:30

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I object to it

### Submission

The proposed extension of rezoning by the New South Wales government holds significant promise for the community. By strategically expanding housing development near transport hubs, several key benefits can be realised. First, this initiative would create employment opportunities in construction and related fields, bolstering the local economy. Second, it directly addresses the pressing housing shortage in Sydney, providing much-needed homes for families, professionals, and seniors. Lastly, the proximity to public transport ensures convenient access to essential services, enhancing overall quality of life for residents.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Saturday, 24 August 2024 9:54:46 PM  
**Attachments:** [tod-submission---alice-mantel-2024-08-23v2.docx](#)

---

Submitted on Sat, 24/08/2024 - 21:52

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

### First name

Alice

### Last name

Mantel

### I would like my name and personal contact details to remain confidential

No

## Info

### Email

[REDACTED]

### Suburb/Town & Postcode

CONCORD WEST

### Please provide your view on the project

I object to it

### Submission file

[tod-submission---alice-mantel-2024-08-23v2.docx](#) (17.49 KB)

### Submission

SUBMISSION IN RESPECT OF TRANSPORT-ORIENTED PROPOSED  
RESIDENTIAL DEVELOPMENT

I wish to express my strong objection to the TOD residential rezoning proposals as most recently advertised on the DPHI website. To give some context to my objection, let me say this:

1. From a planning perspective, the identified Homebush precinct area would have to be the most restricted, unsuitable area for intense high rise residential development in Sydney. It is a low-lying area of 2 square kilometres bounded by two motorways (Homebush Bay Drive and the Western Motorway), Parramatta Road, Powell's Creek which is prone to

flooding and Bicentennial Park.

2. Based on the figures supplied in the report, currently there are 6,800 dwellings in the area. This includes recent redevelopments of townhouses and various sized strata developments up to 8 storeys in height. Current population density therefore, is approximately, 3,400 persons per sq km. This is comparable to Gibraltar or Bahrain. (I am using UN figures) and most major cities/countries have far less density.

3. The proposed TOD development is for a total of 16,100 dwellings coming to a total of 22,900 dwellings (p. 49). Assuming an average of 2.5 persons per dwelling, the total estimated population might be 57,250 persons for the area. The eventual density therefore is 28,625 persons per dwelling per square kilometre. For comparison, the city with the highest population density in the world is Monaco at 25,927 persons per sq km. Hong Kong is 6,747 persons per sq km. This type of density does not indicate good conceptual planning in any sense of modern practice. Surely the aim of good planning is to create a liveable city that recognizes the character of existing houses to blend in with restrained newer buildings and provide both housing and amenity. Unless you are aiming for an award of “Best world slum”!

4. There are additional issues: currently, any commuter wishing to travel on the city-bound train from North Strathfield at peak hour 7.30 – 9.am is likely to be unable to find a seat and in fact, may not be able to get on the train at all. The addition of the metro will not reduce this situation and is more likely to increase over-crowding because more people will be travelling from the west to get into the city.

5. The existing roads in the Homebush precinct are small, two lanes, already basically unable to cope with the usual morning and evening traffic without very long waiting periods. Specifically, travelling west down Pomeroy Street to Underwood Street to go either to Homebush Bay Drive or towards Parramatta Road is jammed already for 15-20 minutes on any morning. Going south down George Street past the OLA school is jammed at school pick-up times. That is now; it will be unbelievable after quadrupling the local population. These are narrow two-lane streets and simply introducing an additional street will not relieve the existing congestion, let alone future congestion.

6. George Street at the Bakehouse Quarter is basically already a pedestrian plaza because people stroll between shops and cafes. To suggest this area is not a vibrant precinct and that it needs revitalization is uninformed. I suggest your representative visits the area at 8pm on any evening of the week to experience a very lively dining scene.

7. There is nothing in the report that indicates that any consideration has been given to the provision of significant additional open space – what is mentioned is already there – around Powell Creek for example. Nor is there any provision for additional facilities such as childcare centres, medical centres, community facilities. How would the children of an extra 50,000 residents access local public schools that are already well over their limit? How would they access hospital facilities when Concord Hospital has already reached the capacity estimated in 2015?

8. Considering the draft building plans that have been included in the report, it is clear that many areas in every building will experience less than 2 hours of sunshine per day, no doubt caused by the sheer height of the buildings and their proximity to each other. The overshadowing caused by so many proposed 24-30 storey buildings is a serious concern for any planner and in my opinion, it is a failure of professional competence to plan in such a manner, knowing that will be the consequence.



9. UK research has shown that living in very large residential developments leads to a fragmented, isolated population. In addition, there are so many unacknowledged aspects of building such large – over 10 storey developments. Simply building more and more apartments does not solve the housing crisis, nor does it mean those apartments will become more affordable. The additional construction costs of building very high towers means those apartments are actually more expensive to buy or sell. The likelihood of having more building faults, as seen with the examples of the Opal and Mascot towers demonstrates that rectification can be prohibitively expensive. Such tall buildings require far more additional safety infrastructure, lifts and stairs – all of which lead to very high ongoing maintenance costs – that are not affordable for an average family, even with two working adults.

10. I support some additional medium rise development in the Homebush precinct that is limited to no more than 7 storeys with a restricted footprint that ensures a guaranteed setback from the street, at least 25% open space for rest and recreation, underground parking and an imposed tree planting program to provide shade for residents.

11. Most of all, the report shows no calculation of the required additional infrastructure – schools, hospitals, green space, commercial space, sporting facilities, and more – with zero land reserved for it. There is no expressed commitment for social housing. This is a plan with no concern for the basic fundamentals of planning – it has totally ignored the need to provide for the future. It is an entirely unprofessional, worthless report that attempts to meet a political purpose with no regard for residents who feel threatened by this steamroller approach. Please do a massive rethink of this report in line with good planning principles.

[REDACTED]

Concord West NSW 2138

[REDACTED]

**I agree to the above statement**

Yes

## SUBMISSION IN RESPECT OF TRANSPORT-ORIENTED PROPOSED RESIDENTIAL DEVELOPMENT

I wish to express my strong objection to the TOD residential rezoning proposals as most recently advertised on the DPHI website. To give some context to my objection, let me say this:

1. From a planning perspective, the identified Homebush precinct area would have to be the most restricted, unsuitable area for intense high rise residential development in Sydney. It is a low-lying area of 2 square kilometres bounded by two motorways (Homebush Bay Drive and the Western Motorway), Parramatta Road, Powell's Creek which is prone to flooding and Bicentennial Park.
2. Based on the figures supplied in the report, currently there are 6,800 dwellings in the area. This includes recent redevelopments of townhouses and various sized strata developments up to 8 storeys in height. Current population density therefore, is approximately, 3,400 persons per sq km. This is comparable to Gibraltar or Bahrain. (I am using UN [figures](#)) and most major cities/countries have far less density.
3. The proposed TOD development is for a total of 16,100 dwellings coming to a total of 22,900 dwellings (p. 49). Assuming an average of 2.5 persons per dwelling, the total estimated population might be 57,250 persons for the area. The eventual density therefore is 28,625 persons per dwelling per square kilometre. For comparison, the city with the highest population density in the world is Monaco at 25,927 persons per sq km. Hong Kong is 6,747 persons per sq km. This type of density does not indicate good conceptual planning in any sense of modern practice. Surely the aim of good planning is to create a liveable city that recognizes the character of existing houses to blend in with restrained newer buildings and provide both housing and amenity. Unless you are aiming for an award of "Best world slum"!
4. There are additional issues: currently, any commuter wishing to travel on the city-bound train from North Strathfield at peak hour 7.30 – 9.am is likely to be unable to find a seat and in fact, may not be able to get on the train at all. The addition of the metro will not reduce this situation and is more likely to increase over-crowding because more people will be travelling from the west to get into the city.
5. The existing roads in the Homebush precinct are small, two lanes, already basically unable to cope with the usual morning and evening traffic without very long waiting periods. Specifically, travelling west down Pomeroy Street to Underwood Street to go either to Homebush Bay Drive or towards Parramatta Road is jammed already for 15-20 minutes on any morning. Going south down George Street past the OLA school is jammed at school pick-up times. That is now; it will be unbelievable after quadrupling the local population. These are narrow two-lane streets and simply introducing an additional street will not relieve the existing congestion, let alone future congestion.
6. George Street at the Bakehouse Quarter is basically already a pedestrian plaza because people stroll between shops and cafes. To suggest this area is not a vibrant precinct and that it needs revitalization is uninformed. I suggest your representative visits the area at 8pm on any evening of the week to experience a very lively dining scene.
7. There is nothing in the report that indicates that any consideration has been given to the provision of significant additional open space – what is mentioned is already there – around

Powell Creek for example. Nor is there any provision for additional facilities such as childcare centres, medical centres, community facilities. How would the children of an extra 50,000 residents access local public schools that are already well over their limit? How would they access hospital facilities when Concord Hospital has already reached the capacity estimated in 2015?

8. Considering the draft building plans that have been included in the report, it is clear that many areas in every building will experience less than 2 hours of sunshine per day, no doubt caused by the sheer height of the buildings and their proximity to each other. The overshadowing caused by so many proposed 24-30 storey buildings is a serious concern for any planner and in my opinion, it is a failure of professional competence to plan in such a manner, knowing that will be the consequence.
9. UK research has shown that living in very large residential developments leads to a fragmented, isolated population. In addition, there are so many unacknowledged aspects of building such large – over 10 storey developments. Simply building more and more apartments does not solve the housing crisis, nor does it mean those apartments will become more affordable. The additional construction costs of building very high towers means those apartments are actually more expensive to buy or sell. The likelihood of having more building faults, as seen with the examples of the Opal and Mascot towers demonstrates that rectification can be prohibitively expensive. Such tall buildings require far more additional safety infrastructure, lifts and stairs – all of which lead to very high ongoing maintenance costs – that are not affordable for an average family, even with two working adults.
10. I support some additional medium rise development in the Homebush precinct that is limited to no more than 7 storeys with a restricted footprint that ensures a guaranteed setback from the street, at least 25% open space for rest and recreation, underground parking and an imposed tree planting program to provide shade for residents.
11. Most of all, the report shows no calculation of the required additional infrastructure – schools, hospitals, green space, commercial space, sporting facilities, and more – with zero land reserved for it. There is no expressed commitment for social housing This is a plan with no concern for the basic fundamentals of planning – it has totally ignored the need to provide for the future. It is an entirely unprofessional, worthless report that attempts to meet a political purpose with no regard for residents who feel threatened by this steamroller approach. Please do a massive rethink of this report in line with good planning principles.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 4:06:58 PM

---

Submitted on Sun, 25/08/2024 - 16:06

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Nancy

### **Last name**

Ilacqua

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Concord 2137

### **Please provide your view on the project**

I object to it

### **Submission**

I am writing to express my concerns about the proposed high-density apartment development in our community. While I understand the need for growth and development, I believe this proposal does not align with the character and needs of our area.

Our community has always been a place where residents value the sense of connection, open spaces, and the unique character that defines our neighborhood. The current proposal for high-density apartments does not appear to integrate with the existing look and feel of our area. Instead, it risks turning our community into a high-density concrete jungle, which is not what the residents desire.

Moreover, the area is already experiencing significant congestion. The roads are struggling to cope with the current traffic volume, and this development would exacerbate the problem. There seems to be a lack of planning regarding the infrastructure needed to

support such a development, particularly concerning schools, daycare facilities, and medical services.

The scale of this proposal is out of proportion to our community's needs and desires. We urge you to reconsider this plan and work with the residents to find a more suitable solution that preserves the integrity and character of our neighborhood.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 6:58:27 PM  
**Attachments:** [20240825-transport-oriented-development-tod-rezoning-proposal-no-names.pdf](#)

---

Submitted on Sun, 25/08/2024 - 18:52

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Strathfield

**Please provide your view on the project**

I support it

**Submission file**

[20240825-transport-oriented-development-tod-rezoning-proposal-no-names.pdf](#) (468.05 KB)

**Submission**

Please see attached.

**I agree to the above statement**

Yes

Residents of [REDACTED]

Strathfield 2135

25 August 2024

Department of Planning, Housing and Infrastructure

Dear Minister,

**Re – Homebush Precinct – Transport Oriented Development (TOD) – Public Consultation**

Reference is made to your letter dated 16 July 2024 that was sent to us as **Property Owners** regarding the TOD and its impact on the rezoning proposal of the Homebush Precinct.

The heritage listed homes on Manson Road Strathfield (together with the heritage listed homes on Leicester Avenue Strathfield and Swan Avenue Strathfield will be impacted by the medium density rezoning proposal. All of these properties are one story high and they are used for residential purposes.

There are a total 12 heritage listed houses on Manson Road Strathfield, Leicester Avenue Strathfield and Swan Avenue Strathfield. See the listing of heritage properties, here in this link: [http://classic.austlii.edu.au/au/legis/nsw/consol\\_reg/cblep2013269/sch5.html](http://classic.austlii.edu.au/au/legis/nsw/consol_reg/cblep2013269/sch5.html)

The following points are made:

1. It has been said that part of the rezoning proposal is to have a certain percentage of affordable housing; some are to be owned by private owners, some are to be publicly owned. There should a greater proportion of publicly owned housing on Manson Road Strathfield, Swan Avenue Strathfield and Leicester Avenue Strathfield than privately owned ones. These homes / units should be provided for essential workers, including nurses, teachers, emergency services, very low income people and homeless.
2. If there is there to be rezoning then all of the heritage listed properties should be **de-listed** as single story heritage listed properties. Consequently, the relevant regulations which list them as heritage items should be repealed. These heritage items include houses **#10, 14, 16, 18, 20, 22, 24** and **30** Manson Road Strathfield. This would create an opportunity to use all of the available land on these blocks in the rezoning proposal to provide more publicly funded and owned properties for the development. The reason that there are heritage listed properties on Manson Road Strathfield, **#5** and **#7** Leicester Avenue Strathfield, **#19** and **#20**



Swan Avenue Strathfield is not only because of the supposed architectural character of the houses but the affordability of them. All of the aforementioned properties are on smaller blocks of between 200 – 250 square metres. When the Property Owners first moved to Manson Road in 2001, it was not because the houses were heritage listed, it was because their prices were affordable.

3. Imagine what could be done in a new development if all of these heritage listed properties were de-listed and turned to well designed, heritage style unit block 10 stories high. It is submitted that a private developer should partner with a NSW government entity to design a development of up to 10 stories for teachers, nurses, emergency service workers and their families and also other people who are struggling to rent, including the homeless. For eg, 50-75% of the new development could be allocated to publicly owned housing. If there is a preference to maintain the heritage character of Manson Road Strathfield and Leicester Avenue Strathfield and Swan Avenue Strathfield, then there should be 6-10 story high unit blocks designed in a heritage character. It should be done on an economies-of-scale basis to decrease the price of each new unit. As a result, there could hundreds of units / homes built on these parcels of land which are currently heritage listed.
4. If the heritage listed properties were to be de-listed, then:
  - a. Set up a transparent process to allow the heritage listed properties to be de-listed;
  - b. Create a process whereby there is a government panel / process to work jointly with the developer to drive a re-zoning and development that ensures that heritage listed owners are appropriately paid a market price by a factor of at least x2. For eg, if the current market value of a 200 square metre heritage listed property is \$1.6 million, then a premium price of at least \$3.2 million should be provided to the relevant owner. This is on the basis that the heritage listed owner cannot buy the same or similar sized parcel of land with a heritage style building that is affordable in the Homebush Precinct. These owners would be forced to compete on the market to buy bigger properties outside of the Homebush Precinct which will be probably more than \$3.2 million.
  - c. Take into account the individual circumstances of the Property Owners; in particular, their health or lack thereof, for egg, disability and lesser late stage career employment prospects, noting that, for egg, the Property Owners are in their mid-50s and will not be in the work force as long as a young person of 25 years of age which means they would have less income earning potential and borrowing prospects. In addition, note that

the some of the heritage listed properties on Manson Road Strathfield currently are rented out and have been so for many years. By contrast, other heritage listed properties on Manson Road Strathfield properties are owner occupied. Putting aside any emotional attachment to the rented heritage listed properties and occupied owner properties, if there is a well designed plan to build affordable housing, then that goal should be given priority whilst taking into account the individual heritage listed owners' circumstances if they decided to sell up and leave the area should any new development proceed.

- d. Continue to discuss the rezoning proposal with the Property Owners regarding the stages of development and please do not leave them in the lurch to deal with unsympathetic bureaucrats and greedy developers. Also, consider inviting into the discussion other heritage listed property owners and other owners in the area impacted by the rezoning proposal.
- e. Plan and design a future development to integrate heritage elements on a large scale. There is no point maintaining single story heritage buildings on Manson Road Strathfield, Leicester Avenue Strathfield and Swan Avenue Strathfield to preserve them as "museum pieces". There are better, enhanced examples of heritage listed private properties to preserve in other parts of the Inner West of Sydney. A well thought out 10-story development with it being majority publicly owned can still incorporate the style and character of a heritage house if there is the political will, community engagement and appropriate design and funding by the NSW government.

#### **Summary of further points to help improve the re-zoning proposal**

1. Ensure vehicular and pedestrian connections proposed are adequate for the higher density proposed.
2. The proposed open green space on Manson Road Strathfield and Swan Avenue Strathfield is insufficient to create a vibrant residential community. On balance, the space should be used for living purposes that is consistent with the goal of providing more affordable housing. Don't waste the space with a park that is not big enough to properly enjoy and which may become a soulless space for dogs to do their "business".
3. Consider building additional public transport, a light-rail, along the entirety of Parramatta Road up to Parramatta, and not just from the CBD to Summer Hill.

4. There is ample land available right now to meet the commercial and residential demand in our part of Strathfield over the next 25 years under the City of Canada Bay LEP 2013.

Specifically,

- a. The existing City of Canada Bay LEP 2013 provides for a large amount of additional apartments plus substantial additional commercial space. Outside the Town Centre of Strathfield the existing City of Canada Bay LEP provides for around half of this amount of additional apartments – this be reviewed revised again if it has not been already;
- b. Hundreds of apartments have already been built since the LEP came into effect and there are hundreds more being built along Parramatta Rd (Homebush Precinct). This means there is at least 25 years of supply available with the current City of Canada Bay LEP controls. This also demonstrates that the current LEP provides the appropriate additional commercial floor space and residential dwellings for the foreseeable future, as a 25 year supply timeframe is consistent with good planning practice;
- c. **No consideration of additional areas for high density in the Homebush Precinct should take place until and least 75% of the current available supply is constructed (i.e. at least 15 years' time).** Otherwise, we will end up with a very large area of patchwork, with low and high density side by side for tens of years, and the poor amenity and lack of social and economic cohesion that this brings;
- d. While the rezoning is premised on Westconnex being built to improve Parramatta Road, existing traffic volumes on Parramatta Road on weekends is not sustainable and on weekday peak periods very busy. This is because of the high toll price on the M4. Traffic modelling has proven wanting in almost all recent Australian motorway projects. In particular, the value used for private travel time reductions has been discredited. **Therefore, it would be prudent to assess the actual changes in traffic on Parramatta Road after all stages of Westconnex are constructed and fully operational, before any intensification of land use that leads to increased traffic generation is considered in the Homebush Precinct, particularly Manson Rd Strathfield and Leicester Avenue Strathfield.** Again, there would be a risk of a patchwork of development that would impact on traffic capacity, and that would be a poor amenity outcome;
- e. The previous NSW Government (under the Liberal Government) had a plan for Growing Sydney. Direction 2.1 of that document stated that “Growth will be supported by infrastructure including transport, utilities and social infrastructure such as schools, childcare centres, health facilities, open space

and recreation...” . **No change in planning controls proposing additional areas for high density in the Homebush precinct should be considered until capacity, environmental constraints, structure plan, overshadowing and privacy, are analysed and tested**; for eg, there will be substantial overshadowing on the heritage listed houses at #10, 14, 16, 18, 20, 22, 24 and 30 Manson Road Strathfield (if these were not knocked down (under a de-listing of heritage status) for any new development under the proposed rezoning and they continued to remain after the development) if 10 story blocks were built in all directions of the compass surrounding them. Please take into account that some owners of these heritage listed homes are planning to have solar panels on their roof and the solar panel efficiency level would significantly reduce if overshadowing occurs. Consider having the step-back of buildings in the new development. Note also that substantial overshadowing of any new development would affect the natural internal lighting of the properties and impact on the mental well-being of the relevant owners in an adverse manner.

- f. An improved infrastructure plan must include new street layouts for vehicular, public transport and pedestrian connectivity, high quality public domain, stormwater drainage upgrades to remove high risk flood event overland flows, new local neighbourhood parks, additional NSW government facilities and services to cater for the increased population and workers. The mechanism for preserving the lands needed for this infrastructure must also be included in the plan; and genuine and transparent public consultation on these plans and reports are completed;
- g. If Urban Growth were to benchmark the public infrastructure required for the whole Parramatta Road Urban Renewal Project against other successful urban renewal projects, the appropriate figure would be up \$10 billion;
- h. A significant percentage of the public infrastructure would also need to be forward funded in advance of private sector investment. From benchmarks, this would be around \$5 billion-\$10 billion;
- i. No consideration of additional areas for high density in the Homebush Precinct, particularly Manson Road Strathfield, Leicester Avenue Strathfield and Swan Avenue Strathfield should take place until all the infrastructure identified in the infrastructure plan (including state and local social infrastructure) has a robust funding mechanism that guarantees the finances required, and a commitment by the NSW government for the required forward funding of public infrastructure is made.

In summary, this submission has provided points for consideration of the rezoning of heritage listed properties on Manson Road Strathfield, Leicester Avenue Strathfield and Swan Avenue, Strathfield which are within the Homebush Precinct. We would welcome the opportunity to personally discuss the highlighted issues with you.

Yours sincerely,

Residents of [REDACTED]

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 7:23:29 PM

---

Submitted on Sun, 25/08/2024 - 19:23

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2124

**Please provide your view on the project**

I object to it

### **Submission**

Hello , I object to this recommendation, reason being it should be part of TOD, and right now the outlook of these buildings looks no good, therefore I request to remove them so we can rebuild to support the TOD

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 8:55:12 PM  
**Attachments:** [20221107---councils-response---welfare-street-conservation-area---mr.-clement-lun.pdf](#)

---

Submitted on Sun, 25/08/2024 - 20:54

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Clement

### **Last name**

Lun

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Homebush West 2140

### **Please provide your view on the project**

I object to it

### **Submission file**

[20221107---councils-response---welfare-street-conservation-area---mr.-clement-lun.pdf](#)  
(63.48 KB)

### **Submission**

The Homebush TOD rezoning proposal recommended that Welfare Street Conservation Area (C6) be retained. My submission is to reject this recommendation. This location is ideal for rezoning, uplift and redevelopment and should be included for TOD rezoning. It is a 7 minute walk to Flemington Station. It is bounded by M4, A3 and A44 which are major arterial roads. I support government's vision for the TOD and that heritage/conservation should not get in the way of providing more housing for the people of Sydney. According to the Department of Planning, Greater Sydney will need 28,500 new homes per year.



The 12 houses are now adjacent to a 24 hour warehouse complex, which opened in 2022. The residents have had to put up with great noise and pollution during construction. They continue to put up with trucks and other vehicles entering and exiting 24 hours 7 days a week.

The small community of 12 houses are very active and have participated in various DA submission panel meetings over the past few years. In fact, after the last Objectors Meeting for DA2021.85, the Panel gave a recommendation that Council should remove the Conservation status for the houses. A letter I received from Strathfield Council dated 3 Nov 2022 stated: "You are advised that at the Council's meeting of 4 October 2022, the following resolution was made: "6. That Council investigates the residents request for the removal of the Conservation Area located at Welfare St and Flemington Rd, Homebush West with a view of increasing its capacity as an employment zone""

Unlike other heritage areas, there are no other houses or residents nearby that will be impacted by removal. It is surrounded by warehouses, pubs and Sydney Markets and a future hotel. It really is an isolated pocket, which is frankly out of place.

I want to add that the 12 houses as well as the warehouse fronting Parramatta Rd (199 Parra Rd) are on a united front on this issue. Unlike most resident action groups, we are progressive and welcome development.

In conclusion, I request the Department of Planning to consider the removal of the Welfare Street Conservation Area (C6), so as to be included as part of the TOD rezoning.

**I agree to the above statement**  
Yes

3 November 2022

██████████  
██████████  
HOMEBUSH WEST NSW 2140

## Welfare Street Conservation Area

Dear Sir/Madam,

This is in reference to your letter dated 29 October 2022 seeking an update on the status of the review of the Welfare Street Conservation Area "C6" – a group of Inter-war bungalow style houses between Flemington Road and Welfare Street.

Council thanks you for reaching out and notes that the Planning division are aware of the concerns the construction of the warehouse/distribution centre the residents of the heritage conservation area have raised. The construction of the warehouse/distribution centre that was approved through the complying development process is to our understanding causing nuisance to residents surrounding the area.

You are advised that at the Council's meeting of 4 October 2022, the following resolution was made:

*"6. That Council investigates the residents request for the removal of the Conservation Area located at Welfare St and Flemington Rd, Homebush West with a view of increasing its capacity as an employment zone"*

Council's Heritage Specialist will continue to review the matter and will report at a future time the outcomes of this review.

Kind Regards,

██  
██  
██

Acting Director, Planning & Environment

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 9:07:59 PM  
**Attachments:** [submission-to-nsw-planning\\_sp60097.pdf](#)

---

Submitted on Sun, 25/08/2024 - 21:00

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Epping

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning\\_sp60097.pdf](#) (1.3 MB)

**Submission**

I am the [REDACTED]. I am supporting the rezoning of the whole block of SP60097.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED], Homebush West 2140

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

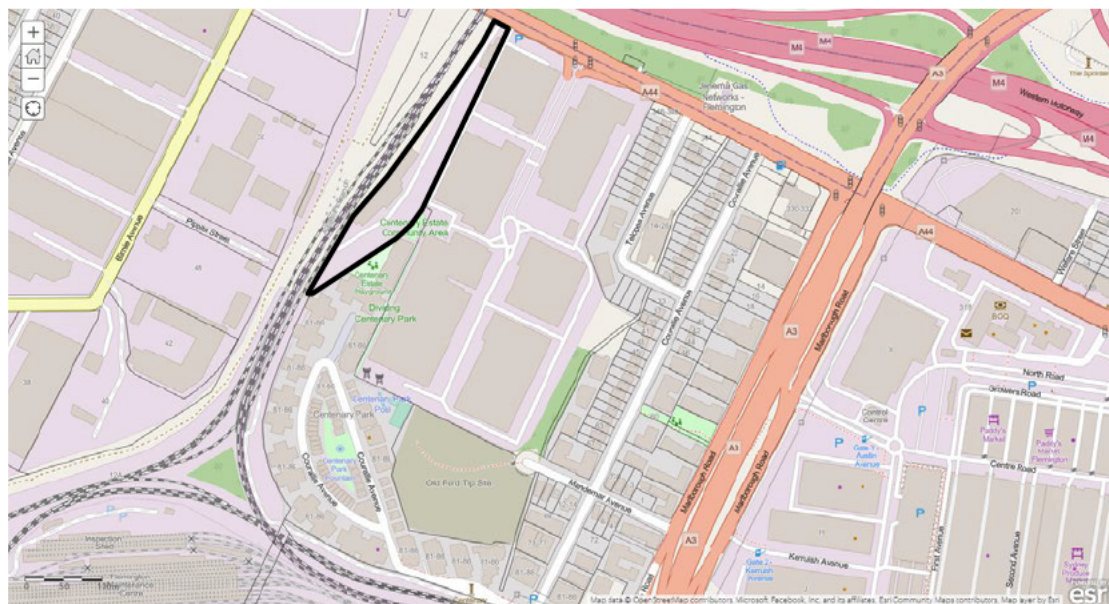


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

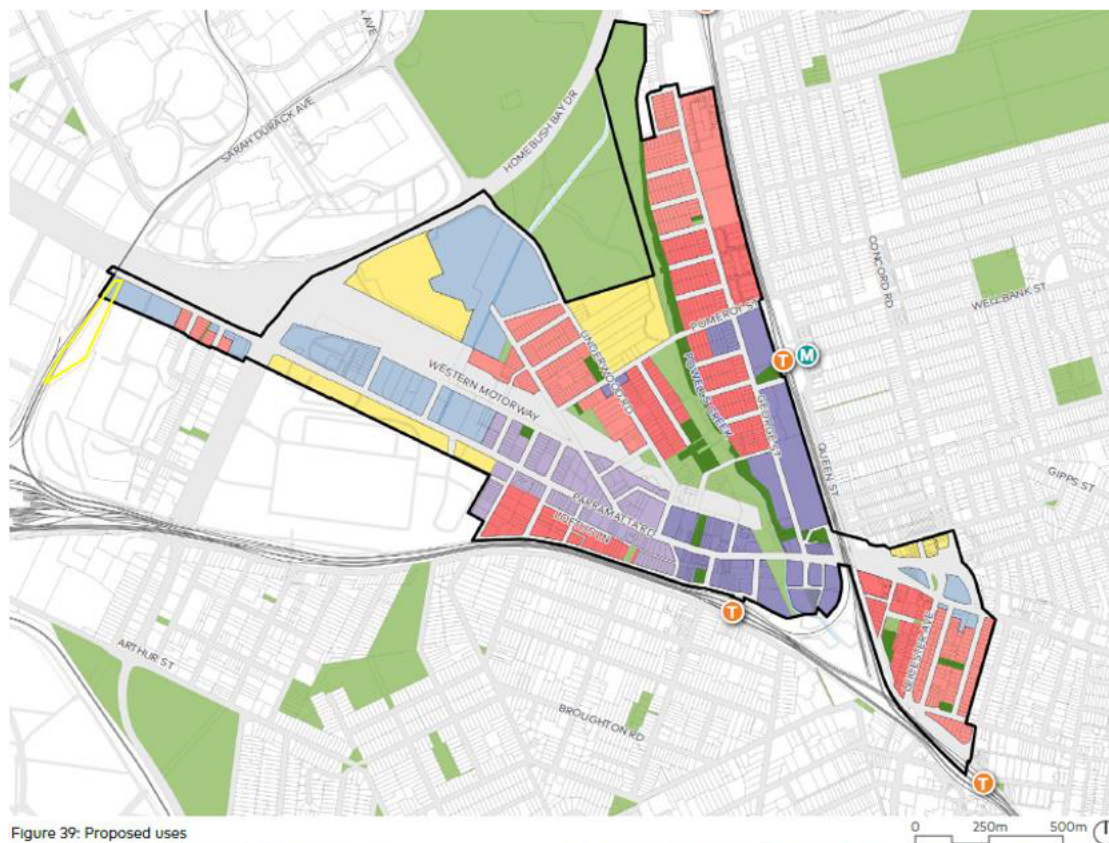


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.





## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

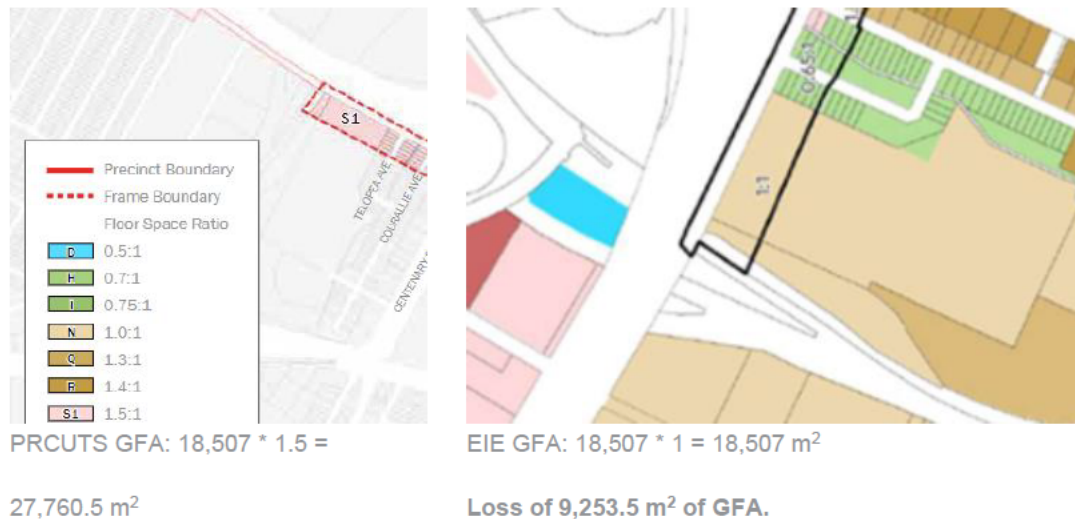


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)



with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
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## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**





This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

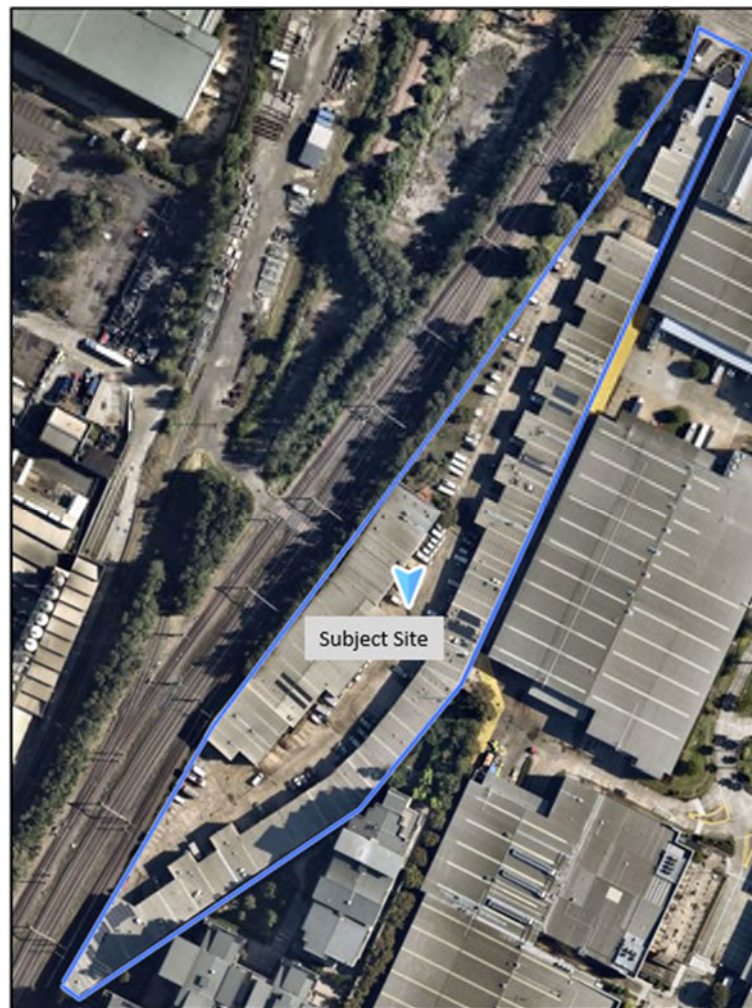


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

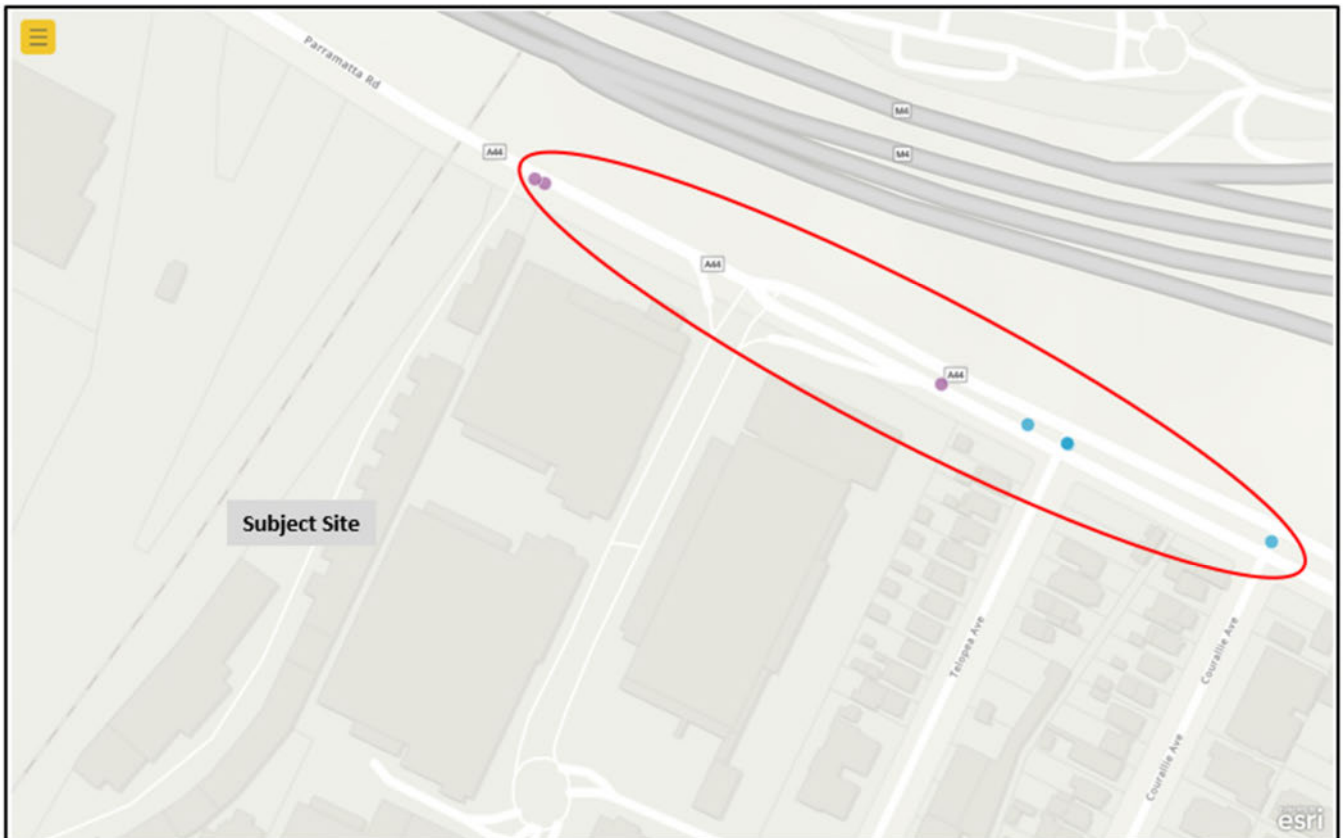


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

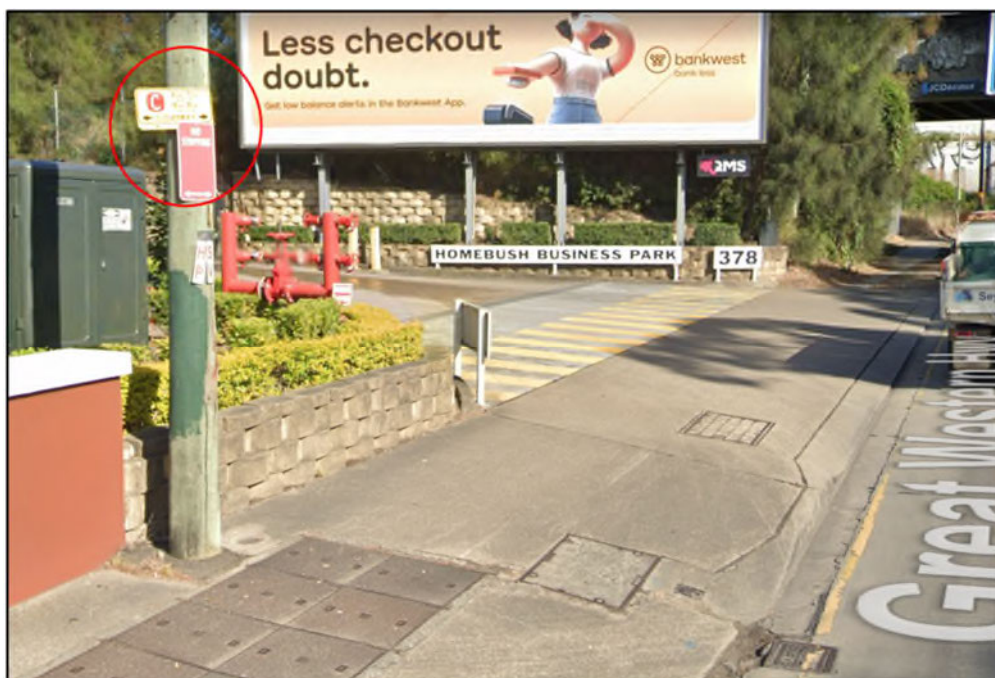


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

## 8 SUMMARY

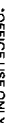
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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.



**Plan Drawing only to appear in this section**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 11:15:12 PM  
**Attachments:** [submission-to-nsw-planning\\_sp60097.pdf](#)

---

Submitted on Sun, 25/08/2024 - 23:13

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

■

**Last name**

■

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

■

**Suburb/Town & Postcode**

Epping 2121

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning\\_sp60097.pdf](#) (1.3 MB)

**Submission**

I support to rezone the whole block of SP60097.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED] West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

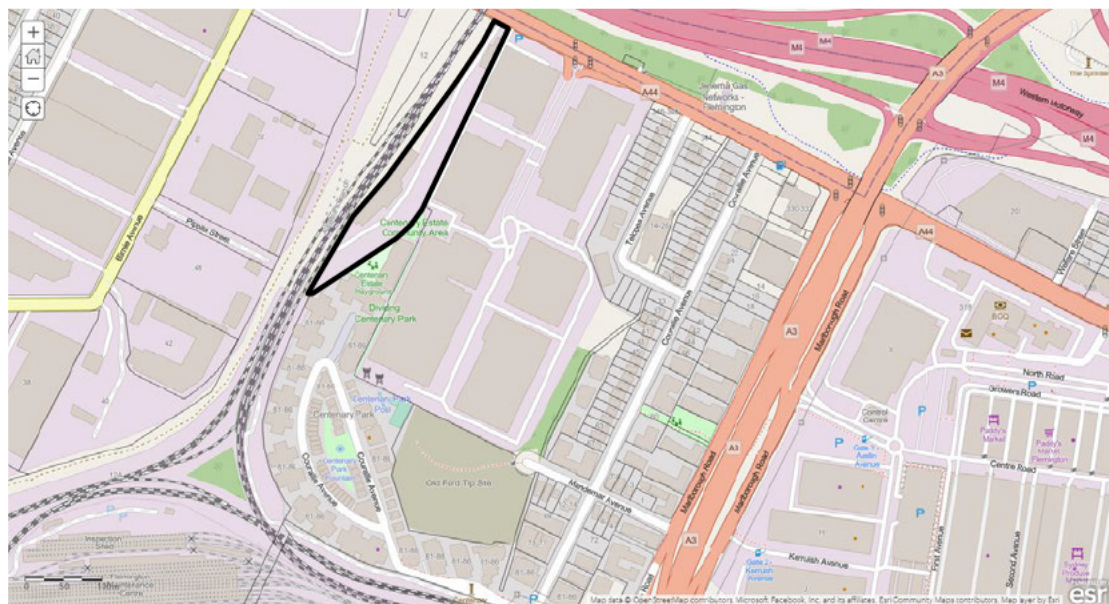


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

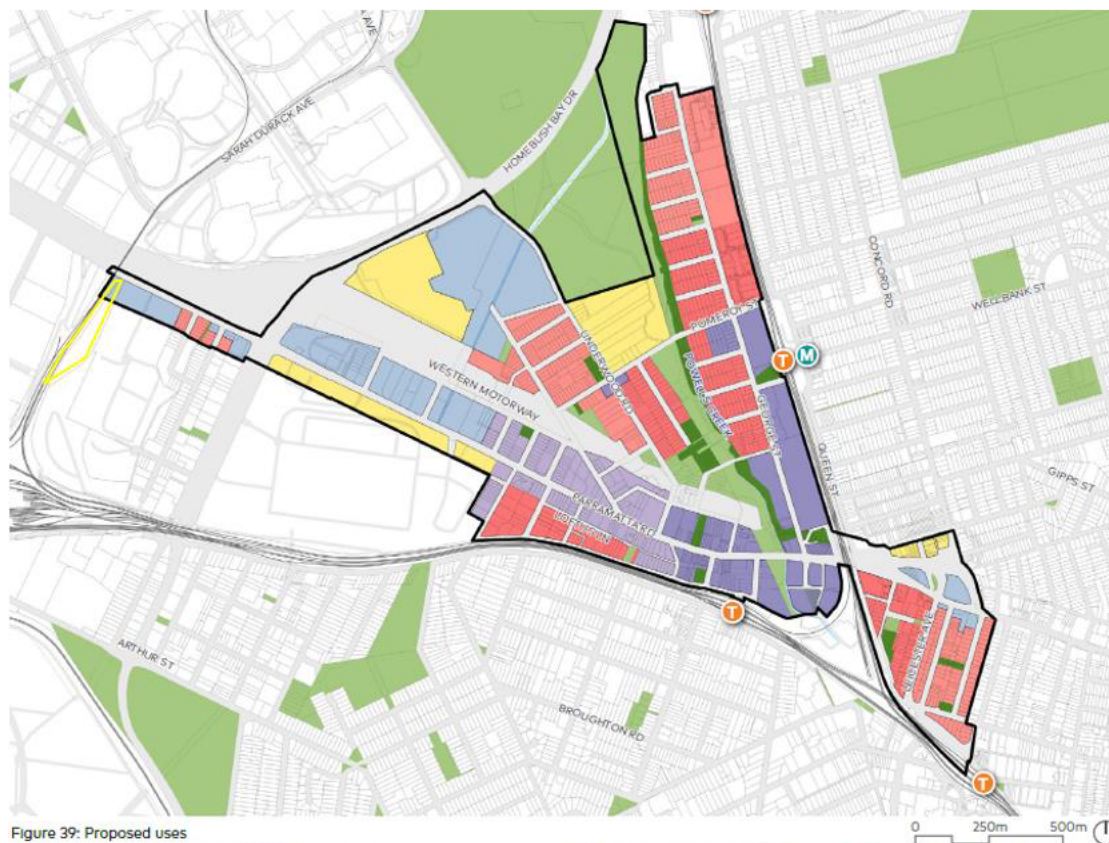


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.





## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓

<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓



As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

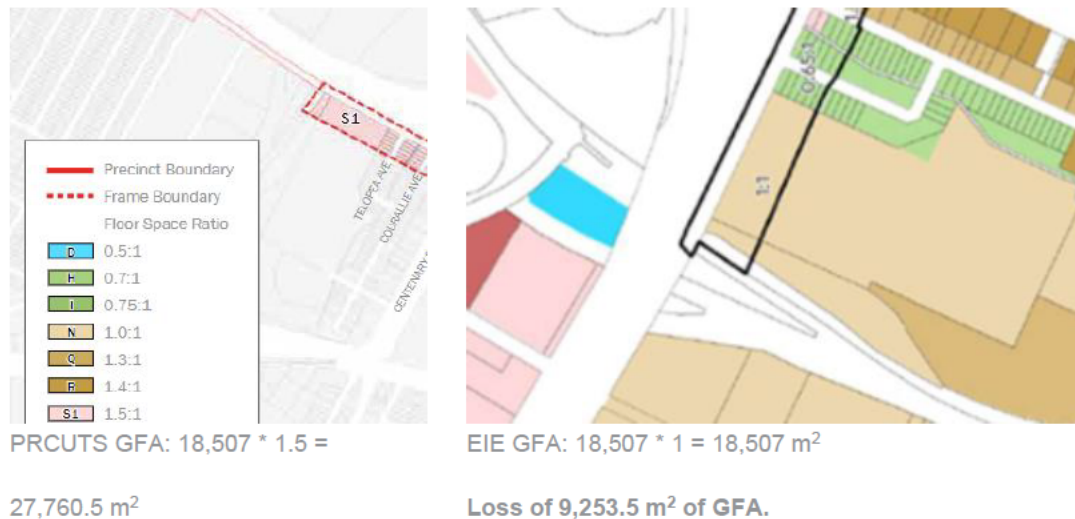


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**





This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy



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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

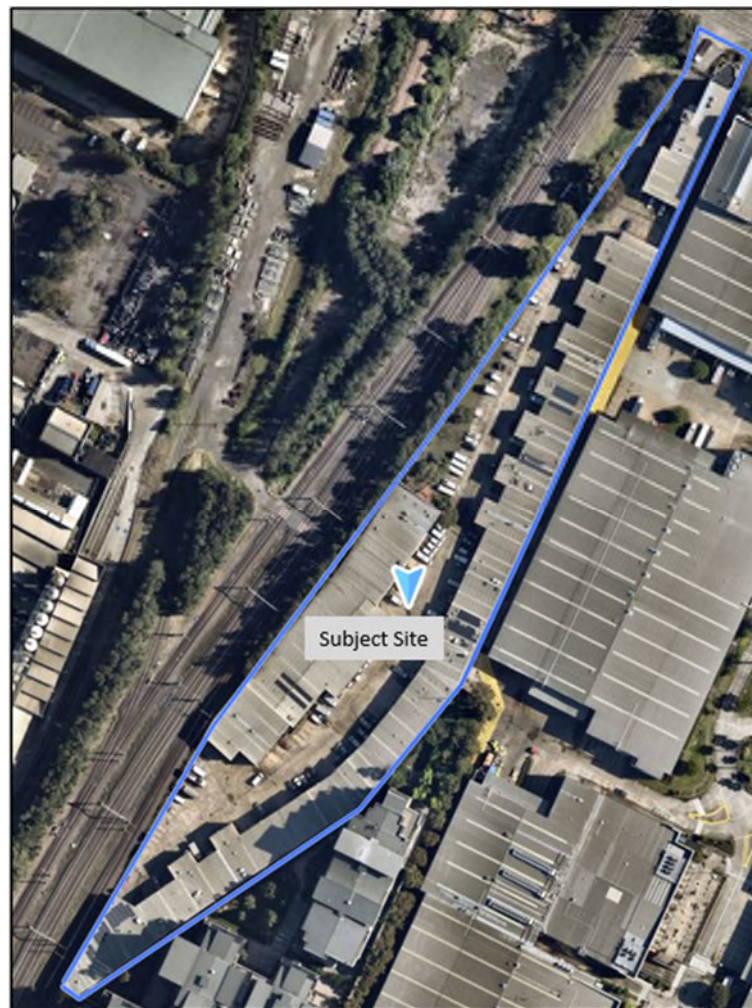


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

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#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

---

### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.



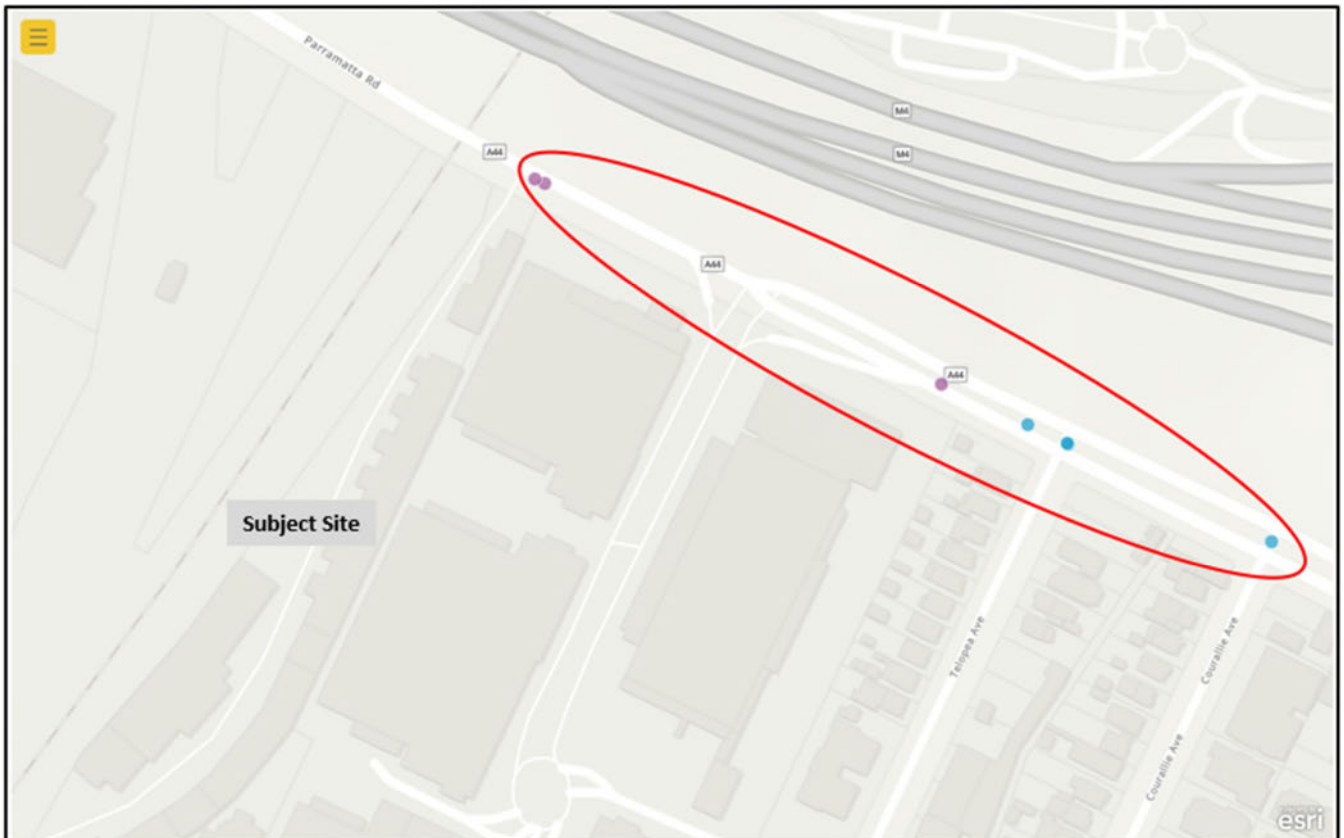


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

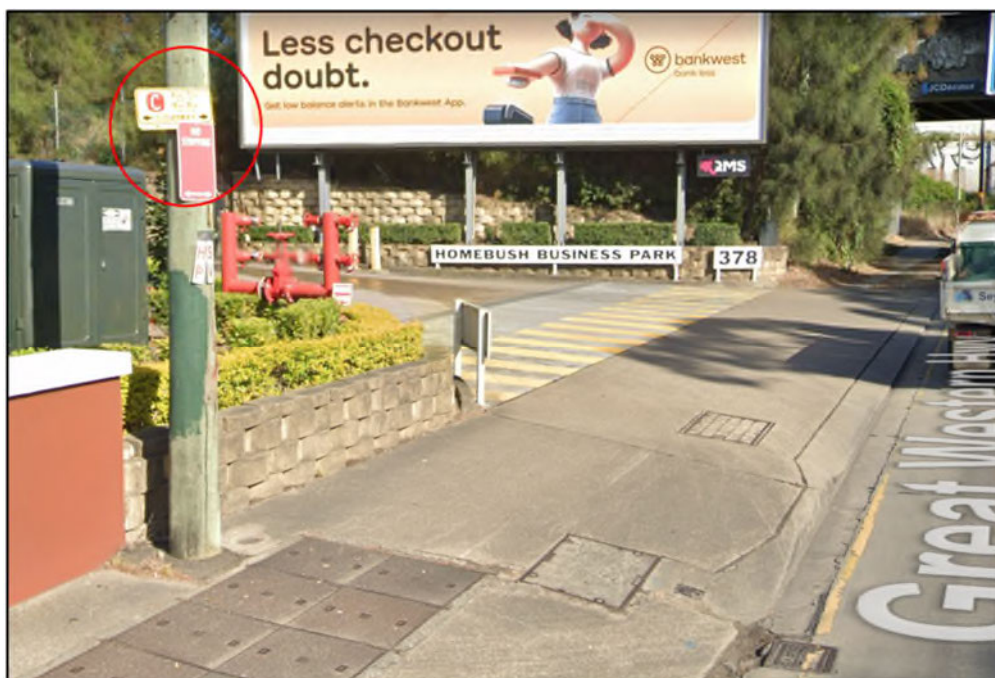


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial



Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				<b>65</b>	<b>63</b>
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.





**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 11:19:25 PM  
**Attachments:** [submission-to-nsw-planning\\_sp60097.pdf](#)

---

Submitted on Sun, 25/08/2024 - 23:17

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

██

**Suburb/Town & Postcode**

Homebush West 2140

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning\\_sp60097.pdf](#) (1.3 MB)

**Submission**

I support to rezone the whole block of the industry block 378 Parramatta Road, Homebush West.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

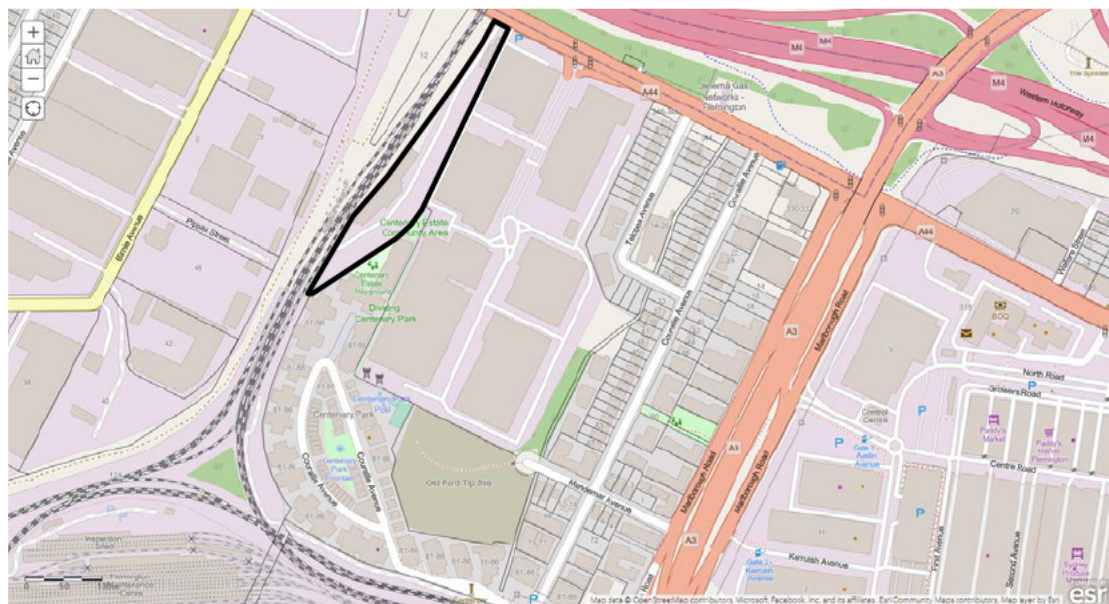


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

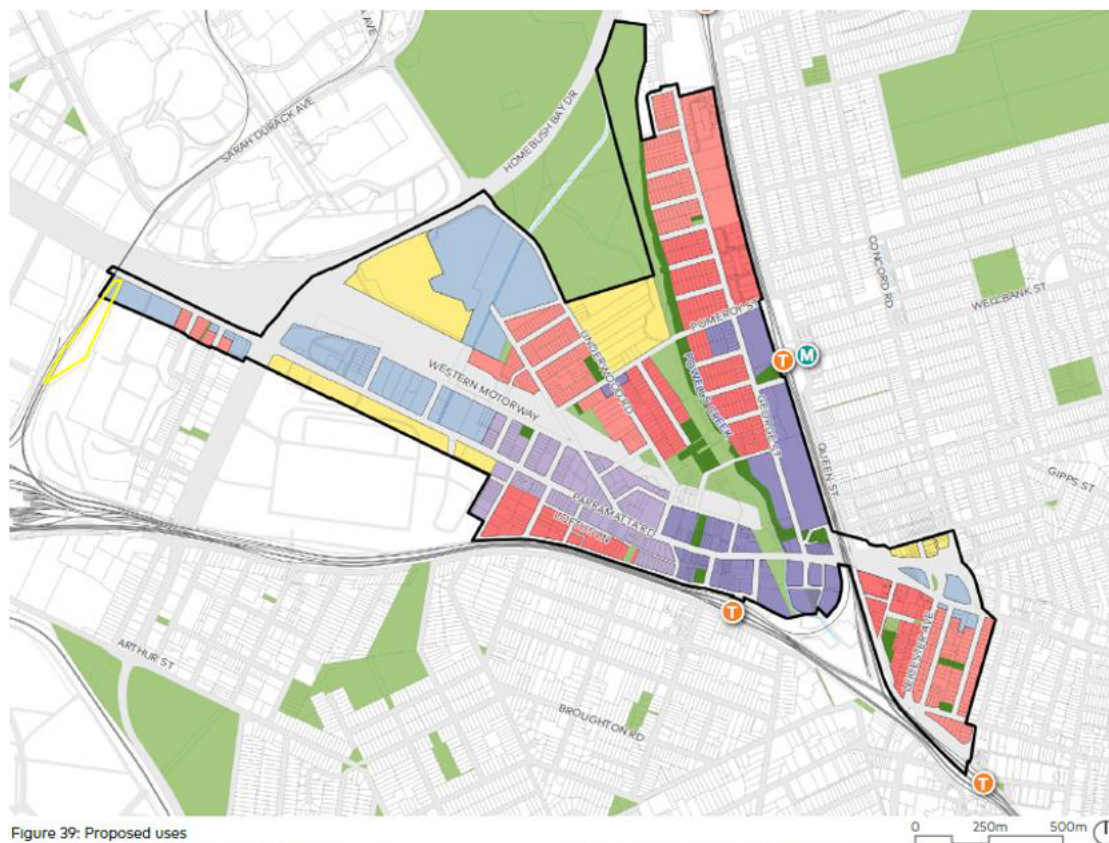


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.

## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )



## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

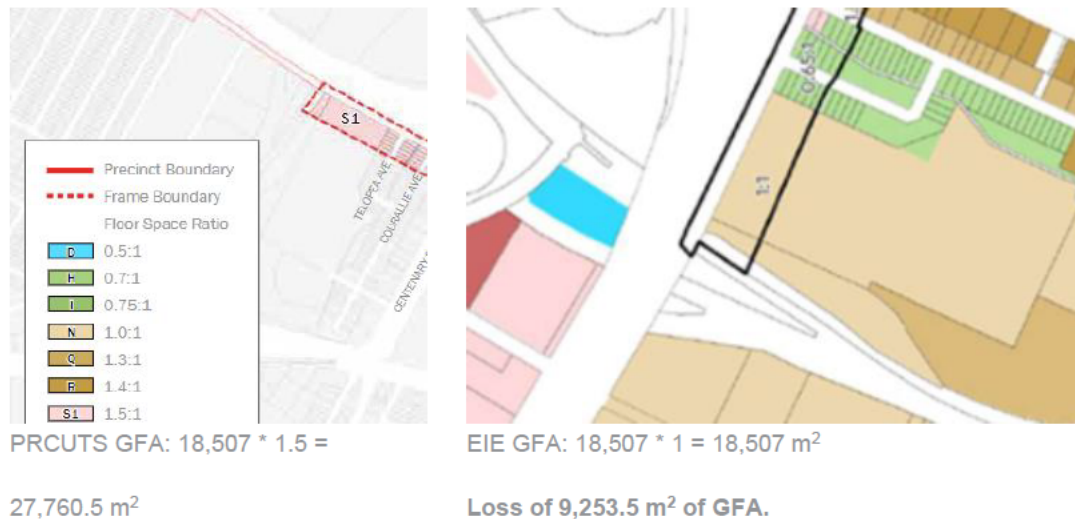


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy



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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

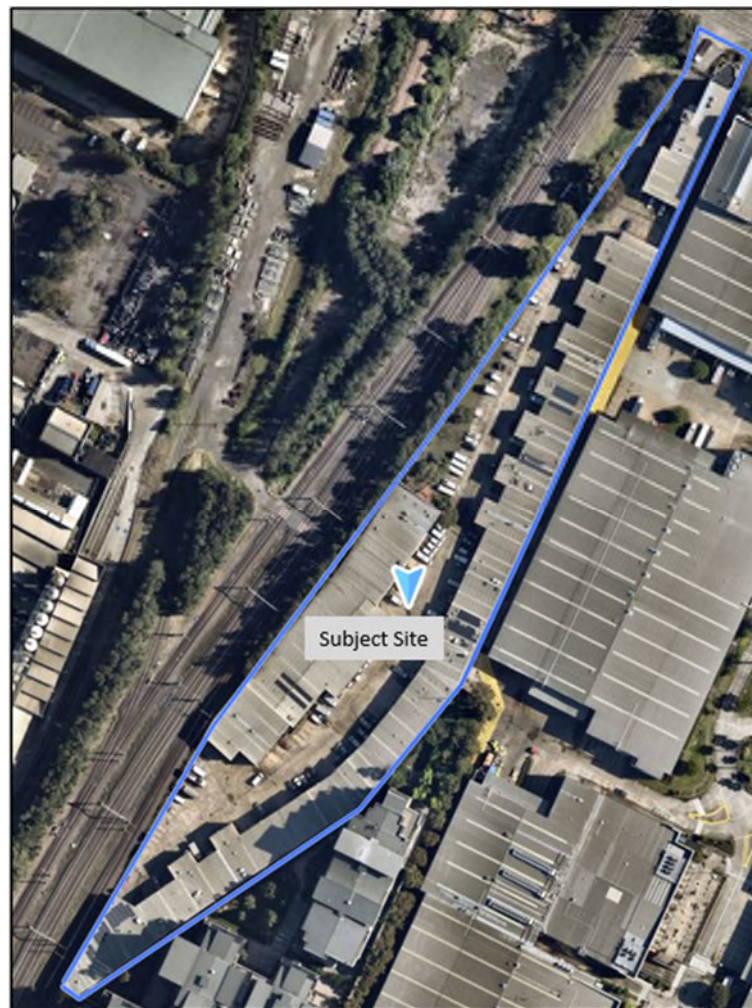


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

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#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

---

### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

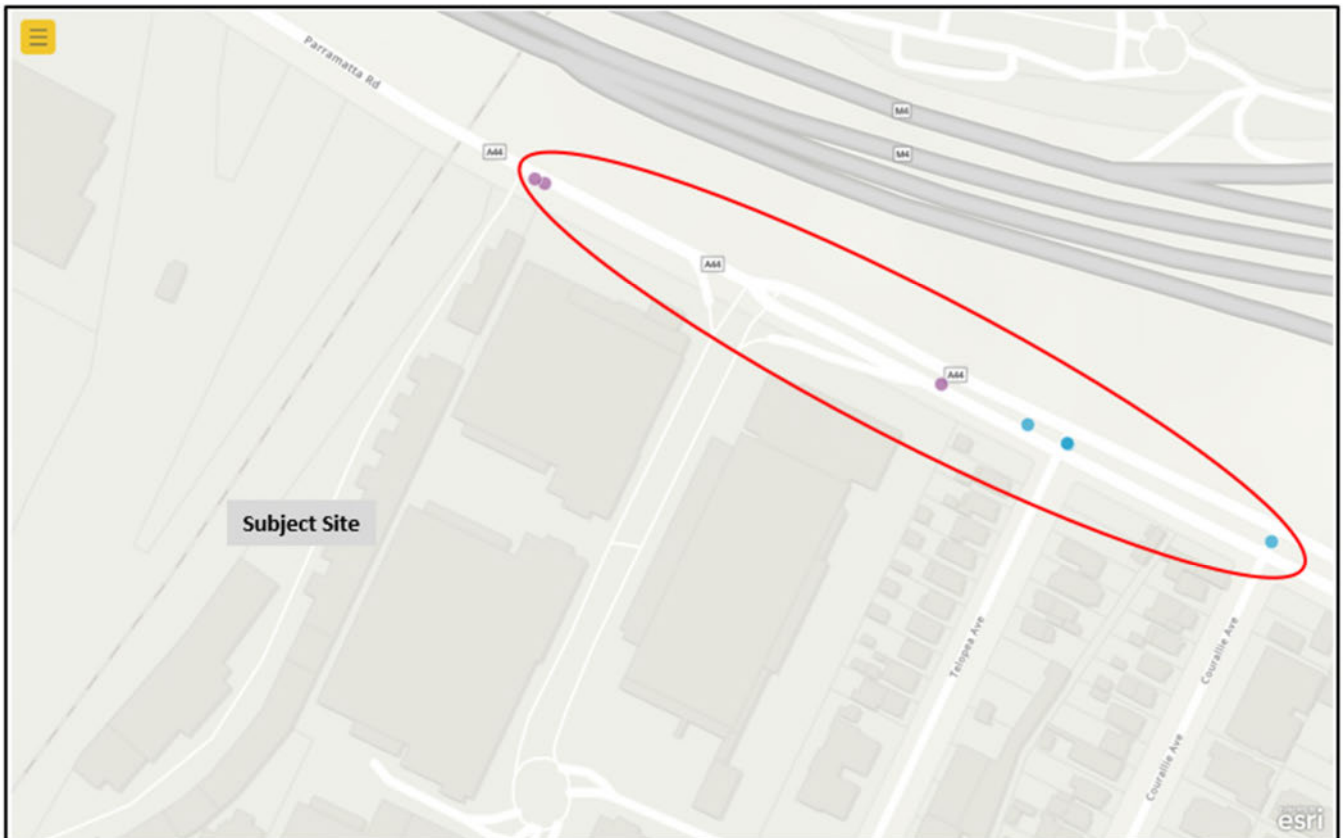


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

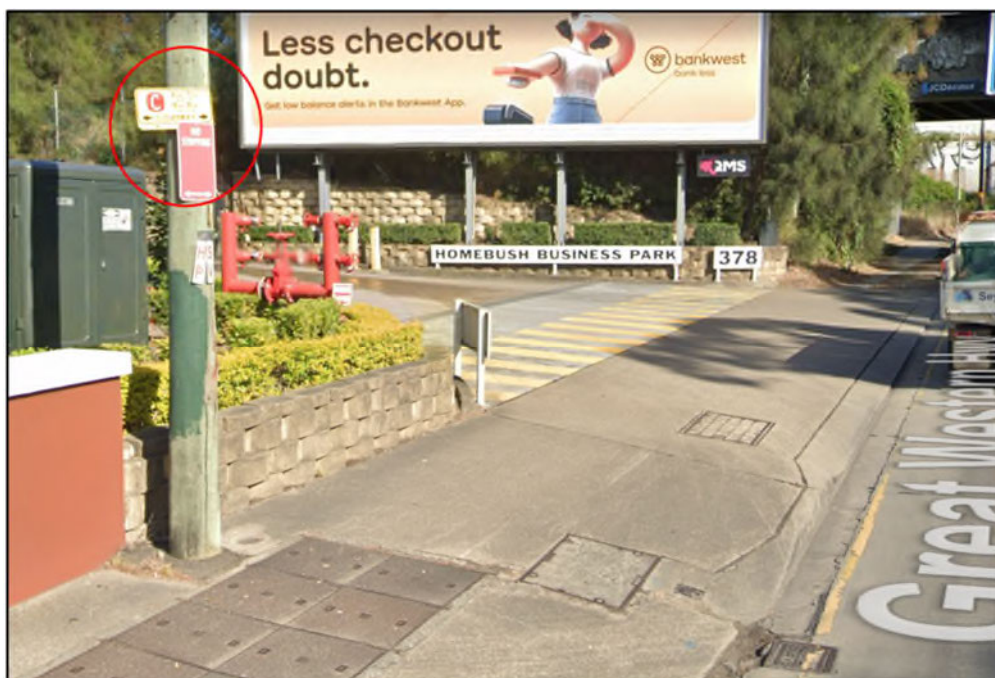


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.



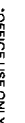
## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

**- Plan Drawing only to appear in this section**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Sunday, 25 August 2024 11:58:31 PM  
**Attachments:** [homebush-tod---resident-submission---34-40-ismay-avenue-site---30-august-2024---signed.pdf](#)

---

Submitted on Sun, 25/08/2024 - 23:49

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am submitting on behalf of my organisation

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I support it

**Submission file**

[homebush-tod---resident-submission---34-40-ismay-avenue-site---30-august-2024---signed.pdf](#) (5.31 MB)

### Submission

Please see attached submission on behalf of the Ismay Avenue Site resident group, constituting the lot owners [REDACTED] (a Key Site as designated in the Explanation of Intended Effect for the Homebush Transport Oriented Development Precinct).

If possible, we ask that you please redact page 42 of the submission (containing names and signatures of the resident group) prior to making this submission available for public consumption.

Thank you for taking the time to consider our submission. We welcome the opportunity to speak with you regarding our submission, and look forward to working with you.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 11:38:50 AM  
**Attachments:** [submission-to-nsw-planning-\(1.pdf\)](#)

---

Submitted on Mon, 26/08/2024 - 11:25

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2076

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning-\(1.pdf\)](#) (1.3 MB)

**Submission**

Please see attached document

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED] West 2140



22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

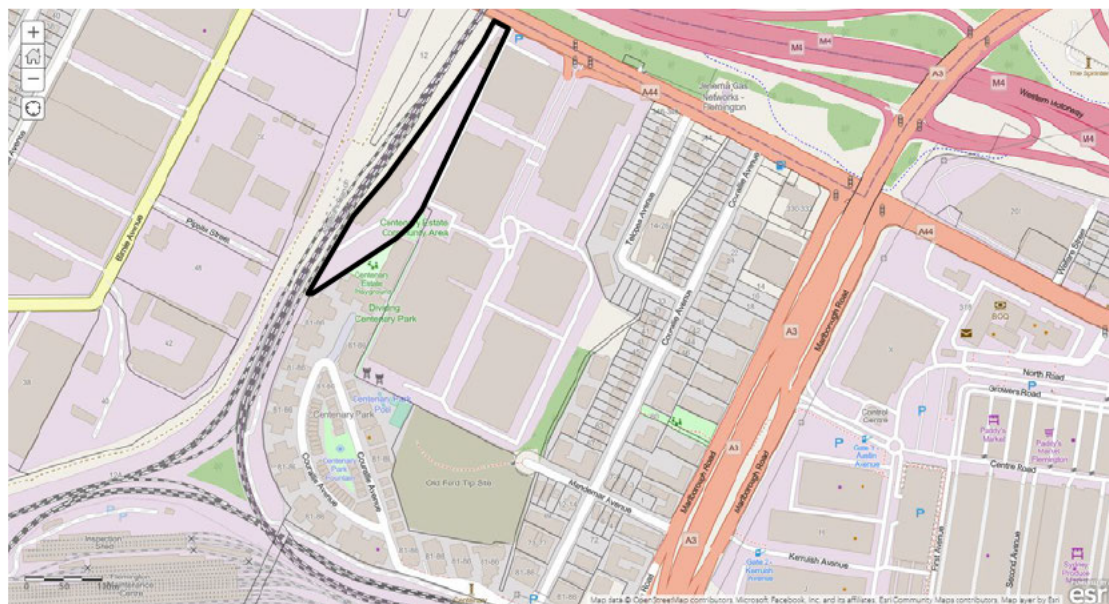


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

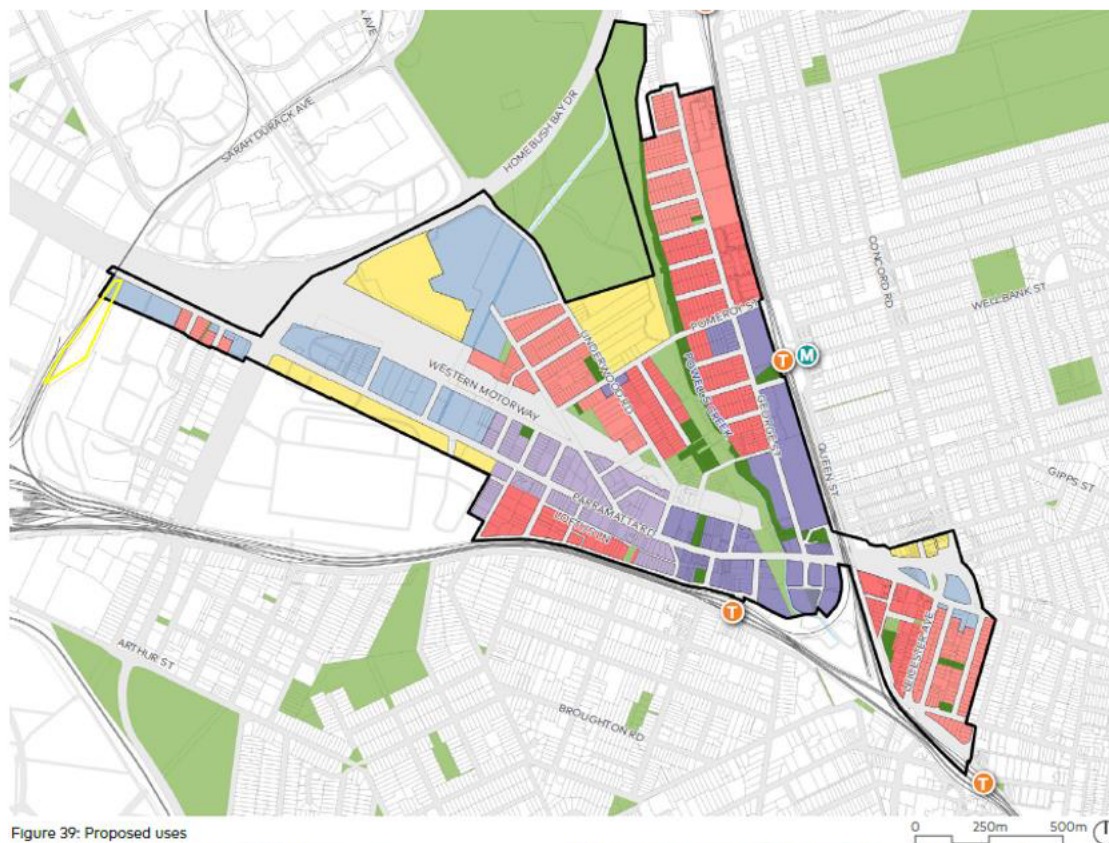


Figure 39: Proposed uses

- |                     |   |                                |                              |
|---------------------|---|--------------------------------|------------------------------|
| ■ Precinct Boundary | ■ Existing Open Space                         | ■ Special Activities + Markets | ■ Higher Density Residential |
| ● Metro Station     | ■ Proposed Open Space and Road network        | ■ Higher Density Mixed Use     | ■ Medium Density Residential |
| ● Train Station     | ■ Productivity Support and General Industrial | ■ Medium Density Mixed Use     |                              |

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
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## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

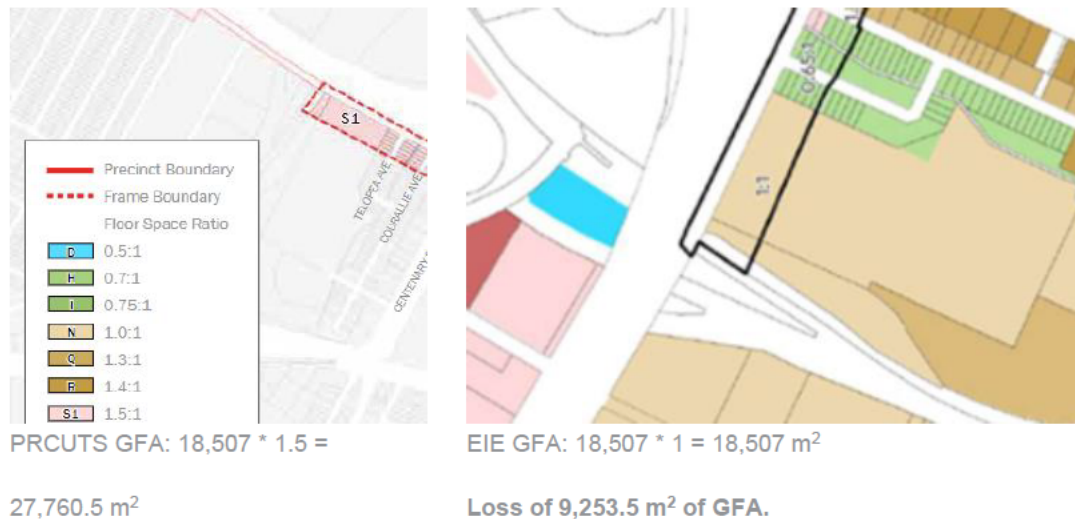


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.



Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth
- enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - o Retain the 1.5:1 as per PRCUTS
  - o Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - o Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - o Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

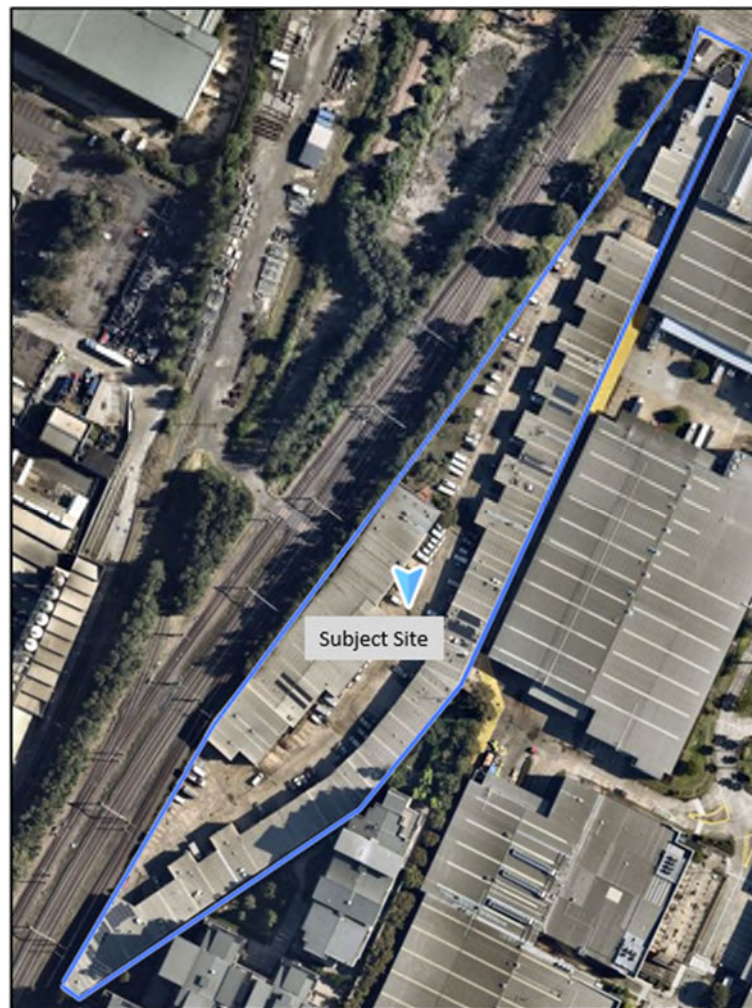


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

---

### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.



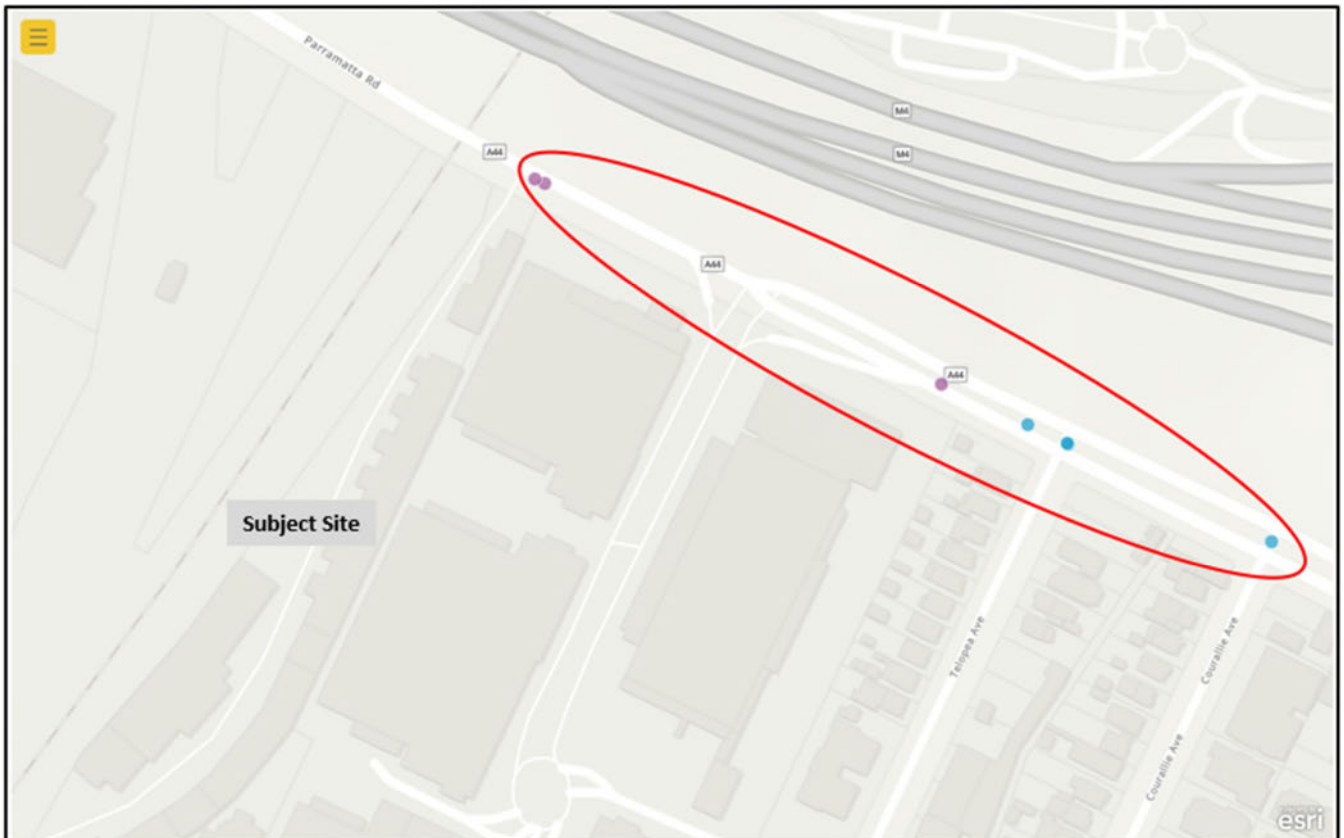


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

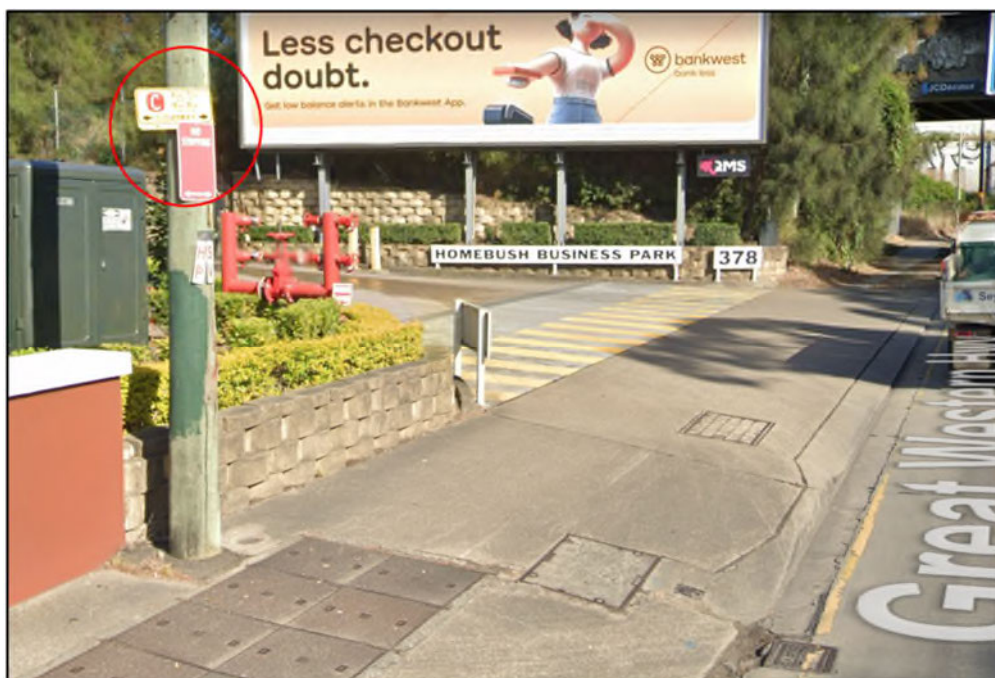


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial



Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				<b>65</b>	<b>63</b>
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

## 8 SUMMARY

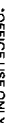
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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.



**- Plan Drawing only to appear in this section**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 11:40:29 AM  
**Attachments:** [submission-to-nsw-planning-\(1.pdf\)](#)

---

Submitted on Mon, 26/08/2024 - 11:39

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am submitting on behalf of my organisation

## Name

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

██

**Suburb/Town & Postcode**

2140

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning-\(1.pdf\)](#) (1.3 MB)

**Submission**

Please see attached document

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

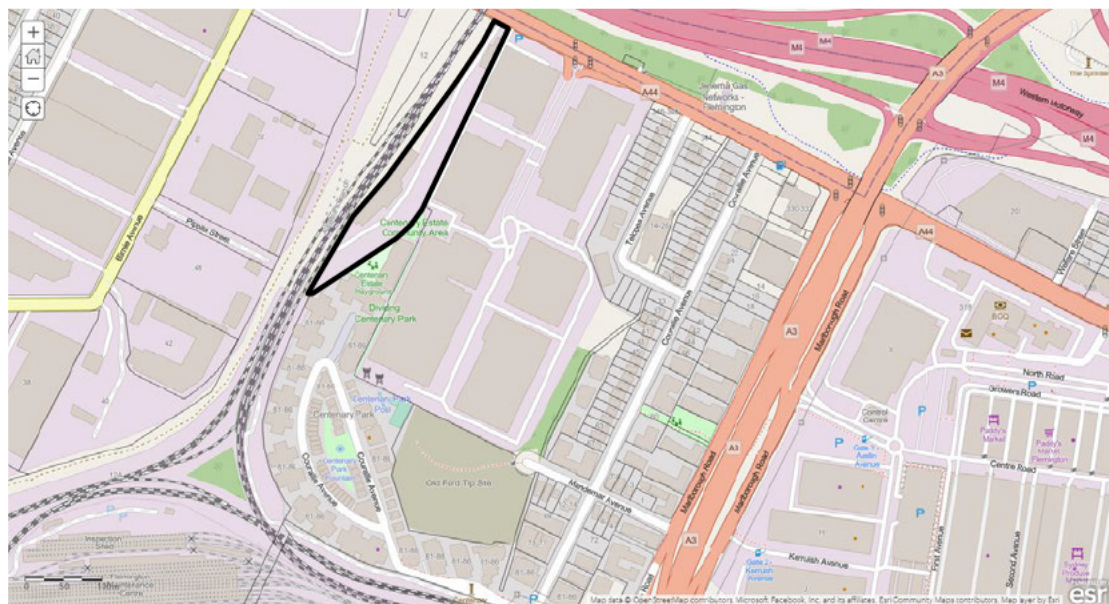


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

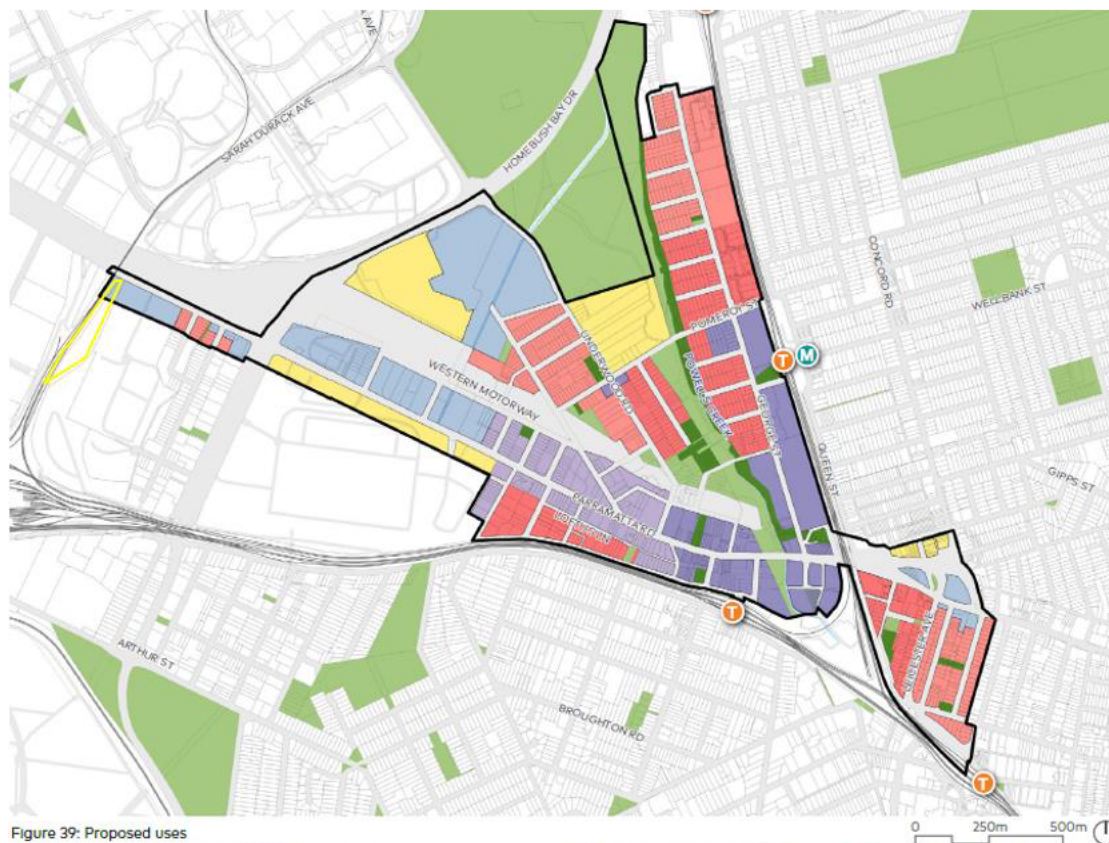


Figure 39: Proposed uses

- |                     |   |                                |                              |
|---------------------|---|--------------------------------|------------------------------|
| ■ Precinct Boundary | ■ Existing Open Space                         | ■ Special Activities + Markets | ■ Higher Density Residential |
| ● Metro Station     | ■ Proposed Open Space and Road network        | ■ Higher Density Mixed Use     | ■ Medium Density Residential |
| ● Train Station     | ■ Productivity Support and General Industrial | ■ Medium Density Mixed Use     |                              |

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.





## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
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## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

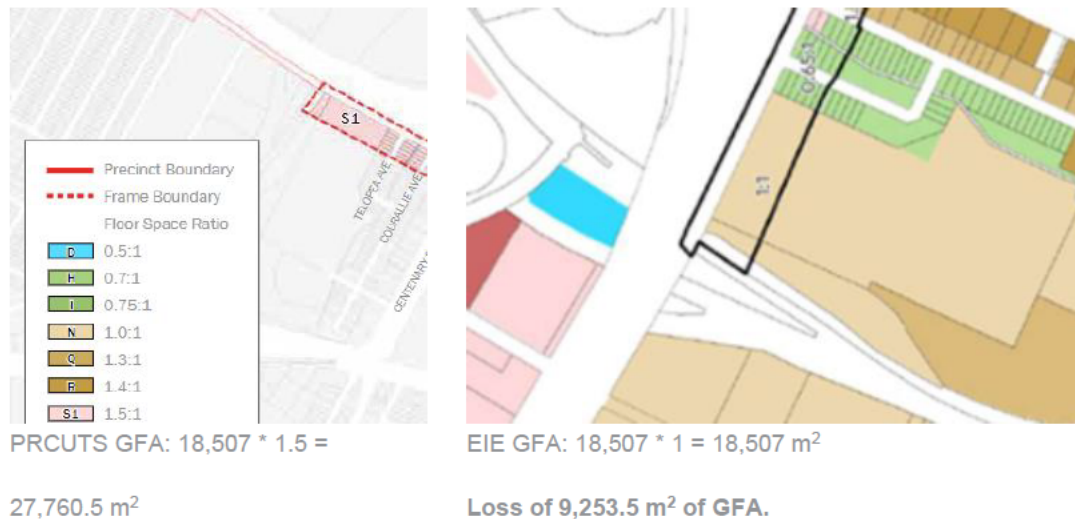


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)



with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
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## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

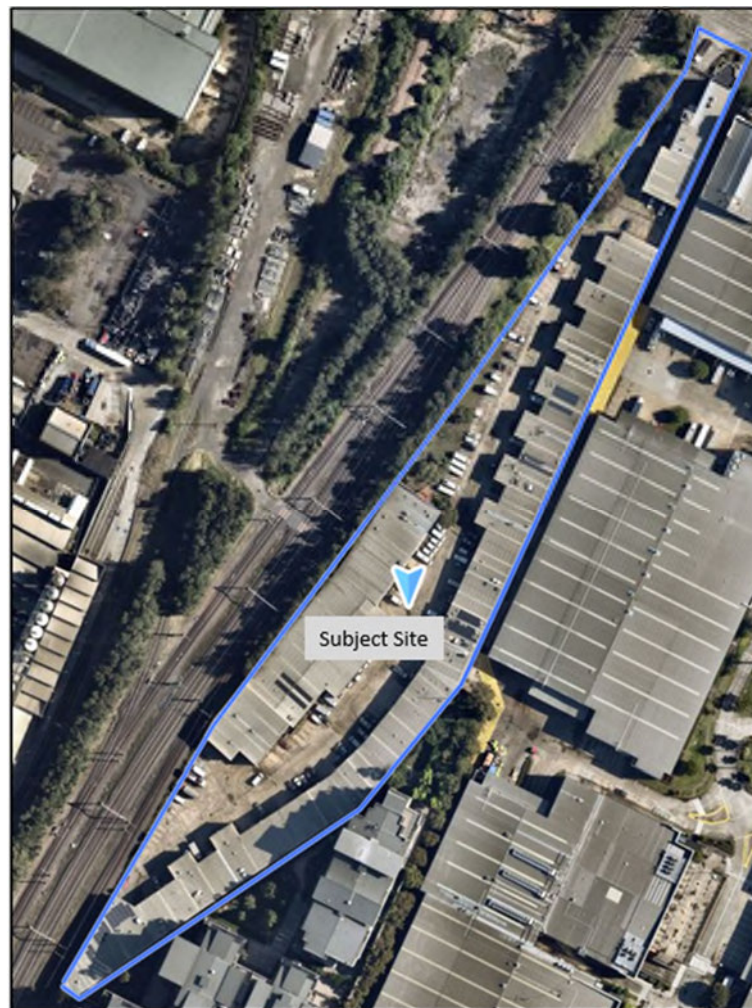


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.



## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

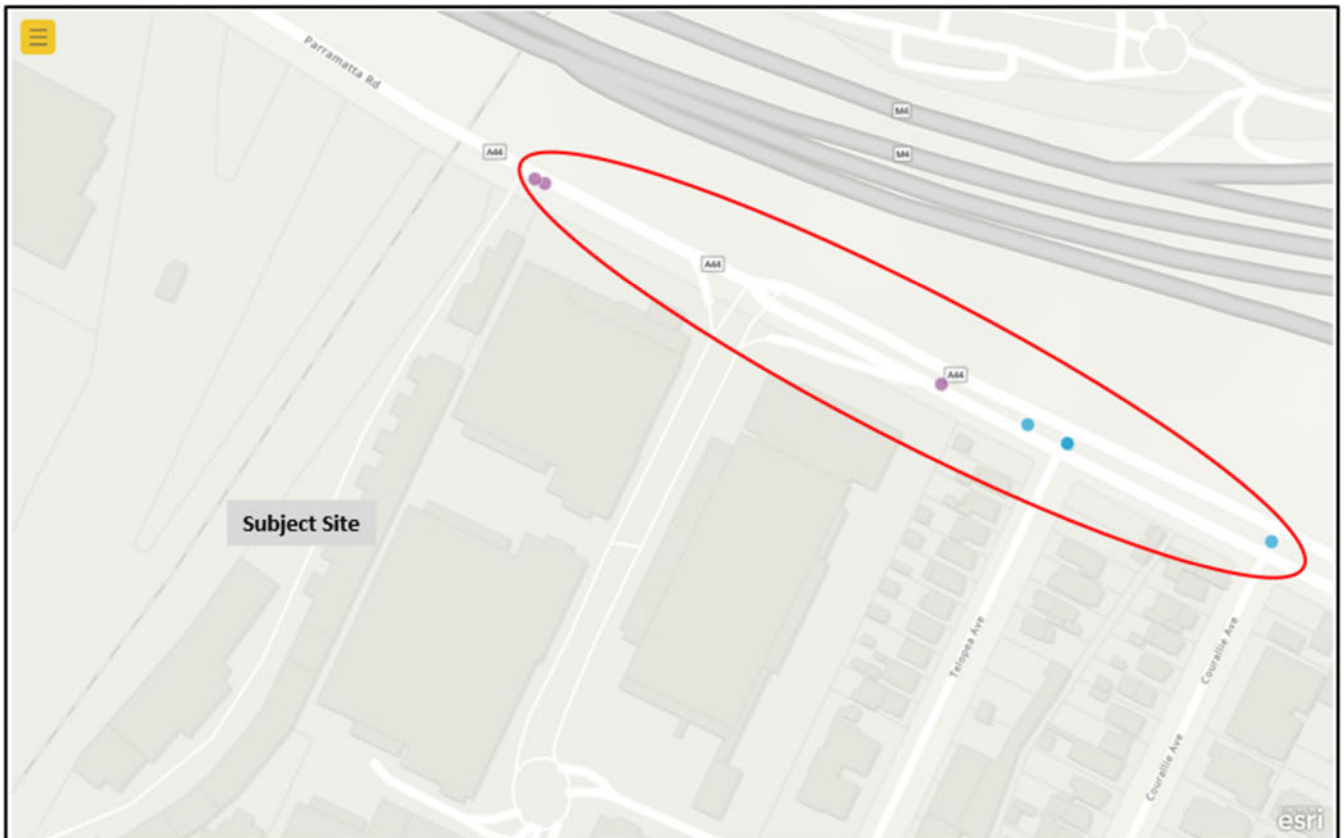


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

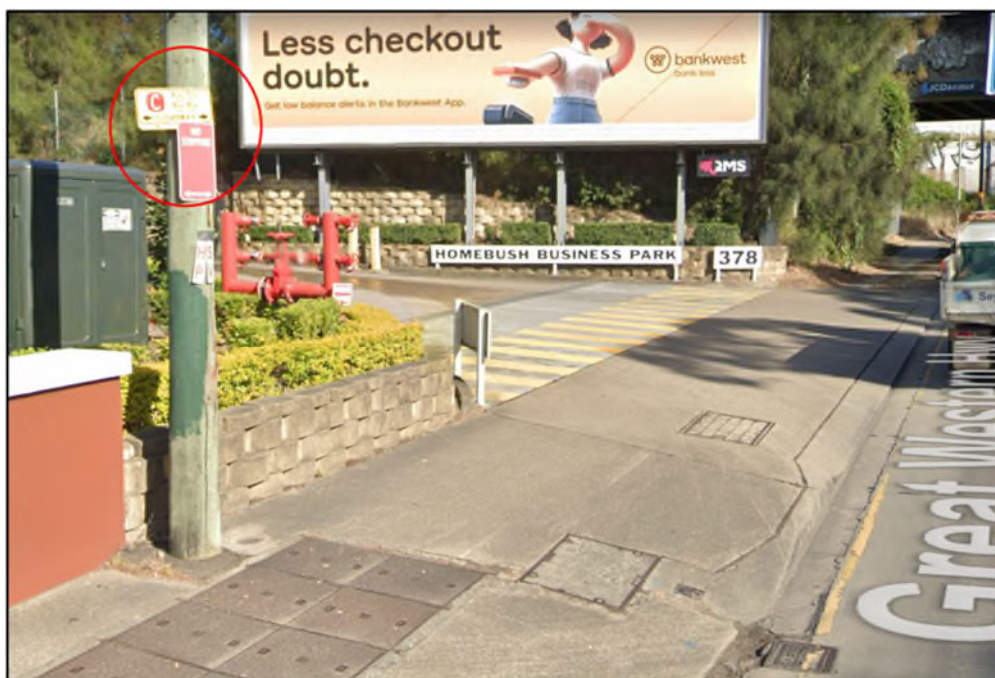


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.



Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 12:06:30 PM  
**Attachments:** [24-08---4-6-loftus-cres,-homebush-tod-rezoning-submission.pdf](#)

---

Submitted on Mon, 26/08/2024 - 12:02

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Ben

### **Last name**

CREIGHTON

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Parramatta 2150

### **Please provide your view on the project**

I am just providing comments

### **Submission file**

[24-08---4-6-loftus-cres,-homebush-tod-rezoning-submission.pdf](#) (805.99 KB)

### **Submission**

Please find attached a submission on behalf of our client.

### **I agree to the above statement**

Yes

26 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### 4-6 LOFTUS CRESCENT, HOMEBUSH

I refer to the above subject matter which is on public exhibition until 30 August 2024.

Think Planners have prepared this submission on behalf of Astute Property regarding the above-mentioned address and shown in Figure 1 for context. This area is consistently referred to as “the subject land” throughout this submission.



Figure 1: The subject land in its immediate context is highlighted above (Source: Benson McCormack Architecture)

Contextually, the subject land has the following relationships:

- North: A residential flat building known as the Summit Apartments and also the Horse and Jockey Hotel.

An accessway is located along the rear boundary which provides ingress and egress to garages on the subject land. This access laneway provides connection to Knight Street to the west.

- South: Loftus Crescent, with a pedestrian crossing providing direct access to Homebush Train Station, approximately 20m walking distance from the site boundary.



- East: Residential housing between 1 and 3 storeys, including older style low rise apartment buildings and a single storey structure of local heritage significance on the corner of Loftus Crescent and Station Street.
- West: Detached residential housing and a low rise apartment building of two storeys

As shown in Figure 2 below, the subject land is ideally located to provide additional housing adjacent to the Homebush Train Station. It is unconstrained with no heritage items or strata holdings that would make redevelopment more difficult. This submission supports the overarching theme and desire of the EIE which is to increase housing within accessible locations.

Our review of the Explanation of Intended Effects (EIE) has highlighted that there is a missed opportunity to deliver more housing over the subject land than currently envisioned, noting that other sites constrained by heritage values have taller buildings proposed. We specifically note for example that the key site adjacent to the subject land has a heritage item, which is a constraint to future development, despite what the map below shows.

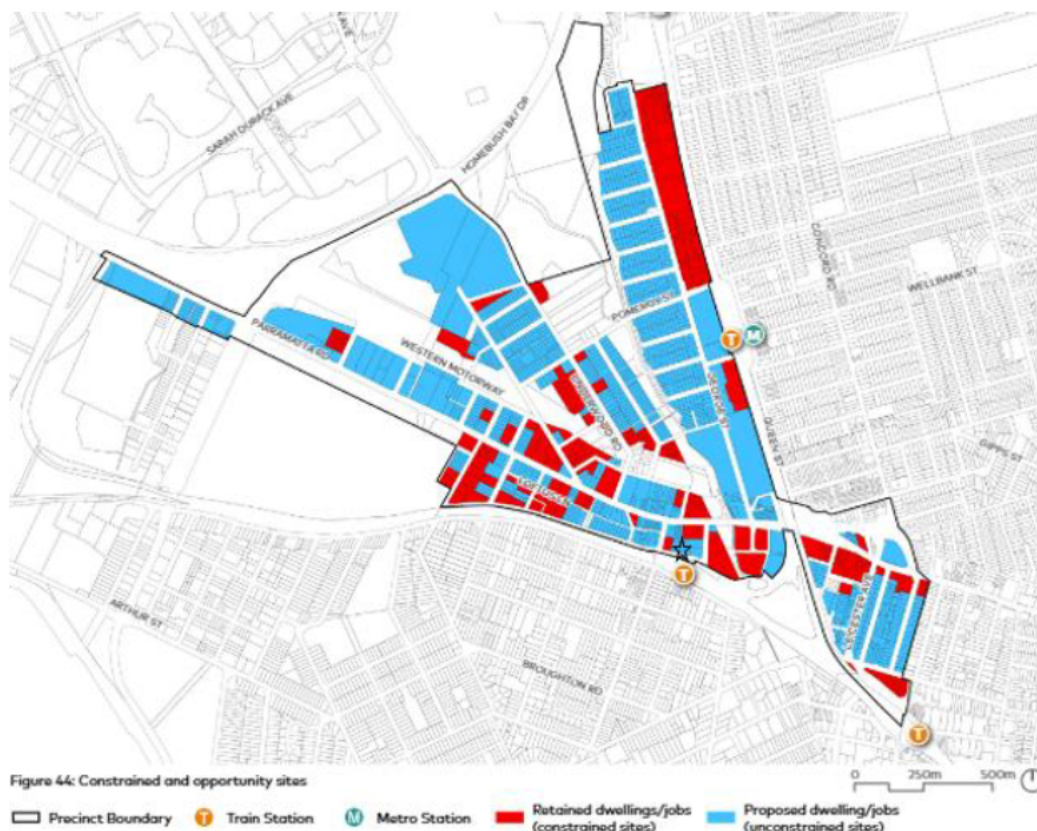


Figure 2: The site (identified by star) is ideally located next to Homebush Train Station and within an area identified as an unconstrained site. (Source: Urban Design Framework )

## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have four (4) objectives to deliver high and mid-rise housing within 1,200 m of eight (8) transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is adjacent to the Homebush train station.</p> <p>The subject land is well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being adjacent to the Homebush Metro Station.</p> <p>The site is a significant area that can accommodate housing and commercial uses as per the proposed MU1 Mixed Use Zoning proposed.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support more housing within close proximity to Homebush Station, services and entertainment offerings within the Town Centre.</p>	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	<p>The subject land can contribute to affordable housing supply.</p>	✓

## REZONING PROPOSAL OBJECTIVES

The Department published EIE clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives for the Homebush Precinct EIE. These are discussed below.

Objective	Response	Consistent
• <i>increase housing supply in the Precinct</i>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
• <i>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</i>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
• <i>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</i>	The subject land with amendments made to the strategy, can contribute to a streamlined planning approach that delivers more housing faster.	✓
• <i>increase the amount of affordable housing in the Precinct</i>	The subject land can contribute to affordable housing supply.	✓
• <i>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</i>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal and is identified in the Urban Design Study as unconstrained land, the actual housing capacity of the site should be realised, rather than being constrained as it currently is.

## NOTABLE SITE CHARACTERISTICS

The land, the subject of this submission has several unique characteristics that warrant additional detailed consideration and provides an excellent opportunity to contribute to employment and housing supply in the Homebush Precinct. Notable characteristics comprise:

1. The subject land is adjacent to the Homebush Train Station, with dimensions and area that can comfortably accommodate a taller building.



2. The subject land is characterised by three modest detached dwellings, owned by the Astute Property, meaning that development can occur now and be a catalyst for further development in the precinct.
3. The land at its nearest point is about 20m from the Homebush Train Station entrance, making its accessibility excellent.



Figure 3: The site is ideally located next to Homebush Train Station within a 20m walking distance. (Source: Urban Design Framework )

4. The land is ideal for innovative planning controls that deliver on the aspirations of both employment and housing, ideally located proximate to the train station, and with unique characteristics for both workers and residents.
5. The land is in a precinct where the emerging character is of tall slender towers that contain mixed use activities within. Accordingly, the proposal accords with the character of built form in TOD precincts and should have higher height given its proximity to the train station.
6. Importantly for this submission, the land enjoys incredible opportunity for workers and residents to benefit from views and also benefit from its location near the town centre and open spaces.

## UNCONSTRAINED BY HERITAGE, STRATA OR OTHER HAZARDS

The subject land is currently occupied by three detached cottages, with the site having regular proportions and dimensions, and area of approximately 1,593.3 m<sup>2</sup>.

When investigating the Homebush Precinct, Cox Architecture rightly prepared a constraints analysis which then informed where density could be located throughout the

precinct. This mapping identified recent development, heritage, strata holdings and other items as constraints for future development and is shown in Figure 4 below.



Figure 31: Constraints Map

Figure 4: Combined constraints map (Source: Urban Design Report)

As can be clearly seen in Figure 4, the subject land has no constraints and is therefore very suitable for additional height above that proposed within the EIE. This is notable as the neighbouring site is constrained by heritage values, with higher height then applied.

Our client does not seek to remove proposed 103m height from the neighbouring site, recognising that design solutions exist to deliver this. However a more reasonable approach to height is advocated which reflects the subject lands (1) unconstrained nature, (2) size and ability to deliver housing and (3) proximity to the train station and town centre.

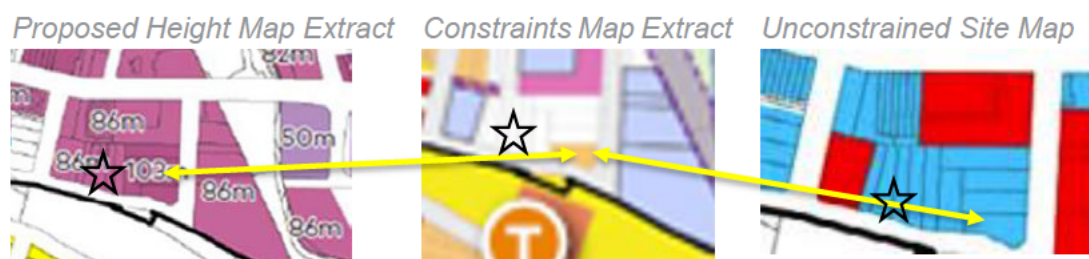


Figure 5 The height map and unconstrained site map contradict the constraints map which identifies heritage on the corner. There are no constraints on the subject land (Source: EIE, Urban Design Report)

Given the above and the unconstrained nature of the subject site, this submission recommends that the height over the subject land be increased to 103m, which is consistent with the neighbouring site to the east.







As shown in Figure 6, there is no rational reason for a difference in height, from an urban design perspective. There would simply be a minor emphasis of a building setback deep within a future corner block. A better approach would be to emphasise the block itself through a consistent height that achieves three 30 storey towers, rather than a single tower of 30 storeys. This approach will emphasise the corner block close to the train station, rather than a single corner in an underwhelming manner, when considered with the insignificant height difference between a 24 storey tower and 30 storey tower.

Furthermore, in elevation, the difference between 30 storeys and 24 storeys is visually unapparent, meaning it is unclear why there is a difference here as ADG requirements can be complied with. This height strategy over the block therefore only achieves one outcome: less housing, which is contrary to the objectives of the TOD program and EIE.

A better approach is to have consistency across the block with a 30 storey height limit applied. This will achieve more housing in an accessible location, making a valuable contribution to housing choice, diversity and importantly, affordability.

It is recommended that:

- The height of buildings be amended to increase the maximum height to 103m.

## BLOCK CONFIGURATION, SITE PLANNING AND AMALGAMATION

Our client recognises that it is important and necessary to make genuine attempts to purchase adjacent land. However, we are concerned that Part 4.6.1 (8) of the Draft Homebush Precinct Design Guide is both impractical and unreasonable. The guideline states:

- *Council will require appropriate documentary evidence to demonstrate that a genuine and reasonable attempt has been made to purchase an isolated site based on a fair market value. At least two (2) independent valuations (reports and valuations) must be undertaken within 3 months of the date of the development application (DA) lodgement are to be submitted as part of that evidence and these are to account for reasonable expenses likely to be incurred by the owner of the isolated site in the sale of the property.*

Given the extensive time taken to prepare a development application following the completion of the valuation exercise, *three months is not a realistic figure*. As the Department is aware, once the site area is confirmed there is extensive time requirements for matters such as survey of the land, consultant engagement, site investigations including water monitoring and geotechnical testing, preparation of consultant reports, pre lodgement meetings with Council for design development and then amendments, preparation of detailed plans, and lodgement procedures, then it is self-evident that a three month window is impractical. We would recommend that this be amended to 18 months from the date of the development application with the clause redrafted as follows:

- ... At least two (2) independent valuations (reports and valuations) must be undertaken within **18 months** of the date of the development application (DA) lodgement) are to be submitted as part of that evidence...

## RECOMMENDATIONS

The subject land presents a unique opportunity to increase housing supply within a highly accessible location adjacent to the Homebush Train Station. Accordingly, it is recommended that –

- The height be increased over the subject site from 86m to 103m.
- Guideline (8) within Part 4.6.1 of the Draft Homebush Precinct Design Guide be updated as follows:
- *Council will require appropriate documentary evidence to demonstrate that a genuine and reasonable attempt has been made to purchase an isolated site based on a fair market value. At least two (2) independent valuations (reports and valuations) must be undertaken within **18 months** of the date of the development application (DA) lodgement) are to be submitted as part of that evidence and these are to account for reasonable expenses likely to be incurred by the owner of the isolated site in the sale of the property.*

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct. Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

██████████  
██████████  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 12:33:35 PM  
**Attachments:** [378-parramatta-rd.pdf](#)

---

Submitted on Mon, 26/08/2024 - 12:32

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush West 2140

**Please provide your view on the project**

I object to it

**Submission file**

[378-parramatta-rd.pdf](#) (1.49 MB)

**Submission**

Consideration to rezone whole lot.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED] Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED]  
[REDACTED]

8/08/2024

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 1:09:34 PM

---

Submitted on Mon, 26/08/2024 - 13:09

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

████████████████████

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

### **Submission**

I fully support the proposal of rezoning from R3 to R4 for north side of Strathfield station .  
However , I do think those area around Cooper st within 400m of station proposed FSR  
2.5:1 should be increased to provide more housing to solve the housing shortage .

East side of Moseley st under Burwood council has a 9 storey building for the last 40 years  
, so is Everton Rd 9 storey building has already been built .

Thank you

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 1:17:51 PM

---

Submitted on Mon, 26/08/2024 - 13:17

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2140

**Please provide your view on the project**

I support it

**Submission**

I am owner of [REDACTED] I request to rezone whole land of our campus. Please see attachment for the reasons. Thank you

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 1:20:58 PM  
**Attachments:** [378-parramatta-rd.pdf](#)

---

Submitted on Mon, 26/08/2024 - 13:19

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2140

**Please provide your view on the project**

I object to it

**Submission file**

[378-parramatta-rd.pdf](#) (1.49 MB)

**Submission**

I am the owner of [REDACTED] Homebush West, I request to rezone the whole land of our campus. Please see attachment for the reasons. Thank you.

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED] Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED]  
08/2024

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 3:17:50 PM  
**Attachments:** [378-parramatta-rd\\_0.pdf](#)

---

Submitted on Mon, 26/08/2024 - 15:15

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush West, 2140

**Please provide your view on the project**

I object to it

**Submission file**

[378-parramatta-rd\\_0.pdf](#) (1.49 MB)

**Submission**

I am the owners of [REDACTED]. I request to rezone the whole land of our campus. Please see attachment for the reasons. Thank you

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED] Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED]  
8/2024

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 3:21:46 PM

---

Submitted on Mon, 26/08/2024 - 15:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Haowei

**Last name**

Wang

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

NORTH STRATHFIELD

**Please provide your view on the project**

I support it

**Submission**

I support rezoning the area to allow for increased density of residential apartment buildings in light of the housing crisis that we are trying to resolve in NSW. The area is close to transport and close to the city and provides good amenities to meet people's lifestyle needs. I think it will be good for the future generations.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 3:34:55 PM  
**Attachments:** [18-brussels-street.pdf](#)

---

Submitted on Mon, 26/08/2024 - 15:20

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Heidi

### **Last name**

White

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

North Strathfield

### **Please provide your view on the project**

I am just providing comments

### **Submission file**

[18-brussels-street.pdf](#) (308.85 KB)

### **Submission**

We live on [REDACTED] North Strathfield, near Powells Creek. Our family is supportive of the proposed rezoning plan. However, we would like to point out that there are brand-new duplexes within our proposed amalgamated block. For example, one such duplex is located at [REDACTED], North Strathfield (please refer to the attached photo).

Understandably, the owners of these new duplexes have high price expectations if approached by developers. After speaking with several developers, it has been pointed out that it is challenging to meet the reasonable price expectations of these new duplex owners with the proposed FSR of 2.2.



Therefore, we strongly recommend increasing the proposed FSR for our amalgamated block which includes 18 Brussels Street North Strathfield, from 2.2 to 2.8 or 3.2. This adjustment would also align with neighbouring blocks that have FSRs above 2.8.

Thank you.

**I agree to the above statement**

Yes

**North Strathfield - two brand new duplexes which are very expensive**



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 4:36:07 PM  
**Attachments:** [draft-for-tod-submission.pdf](#)

---

Submitted on Mon, 26/08/2024 - 16:33

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Concord West

**Please provide your view on the project**

I support it

**Submission file**

[draft-for-tod-submission.pdf](#) (169.46 KB)

**Submission**

I will support the TOD Project with the conditions as per the attached is accepted.

**I agree to the above statement**

Yes

To:  
Department of Planning  
Canada Bay Council  
Strathfield Council

26 August 2024

Property Owner: [REDACTED]

**Subject: Request for Extension of TOD Rezone Boundary Map to Include Upper North George Street, Concord West NSW 2138**

Dear Department of Planning,

I am writing to follow up on my attendance at the recent TOD in-person consultative meeting, and to formally submit my request for consideration.

I propose that the current TOD rezone boundary map be extended further north to include the upper end of George Street, Concord West, towards Victoria Avenue. At present, the proposed rezoning stops just short of the One King Street project (the old Westpac bank building). My neighbours and I strongly believe that the rezoning should be extended up to the Victoria Avenue intersection, or even further, reaching the George Street cul-de-sac. This extension would transition the area from the current inadequate R3 zoning to R4 zoning.

The recent Parramatta Road Strategy included all of George Street, Concord West, right up until the cul-de-sac adjoining Station Ave and they labelled this said area in their boundary zoning map, the *Homebush North Precinct*! These unfortunate properties have now been omitted from the TOD rezoning at Council's request, and removed from the '*Homebush North Precinct*' zoning map, supposedly in order to preserve Canada Bay's R2 to R3 work back in 2022.

Our properties, with narrow widths of approximately 10.5 metres and depths of around 50 metres, are poorly suited for townhouse development under the R3 zoning. Developers have shown little interest in pursuing projects under the current zoning, as it would require acquiring multiple properties, with restricted height, which is not financially viable. However, there is significant interest in development if the zoning were changed to R4, enabling the construction of units which would assist in achieving Government housing targets.

**Key Points:**

- Our properties are within 100 - 200 metres of Concord West station, making them prime candidates for higher-density development.
- Several adjoining property owners (e.g., [REDACTED]) are willing to sell collectively to developers.
- Most of our properties consist of older, clad homes that no longer align with modern housing designs, making this area ideal for redevelopment.
- While Canada Bay Council rezoned our properties from R2 to R3 in 2022, the broader context has changed with the current TOD Project focusing on R4 high-rise developments.
- Rezoning from R3 to R4 would support Government efforts to meet housing targets.

In 2015, several developers approached us with interest in purchasing our properties collectively. Unfortunately, the process was hindered by the costs, time, and challenges of applying for a spot

rezone as many owners are pensioners and can't not financially contribute. The lack of R4 zoning ultimately made the project unfeasible.

I understand that Canada Bay Council has requested the Department of Planning to exclude our properties from the TOD Project to preserve the R2 to R3 rezoning however, I believe it is only fair that our properties be reconsidered for R4 zoning in line with the TOD Project.

I urge you to review this submission and consider extending the TOD Rezone map to include the upper end of George Street. This adjustment would align with the broader development goals of the area and provide a viable solution to the challenges posed by the current zoning and housing targets.

Thank you for your time and consideration.

Sincerely,

[Redacted signature]

[Redacted contact information]

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 4:52:39 PM  
**Attachments:** [draft-for-tod-submission.docx](#)

---

Submitted on Mon, 26/08/2024 - 16:52

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

CONCORD WEST

**Please provide your view on the project**

I support it

**Submission file**

[draft-for-tod-submission.docx](#) (16.41 KB)

**Submission**

I support the TOD Project with the condition that the Upper North of George Street CONCORD WEST be included in the Homebush North Precinct map for inclusions of R4 rezoning.

**I agree to the above statement**

Yes



To:  
Department of Planning  
Canada Bay Council  
Strathfield Council

26 August 2024

Property Owner: [REDACTED]

**Subject: Request for Extension of TOD Rezone Boundary Map to Include Upper North George Street, Concord West NSW 2138**

Dear Department of Planning,

I am writing to follow up on my attendance at the recent TOD in-person consultative meeting, and to formally submit my request for consideration.

I propose that the current TOD rezone boundary map be extended further north to include the upper end of George Street, Concord West, towards Victoria Avenue. At present, the proposed rezoning stops just short of the One King Street project (the old Westpac bank building). My neighbours and I strongly believe that the rezoning should be extended up to the Victoria Avenue intersection, or even further, reaching the George Street cul-de-sac. This extension would transition the area from the current inadequate R3 zoning to R4 zoning.

The recent Parramatta Road Strategy included all of George Street, Concord West, right up until the cul-de-sac adjoining Station Ave and they labelled this said area in their boundary zoning map, the *Homebush North Precinct*! These unfortunate properties have now been omitted from the TOD rezoning at Council's request, and removed from the '*Homebush North Precinct*' zoning map, supposedly in order to preserve Canada Bay's R2 to R3 work back in 2022.

Our properties, with narrow widths of approximately 10.5 metres and depths of around 50 metres, are poorly suited for townhouse development under the R3 zoning. Developers have shown little interest in pursuing projects under the current zoning, as it would require acquiring multiple properties, with restricted height, which is not financially viable. However, there is significant interest in development if the zoning were changed to R4, enabling the construction of units which would assist in achieving Government housing targets.

**Key Points:**

- Our properties are within 100 - 200 metres of Concord West station, making them prime candidates for higher-density development.
- Several adjoining property owners (e.g., [REDACTED]) are willing to sell collectively to developers.
- Most of our properties consist of older, clad homes that no longer align with modern housing designs, making this area ideal for redevelopment.
- While Canada Bay Council rezoned our properties from R2 to R3 in 2022, the broader context has changed with the current TOD Project focusing on R4 high-rise developments.
- Rezoning from R3 to R4 would support Government efforts to meet housing targets.

In 2015, several developers approached us with interest in purchasing our properties collectively. Unfortunately, the process was hindered by the costs, time, and challenges of applying for a spot

rezone as many owners are pensioners and can't not financially contribute. The lack of R4 zoning ultimately made the project unfeasible.

I understand that Canada Bay Council has requested the Department of Planning to exclude our properties from the TOD Project to preserve the R2 to R3 rezoning however, I believe it is only fair that our properties be reconsidered for R4 zoning in line with the TOD Project.

I urge you to review this submission and consider extending the TOD Rezone map to include the upper end of George Street. This adjustment would align with the broader development goals of the area and provide a viable solution to the challenges posed by the current zoning and housing targets.

Thank you for your time and consideration.

Sincerely,

[REDACTED]  
[REDACTED]

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 5:36:48 PM

---

Submitted on Mon, 26/08/2024 - 17:36

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Roland

**Last name**

Koestlin

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2135

**Please provide your view on the project**

I am just providing comments

**Submission**

I agree with submission of the Owners Corporation of SP60097 at 378 Parramatta Rd, Homebush West. I would fully support this project if the entirety of 378 Parramatta Rd were rezoned.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 6:20:54 PM  
**Attachments:** [homebush-letter.pdf](#)

---

Submitted on Mon, 26/08/2024 - 18:20

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

████████████████████

**Suburb/Town & Postcode**

Homebush, 2140

**Please provide your view on the project**

I object to it

**Submission file**

[homebush-letter.pdf](#) (46.01 KB)

**Submission**

See uploaded file

**I agree to the above statement**

Yes

Dear Department of Planning, Housing and Infrastructure,

We recently attended the information session on the planned Homebush development (Homebush TOD rezoning proposal). While we agree that constructing additional housing is of great importance in Sydney, we are greatly concerned about the sole focus on housing in the plan as presented, seemingly at the cost of the quality of life in the Homebush area.

The Homebush area currently has a number of issues that we feel will be exasperated if the proposed plan is executed in its current form, as the current availability of various facilities is barely enough for the people currently living in the area and definitely won't suffice if the population increases drastically. Below we list these concerns:

- **Parramatta Road.** Let's start with the elephant in the room: Parramatta Road. During rush hour, this road is nearly gridlocked on a daily basis and it won't be able to handle the increase in traffic that's likely to result from increasing the population density in Homebush, as proposed. This is already causing emergency response vehicles to take 15 minutes for a section that should normally take 3 to 5 minutes. Hence, it's imperative that *people are persuaded to travel using public transport* to not let the situation deteriorate any further.
- **Bus frequency from Strathfield station.** One of the main reasons for Homebush to be the designated area for the proposed plan is its good public transport connections. However, this is only the case during rush hour and even then the capacity is limited. Currently, there is one bus line going from Strathfield to Homebush: 526. From Strathfield station, these busses leave within 5 minutes of the train from Strathfield to Homebush. As the frequency of the busses is every 15 minutes during rush hour and every 30 minutes outside that timeframe, this results in these busses being very crowded (the recent removal of the alternative line 525 didn't exactly improve this). If the number of people increases, taking the bus will become nearly impossible and hence, to maintain a reasonable public transport connection, the *frequency of busses should be greatly increased* to at least once every 10 minutes during rush hour and once every 15 minutes outside that timeframe. We also recommend spacing the bus and train times apart better to ensure it becomes easier to reach Homebush.
- **Bus routes along Parramatta Road.** There are currently no bus routes to/from Homebush along Parramatta Road. This means that anyone traveling towards Burwood or Flemington either needs to walk for 30 minutes, take a 30-minute detour, or travel by car. As Parramatta Road is already incredibly busy, the latter option should be avoided, which leaves the unappealing detour or excessive walk, especially for differently-abled people. Hence, we propose that *additional bus routes* are added that connect Homebush along Parramatta Road to the neighbouring suburbs.
- **Unsafe pedestrian walkways.** Currently, walking from Homebush to Strathfield station involves navigating a number of streets that are very poorly lit at night, creating dangerous situations due to poor visibility of pedestrians to other traffic and an overall feeling of anxiety when walking home alone at night. For example, to reach the train station without jaywalking, the tunnel next to the gas station needs to be traversed. The lights in this tunnel have been malfunctioning for months, creating a very unsafe feeling when walking there. We recommend *improving the lighting* on all streets in the Homebush and Strathfield area to ensure the area's safety is improved.
- **Accessible pedestrian walkways.** Most sidewalks in Homebush are fairly narrow and when walking to Strathfield station, one has to cross Cooper Street. The sidewalks here don't have ramps to enable differently-abled people from easily crossing the road, resulting in them either having to navigate the step down onto the road, or having to go back to Parramatta Road to use one of the ramps there. When the number of people increases, the number of people who are unable to reasonably cross the street will also increase because of this. Hence, we recommend improving the situation by widening the sidewalks and adding ramps to make crossing the road doable for everyone.

- **Emergency services.** With the proposed increased population density, the number of people who need emergency services will also increase. Currently the closest hospital is Concord Hospital and the nearest police and firefighters are in Strathfield. All three of these are already operating at full capacity (and sometimes beyond that, considering the wait time in the emergency ward of Concord Hospital) and hence increasing the load on them further will result in it only being a matter of time before help arrives too late. Hence, we strongly recommend *either increasing the capacity of the existing emergency services, or including these services in the proposed plan* for Homebush itself.
- **Retail area.** Homebush currently has one comparatively small supermarket (Aldi), and two smaller specialised supermarkets (Komart and David's Fresh). These stores are already quite busy and are unlikely to be able to cope with a drastically increased population. Furthermore, the nearest department store is in Burwood, which is currently hard to reach by any method other than car and, additionally, increasing the number of people in Homebush will result in this department store to also become very congested. Hence, the *availability of retail stores in Homebush should be improved* to reflect the increased population.
- **Green spaces.** Homebush currently has a few nice parks and play areas along Powells Creek. This area is so nice because it isn't overcrowded and children can play without having to worry too much about bothering other people. With the proposed increase in population density, the existing parks will no longer suffice, resulting in a degradation of the quality of life in the area. Hence, we propose to *extend the existing parks or create new ones* to allow for the people who live in the area to have a similar quality of life as we currently experience.

The above points aren't stand-alone, as improving the bus frequency and routes would be an important step in keeping Parramatta Road from becoming gridlocked when the population density increases. Similarly, the improvements to the pedestrian walkways would be required to encourage people to walk to Strathfield station or in the surrounding area instead of taking the car.

Hence, we implore you to take the above concerns into serious consideration, instead of only focusing on increasing the population density as fast as possible. Building more apartments in our wonderful area is needed to face the current housing crisis, but without taking into account how people are supposed to move around to their places of work, school, and friends and without maintaining a reasonable quality of life, not to mention safety, this is a step in the wrong direction, both for the people currently living in Homebush and for the people interested in moving to Homebush when the proposed plan is put into effect.

We hope the proposed plan will be revised to take our concerns into account and that an additional period of consultation is added before the proposal is passed on to parliament for approval.

Kind regards,

██████████  
██████████



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 7:08:09 PM  
**Attachments:** [george-street.docx](#)

---

Submitted on Mon, 26/08/2024 - 19:01

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

**Info**

[REDACTED]

**Suburb/Town & Postcode**

Concord west 2138

**Please provide your view on the project**

I support it

**Submission file**

[george-street.docx](#) (16.49 KB)

**Submission**

I support the TOD Project with the condition that the Upper North of George Street CONCORD WEST be included in the homebush North Precinct map for inclusions of R4 rezoning.

**I agree to the above statement**

Yes

To:  
Department of Planning  
Canada Bay Council  
Strathfield Council

26 August 2024

Property Owner: [REDACTED]

**Subject: Request for Extension of TOD Rezone Boundary Map to Include Upper North George Street, Concord West NSW 2138**

Dear Department of Planning,

I am writing to follow up on my attendance at the recent TOD in-person consultative meeting, and to formally submit my request for consideration.

I propose that the current TOD rezone boundary map be extended further north to include the upper end of George Street, Concord West, towards Victoria Avenue. At present, the proposed rezoning stops just short of the One King Street project (the old Westpac bank building). My neighbours and I strongly believe that the rezoning should be extended up to the Victoria Avenue intersection, or even further, reaching the George Street cul-de-sac. This extension would transition the area from the current inadequate R3 zoning to R4 zoning.

The recent Parramatta Road Strategy included all of George Street, Concord West, right up until the cul-de-sac adjoining Station Ave and they labelled this said area in their boundary zoning map, the *Homebush North Precinct*! These unfortunate properties have now been omitted from the TOD rezoning at Council's request, and removed from the '*Homebush North Precinct*' zoning map, supposedly in order to preserve Canada Bay's R2 to R3 work back in 2022.

Our properties, with narrow widths of approximately 10.5 metres and depths of around 50 metres, are poorly suited for townhouse development under the R3 zoning. Developers have shown little interest in pursuing projects under the current zoning, as it would require acquiring multiple properties, with restricted height, which is not financially viable. However, there is significant interest in development if the zoning were changed to R4, enabling the construction of units which would assist in achieving Government housing targets.

**Key Points:**

- Our properties are within 100 - 200 metres of Concord West station, making them prime candidates for higher-density development.
- Several adjoining property owners (e.g., 186, 196, 198, 200 George Street, 39 George Street, and properties on Victoria Avenue) are willing to sell collectively to developers.
- Most of our properties consist of older, clad homes that no longer align with modern housing designs, making this area ideal for redevelopment.
- While Canada Bay Council rezoned our properties from R2 to R3 in 2022, the broader context has changed with the current TOD Project focusing on R4 high-rise developments.
- Rezoning from R3 to R4 would support Government efforts to meet housing targets.

In 2015, several developers approached us with interest in purchasing our properties collectively. Unfortunately, the process was hindered by the costs, time, and challenges of applying for a spot

rezone as many owners are pensioners and can't not financially contribute. The lack of R4 zoning ultimately made the project unfeasible.

I understand that Canada Bay Council has requested the Department of Planning to exclude our properties from the TOD Project to preserve the R2 to R3 rezoning however, I believe it is only fair that our properties be reconsidered for R4 zoning in line with the TOD Project.

I urge you to review this submission and consider extending the TOD Rezone map to include the upper end of George Street. This adjustment would align with the broader development goals of the area and provide a viable solution to the challenges posed by the current zoning and housing targets.

Thank you for your time and consideration.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 8:12:52 PM  
**Attachments:** [homebush-tod-submission.docx](#)

---

Submitted on Mon, 26/08/2024 - 20:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Darren

### **Last name**

Zhang

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

2141

### **Please provide your view on the project**

I object to it

### **Submission file**

[homebush-tod-submission.docx](#) (13.74 KB)

### **Submission**

See attached file thank you

### **I agree to the above statement**

Yes

Whilst I'm not against the construction of high density housing in the Homebush/North Strathfield area, I believe the major congestion issue of Parramatta Rd and its surrounding side streets must first be addressed in the form of a comprehensive plan with approvals obtained prior to the rezoning. The local roads of the area is already at a extremely low Level of Service even during off peak times with the current housing in the area.

I believe the following road network issues must be addressed as a matter of priority:

1. Major congestion issues is experienced on Parramatta Rd both east and west bound during both peak and weekend hours. This may be due to the large amount of traffic light intersections with numerous side streets entering the road. This is further exacerbated by priority given to the various M4 on/off ramps.

Furthermore, the lack of drainage systems along the road creates large pools of water during even minor rain events leading to potential accidents as well as splash onto pedestrians.

2. Bridge Rd. The narrow width of Bridge Rd along with the immediate roundabout just south of the intersection frequently causes traffic to back out onto Parramatta Rd and is a major hazard.

3. George St. With this street currently being the only way in and out of the Bakehouse Quarter, major congestion is experienced with traffic trying to come out onto Parramatta Rd. Although I see new local roads being proposed connecting onto George St, their links onto Parramatta Rd may add to the congestion already experienced on there through the introduction of additional signalised intersections.

4. Single straight through lane on Parramatta Rd for westbound traffic at the M4 on ramp makes this section of the road undriveable even during off peak times and forces traffic into side street "rat runs".

I believe the community deserves a coherent and all-encompassing plan for the easing of congestion and safety of Parramatta Road come first rather than a knee jerk reaction to immediately rezone in the face low housing supplies.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 8:40:18 PM  
**Attachments:** [submission-to-nsw-planning.pdf](#)

---

Submitted on Mon, 26/08/2024 - 20:32

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Luke

### **Last name**

Liu

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Burwood

### **Please provide your view on the project**

I support it

### **Submission file**

[submission-to-nsw-planning.pdf](#) (1.3 MB)

### **Submission**

I am lot owner of unit [REDACTED] I request to rezone whole land of our campus to high density residential. Please see attachment for reasons.

### **I agree to the above statement**

Yes



Dear NSW Planning,

Owners Corporation of [REDACTED] engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

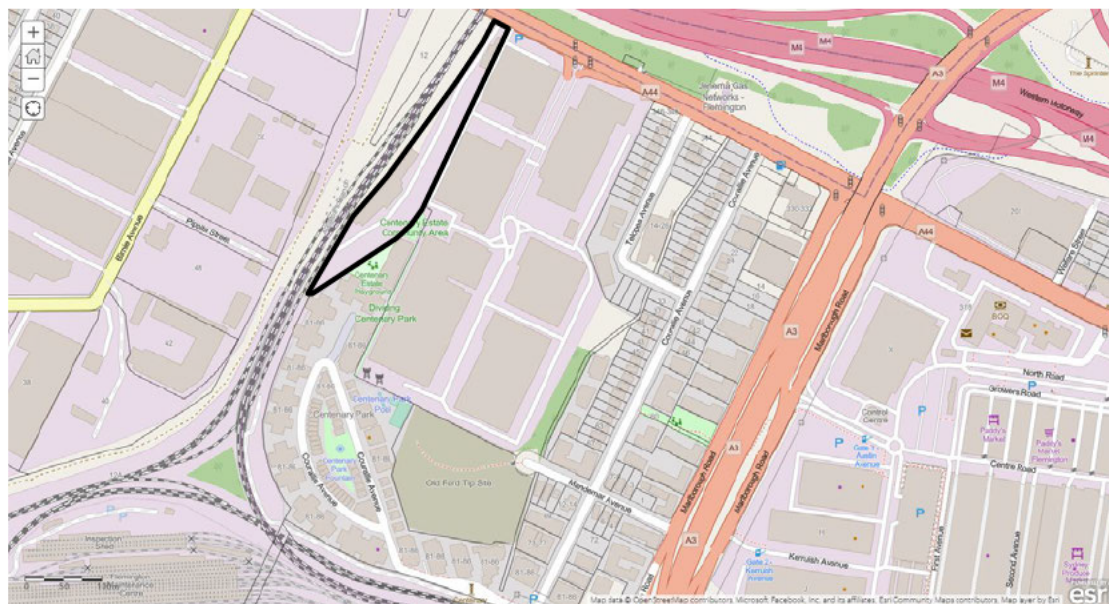


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

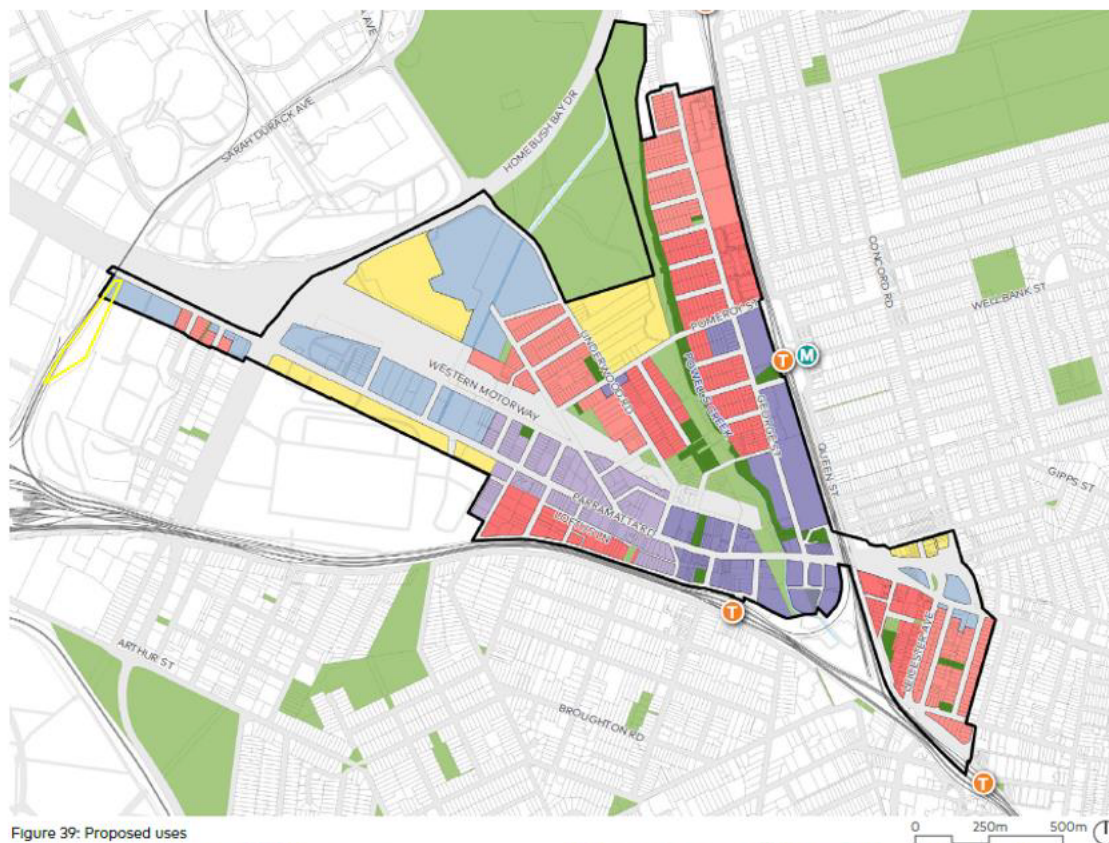


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )



## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

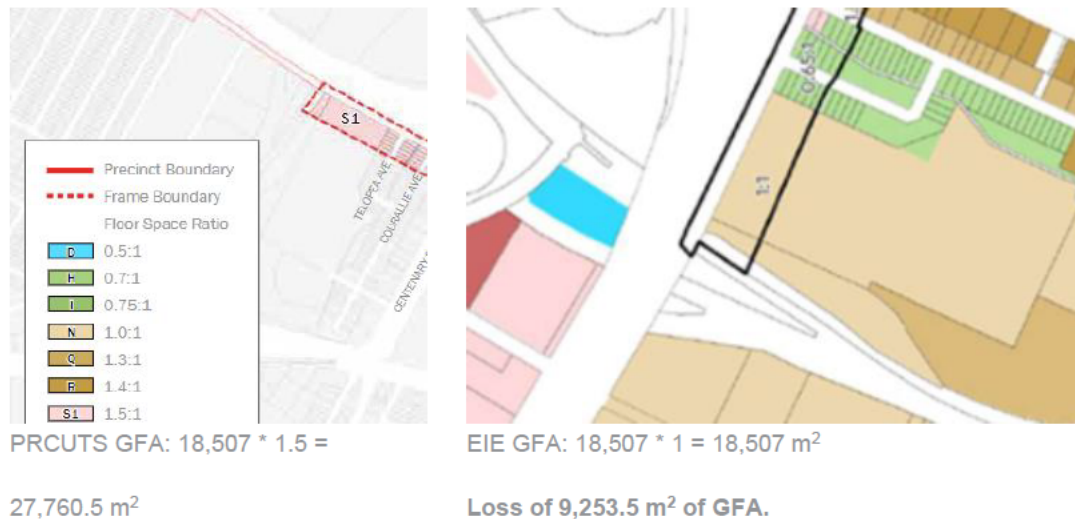


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy



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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

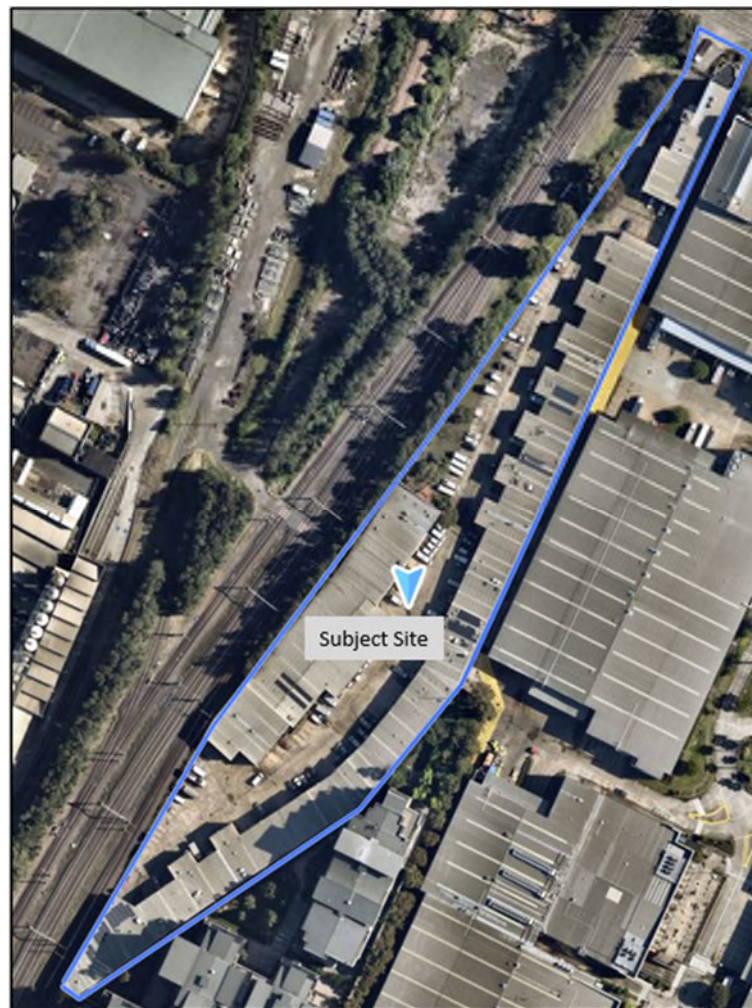


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
→ E	5,197	-	-
← W	5,570	-	-
→ E ← W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
→ E	6,067	-	-
← W	6,244	-	-
→ E ← W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

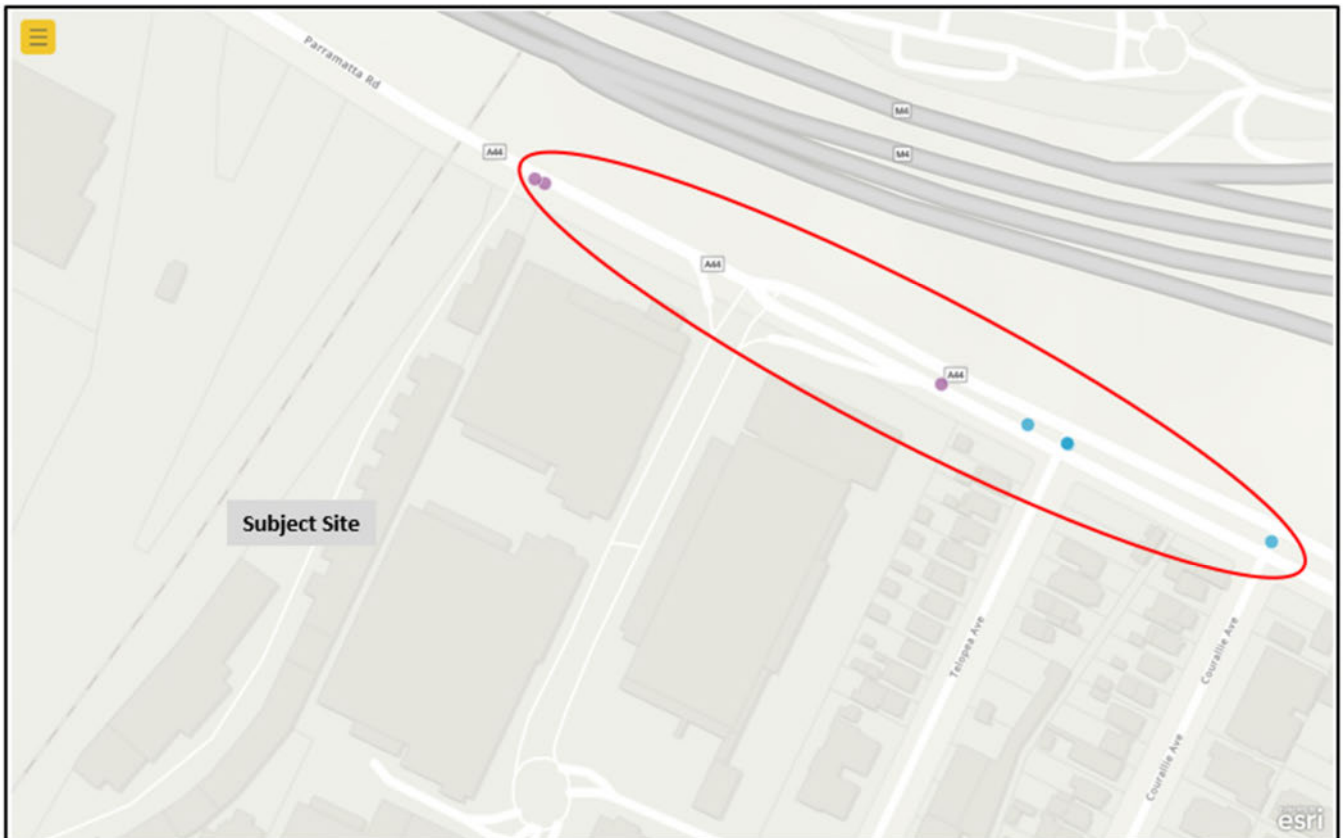


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

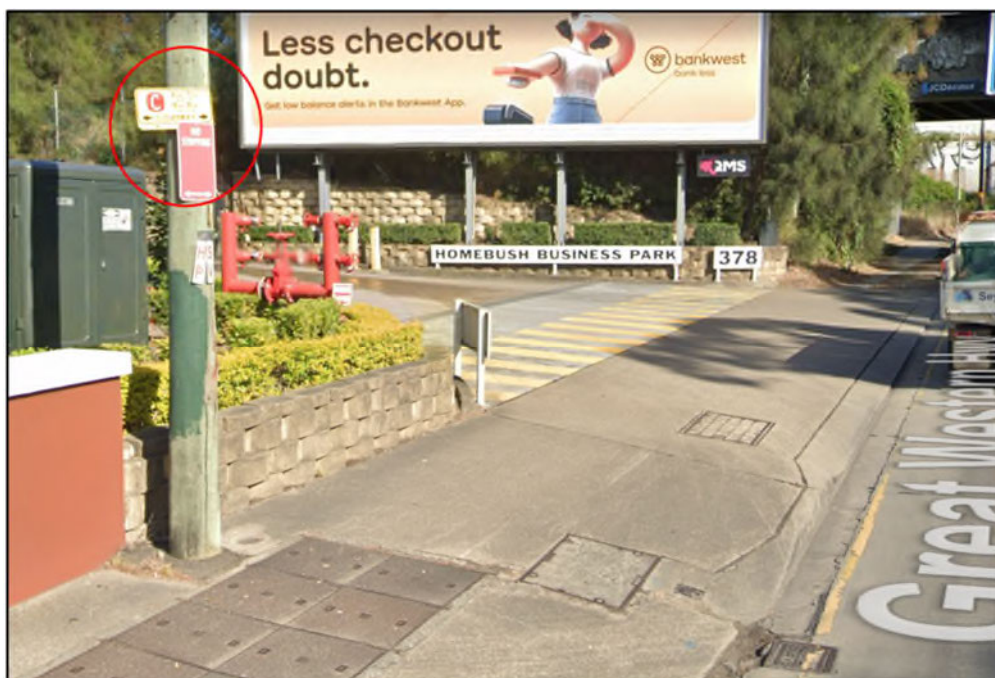


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				<b>65</b>	<b>63</b>
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.



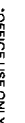
## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

**Plan Drawing only to appear in this section**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 9:44:06 PM  
**Attachments:** [submission-to-nsw-planning.pdf](#)

---

Submitted on Mon, 26/08/2024 - 21:41

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2134

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning.pdf](#) (1.3 MB)

**Submission**

I am a family member of the owners [REDACTED]. I request to rezone the whole land of our campus. Please see attachment for the reasons.

Many Thanks,  
Angela

**I agree to the above statement**

Yes

Dear NSW Planning,

Owners Corporation of [REDACTED], Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

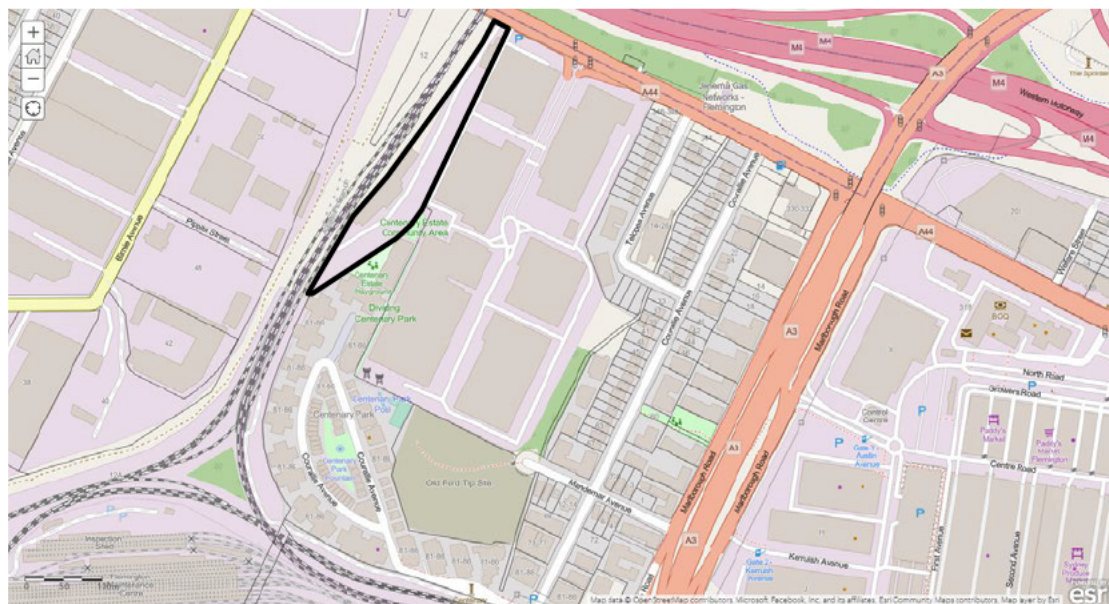


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary





- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

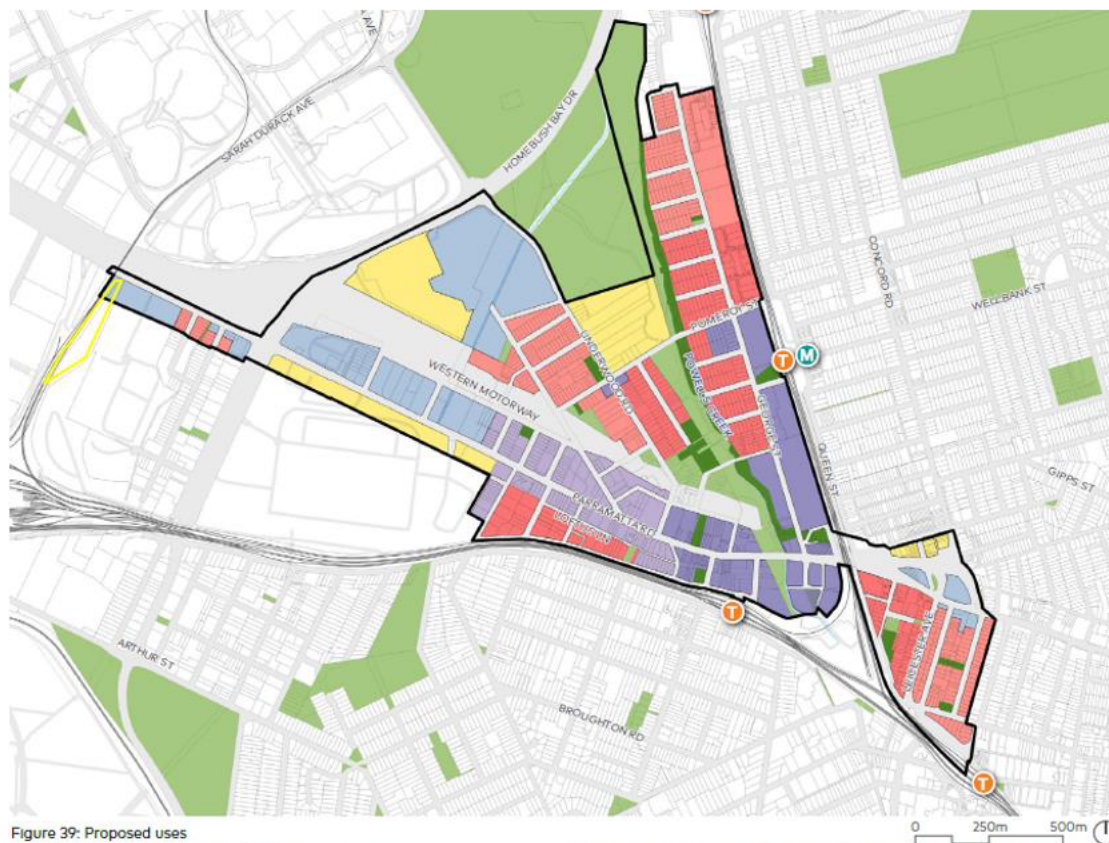


Figure 39: Proposed uses

Precinct Boundary Existing Open Space Special Activities + Markets Higher Density Residential  
 Metro Station Proposed Open Space and Road network Higher Density Mixed Use Medium Density Residential  
 Train Station Productivity Support and General Industrial Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.



## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓

<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

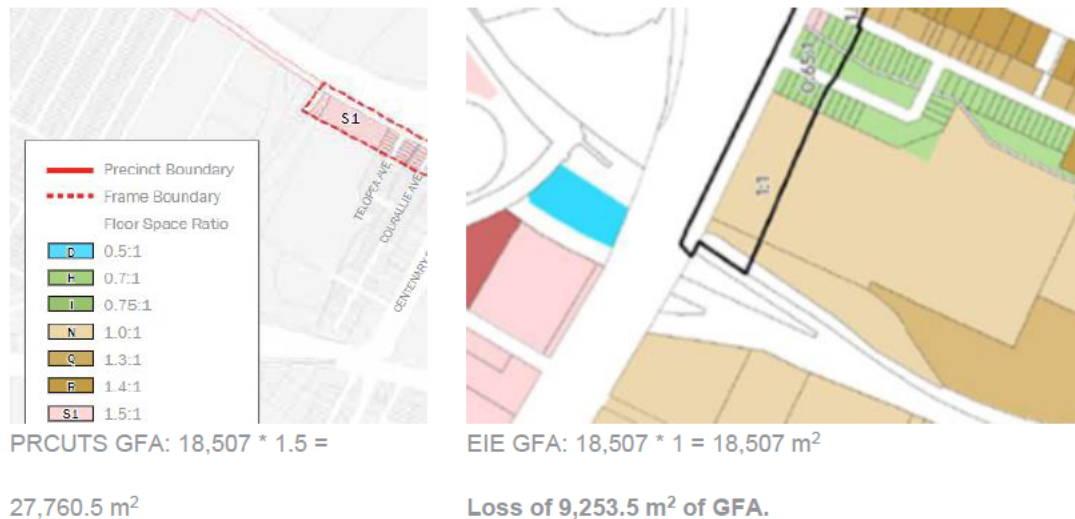


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.



Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth
- enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.

Accordingly, it is recommended that –


- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the





recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

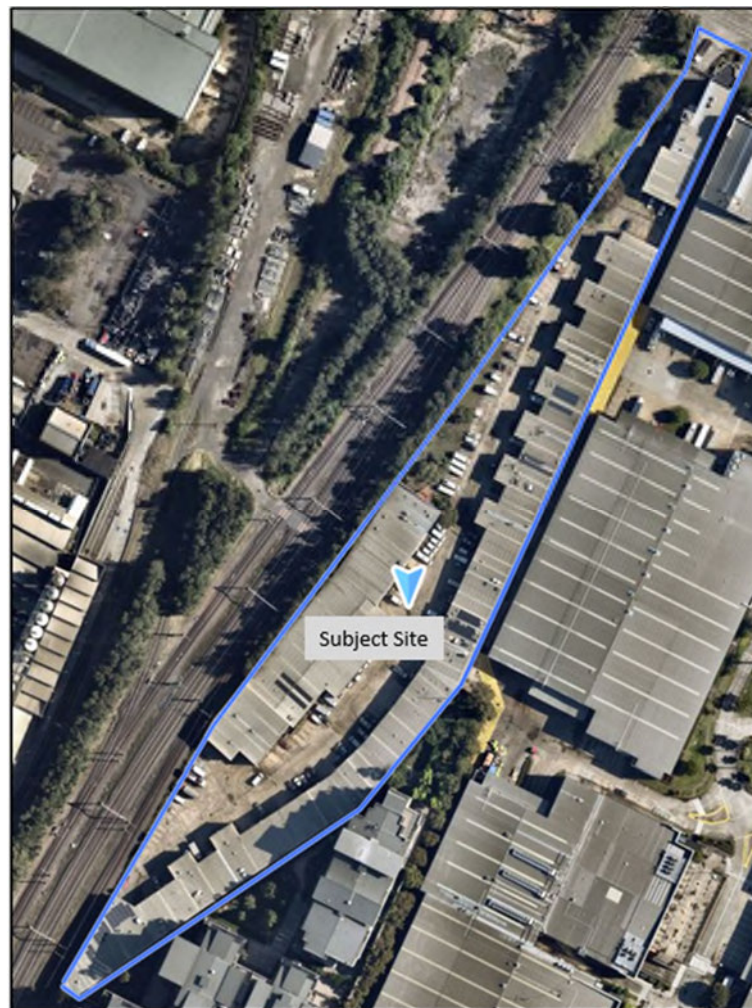


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.



### 3 EXISTING ROAD NETWORK

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#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

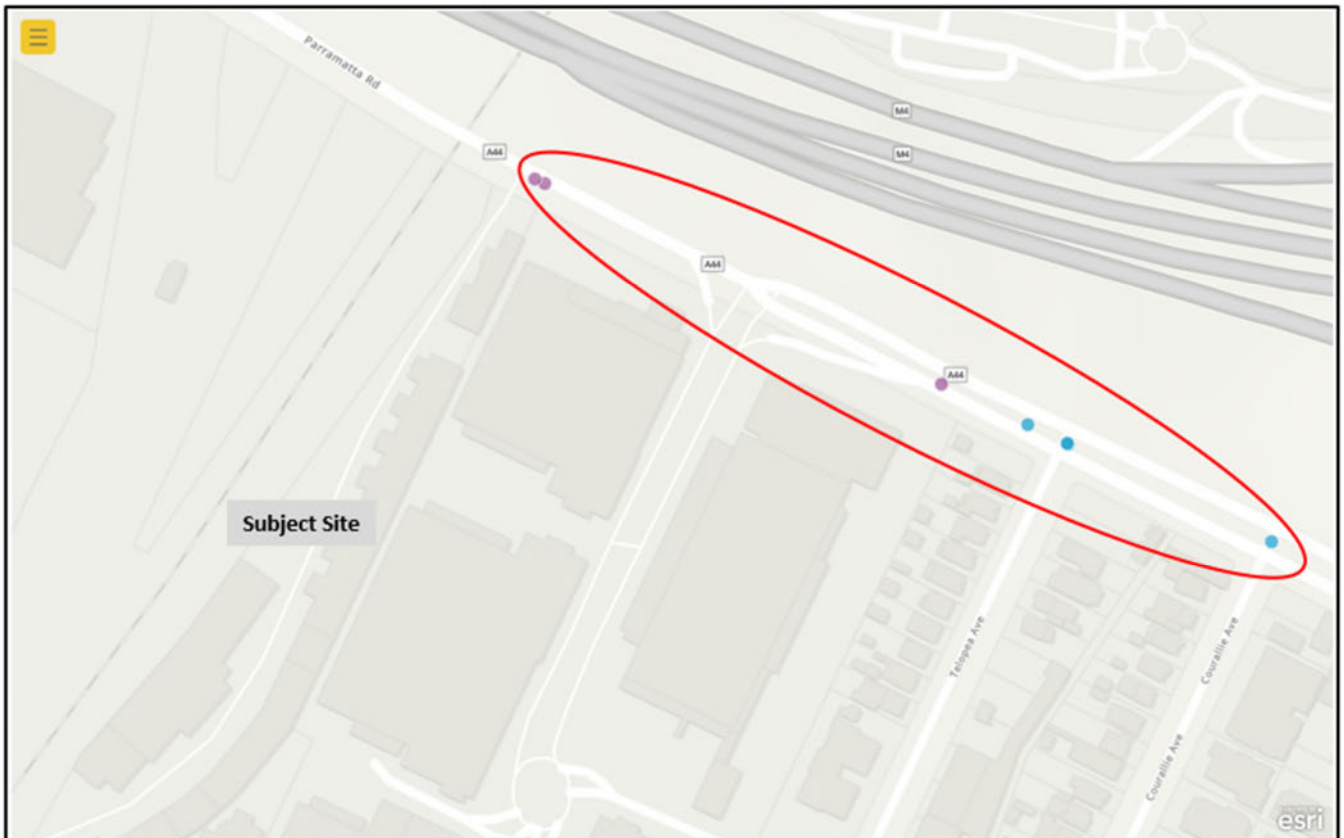


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

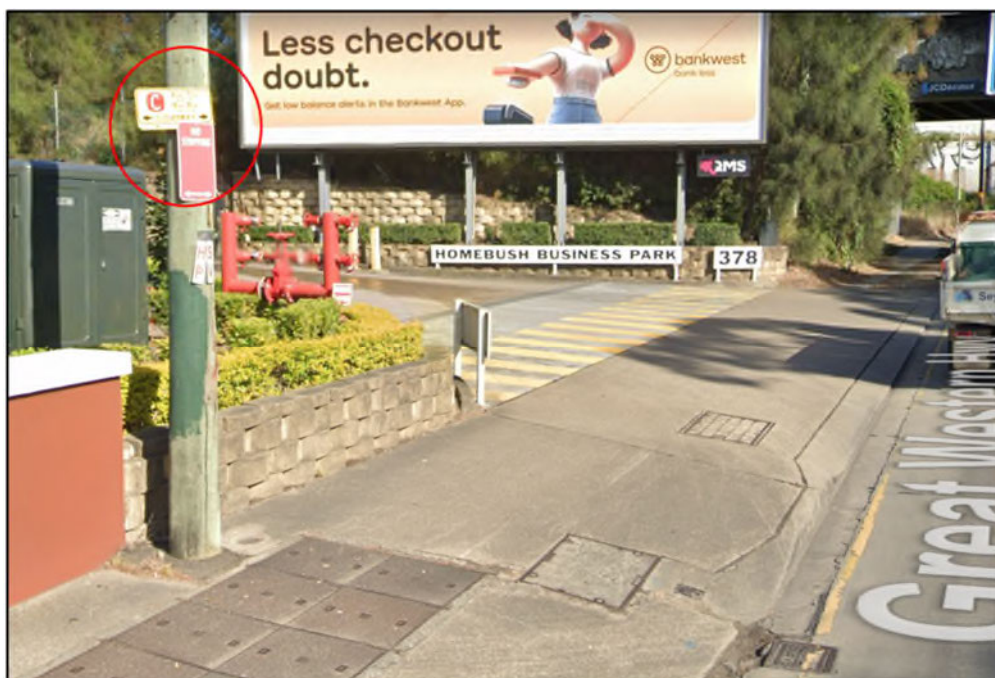


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.



Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

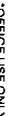
## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

**Plan Drawing only to appear in this space**

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Monday, 26 August 2024 11:39:31 PM

---

Submitted on Mon, 26/08/2024 - 23:39

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Tom

### **Last name**

Shi

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

North Strathfield

### **Please provide your view on the project**

I am just providing comments

### **Submission**

I support the proposed Homebush TOD as it addresses the critical need for housing in our area. Additionally, it will bring an end to the prolonged uncertainties surrounding rezoning discussions that have persisted for many years, enabling local residents like myself to plan for the future with greater confidence.

My family resides on [REDACTED] in North Strathfield, close to Powells Creek. Our property has been proposed with FSR of 2.2. However, given the increased construction costs and high financing expenses, combined with the presence of several newly or recently developed luxury properties on Brussels and Lorraine Streets which form part of our conglomerated block, there are limited financial incentives for some property owners within our block to sell to developers. This concern is shared by many of my neighbours, based on our discussions.



In light of these challenges, I respectfully request that the DPIE consider increasing the FSR for our block (conglomerated Brussels st/Lorraine st block next to the Powells Creek) from 2.2 to above 3. Such an adjustment would provide a stronger incentive for landowners to collaborate with developers, ultimately contributing to an increased housing supply in the area.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 11:21:15 AM  
**Attachments:** [24-08-27-response.docx](#)

---

Submitted on Tue, 27/08/2024 - 11:16

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

██████████

**Last name**

██████████

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

██

**Suburb/Town & Postcode**

North Strathfield 2137

**Please provide your view on the project**

I object to it

**Submission file**

[24-08-27-response.docx](#) (20.11 KB)

**Submission**

27.08.24

Homebush TOD Rezoning Proposal - Matters Arising.

A Little History - Sydney Metro

Sydney Metro provided residents a scenario. Largely 6 storey development over a limited area. Today's proposal massive by comparison. And why does this plan just effect the western side of North Strathfield station?

## PLANNING'S CHOICE OF AREA

This is the wrong place for this proposal. Instead of choosing a situation with far fewer traffic problems Planning has chosen an area with the worst traffic problems.

## THE PROPOSAL - INFRASTRUCTURE

Infrastructure (e.g. water, sewerage, electricity and roads) will not be provisioned before any planned construction. We are told that "the plan is to align infrastructure with growth". Infrastructure needs be made the first priority.

## ASSESSMENT BY PLANNING

It is stated that any development proposal in excess of \$60m will be assessed by Planning. Presumably your \$60m includes land purchase prices together with construction costs. It is understandable that other factors will be incorporated. What are these components?

No advice has been provided in how this might work

## AMALGAMATION OF EXISTING LOTS

Large scale amalgamation of residential lots is proposed with TOD\* plans bunching certain properties together. Very little (if any) advice is available as to how this might work. Residents appear to have been thrown a bone and told to work out how it might best be fought over. Planning has seemingly created the necessity for owners to engage with other landholders. The best we are told is that agents or developers might wish to package land parcels. Please provide landholders clarification as to the process by which Planning expects amalgamation to work.

## PROPOSED UNIT SIZE

The proposal shows average unit size as a very small 90m<sup>2</sup>. Are garages, balconies, lifts, stairs or other things included in the GFA (gross floor area)?

## DA LODGEMENT

Can a developer lodge a DA without owning a specific property? One resident makes the claim that Planning said yes.

## THE GEORGE ST / POMEROY ST INTERSECTION

Seven years ago the George St / Pomeroy St intersection was to be upgraded following approval of the Victoria Ave school. That hasn't happened and the community is left to wonder what (if anything) might happen. All transport representative James Li can tell us is that vehicle matters are to be "looked at".

## THE PROPOSED NEW ROAD BETWEEN CONWAY AND POMEROY STREETS

Planning's proposed development allows for a new roadway between Conway and Pomeroy Streets. James Li was not prepared to say that it would be ever be built. He said that it is dependent upon developers purchasing properties affected by the proposal. Should we rightly presume that similar infrastructure is dependent upon the action of developers.

## NO EXIT TO THE NORTHERN END OF POMEROY STREET

North of Pomeroy St George St is basically a dead end running for more than a kilometre in length. Why is there no exit planned to Homebush Bay Drive or even Concord Rd? (Note that an exit did once exist. That a rail crossing was available many years ago).

## THE PROPOSAL FOR A BUS ROUTE ON GEORGE ST

A government bus is proposed to travel along George St. An interesting proposal not only in respect to traffic congestion but also its operation on roundabouts unable now to handle even comparatively very small trucks.

## FORCED SALES

“There will be no forced sales. There will be no compulsory acquisition”.

It seems that should neighbours disagree on whether to stay or go conflict may arise. Sale prices may well be affected or the prospect of living in the shadow of a multi storey building may become very real.

Right now owners have little knowledge of sale prices that might accrue. All that Planning tells us is that land values in this area are already quite high” and that “the VG deals with land values”.

██████████ & Horne Concord) says that a Warsaw St property just sold fetched \$3.25m and that in all likelihood it was purchased by a developer. ██████████ says that houses in our area are really only worth \$2.6m and that land value plus 10% is all that should be expected.

Additional costs are those associated with land sale, relocation, stamp duty and other charges for the purchase of new property. None of this begins to factor in loss and suffering.

Where are owners expected to buy given current real estate values in Concord?

## ANTICIPATED RESIDENT WORKLOAD & PSYCHOLOGICAL HARDSHIPS (PARTICULARLY FOR OLDER RESIDENTS)

Liaison with other property owners, developers, solicitors, real estate agents, removalists. All the problems associated with moving. Where does one even begin?

## GREEN SPACE IDENTIFIED AS REPLACING OUR LADY OF THE ASSUMPTION SCHOOL

Proposals show much of Our Lady of The Assumption School as green space. It would be interesting to know the school’s position on their fairly recent construction now shown green.

Should the community expect to see a park built or do we simply have an area that can be shown as something other than a building?

## OUR POSITION ON PROPOSED CHANGES TO OUR PROPERTIES (Nos 7 and 9 MALTA ST)

- The proposal shows a boundary between ██████████ the 2 properties being differently defined. (No.7 as Lot1 and No.9 as Lot 3A)
- An amalgamation requirement applies to No.9 whereas none applies to No.7.
- The proposed height at No.9 is 15 storeys whereas No.7 is 18 storeys.
- The FSR’s are different. (No.7 is 3.5:1 and No.9 is 2.8:1)

██████████ are in single ownership. Accordingly it is requested that No.9 be removed from the key site map and incorporated into the area in which No.7 is now shown.

## OUR POSITION ON YOUR PROPOSED CHANGES TO NORTH STRATHFIELD

In just two words, hugely unimpressed.

A poorly thought through proposal where irrespective of stay or go lives will be massively transformed and disrupted. Politicians are fond of referring to quality outcomes. This project will achieve nothing of the sort. A proposal that seems to have been tossed into the air with a view to finding where the pieces fall. Where the property owner is left to sort through those pieces. Where a single storey house is overshadowed by an 18-storey juggernaut. Where monies that might come through the sale of property will in all likelihood not begin to cover the purchase of similar property in a similar situation.

Should an owner choose to stay massive disruption. A community torn apart by demolition, trucks, cranes, noise, workers and their vehicles. Infrastructure to which no heed has been given. Roads which are already problematic (e.g. George and Pomeroy Streets) simply left to become more chaotic. Roundabouts that don't work even now, where 3-point turns are of necessity being undertaken. And what about water, sewerage, gas and electricity. Seems that advance planning is all too hard. A century long family connection to community simply taken away. And why is this happening? Simply that immigration levels can be supported.



**I agree to the above statement**

Yes

27.08.24

## HOME BUSH TOD REZONING PROPOSAL - MATTERS ARISING.

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A century long family connection to community simply taken away. And why is this happening? Simply that immigration levels can be supported.

[REDACTED]

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 12:23:42 PM  
**Attachments:** [submit.pdf](#)

---

Submitted on Tue, 27/08/2024 - 12:19

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush West 2140

**Please provide your view on the project**

I object to it

**Submission file**

[submit.pdf](#) (1.29 MB)

**Submission**

We require to rezone our whole lot. not only front

**I agree to the above statement**

Yes

[REDACTED]

Dear NSW Planning,

Owners Corporation of SP60097 [REDACTED] engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

[REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at [REDACTED]

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

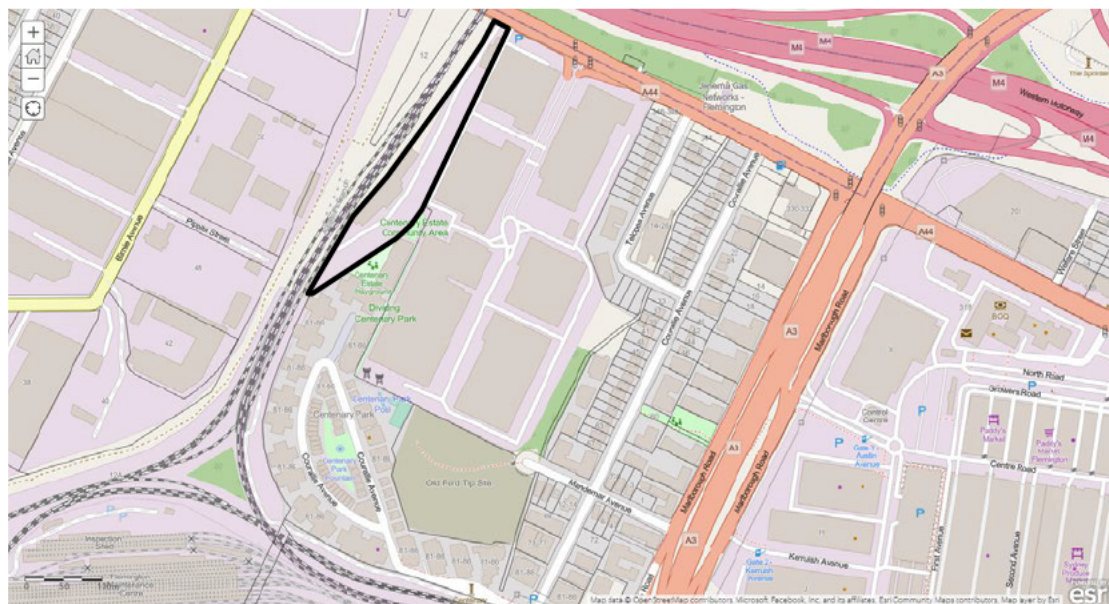


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

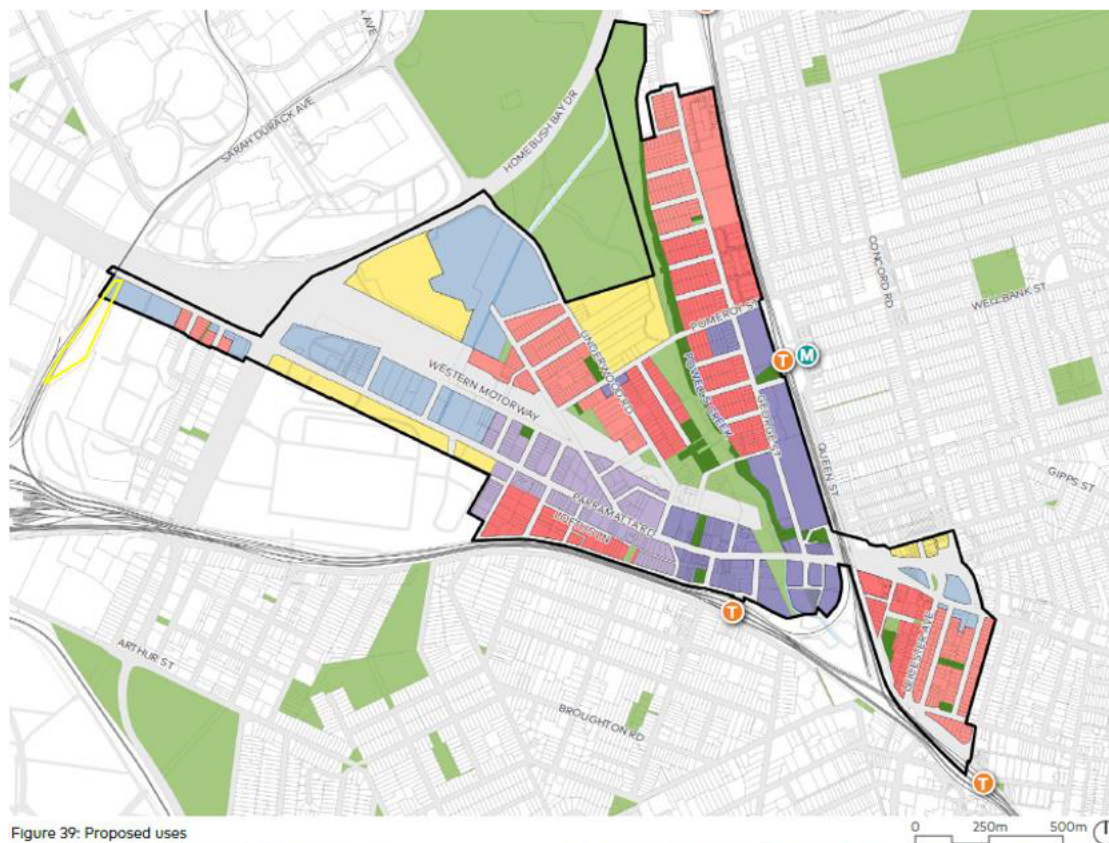


Figure 39: Proposed uses

- |                     |   |                                |                              |
|---------------------|---|--------------------------------|------------------------------|
| ■ Precinct Boundary | ■ Existing Open Space                         | ■ Special Activities + Markets | ■ Higher Density Residential |
| ● Metro Station     | ■ Proposed Open Space and Road network        | ■ Higher Density Mixed Use     | ■ Medium Density Residential |
| ● Train Station     | ■ Productivity Support and General Industrial | ■ Medium Density Mixed Use     |                              |

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.





## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓

<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

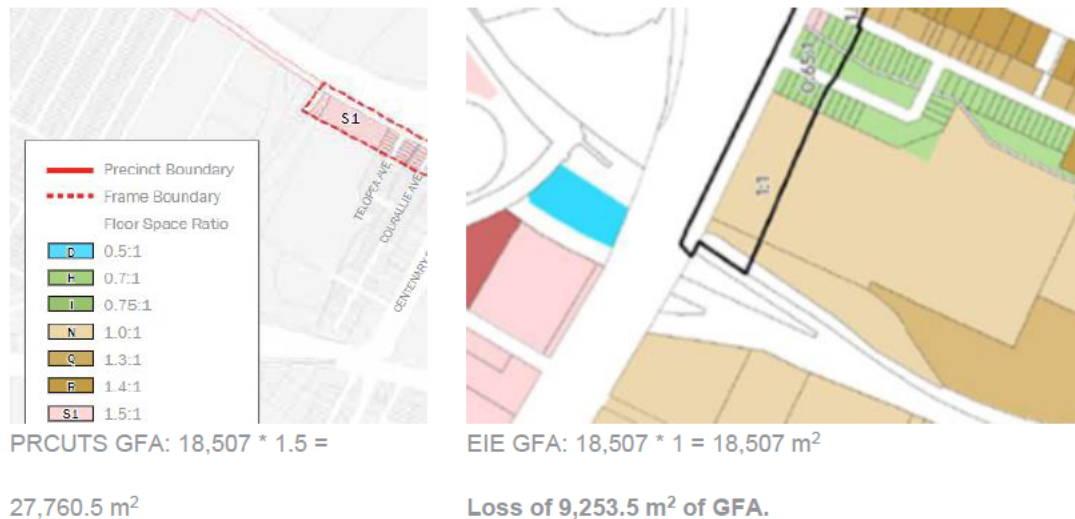


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.



Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.

Accordingly, it is recommended that –


- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the





recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

  
  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy

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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

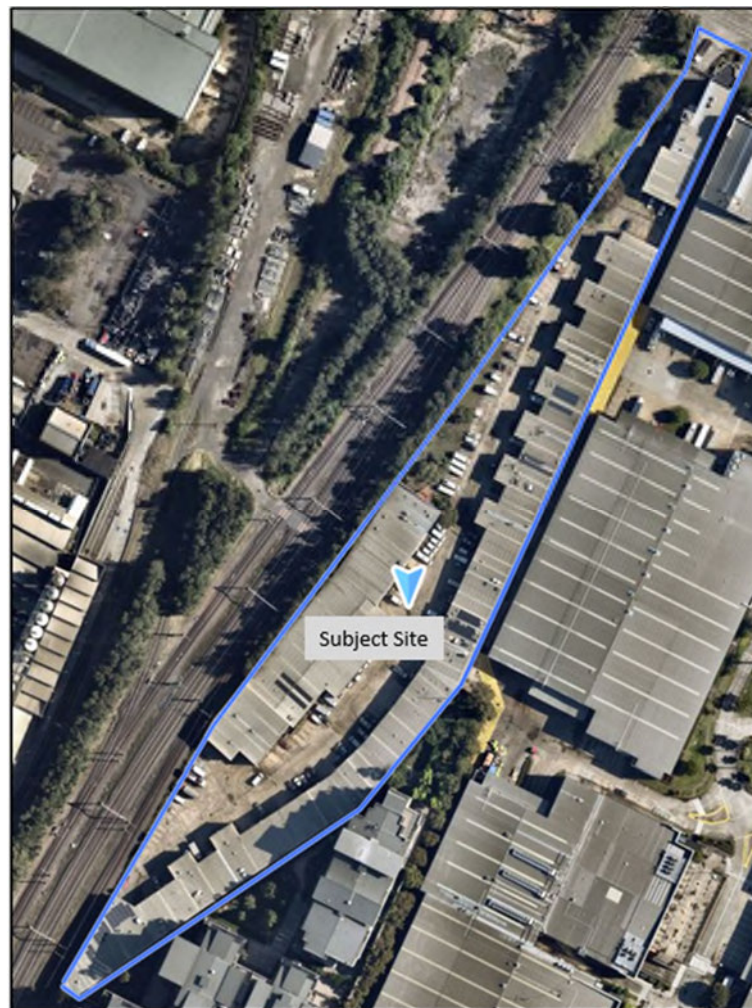


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.



### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
 E	5,197	-	-
 W	5,570	-	-
 E  W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
 E	6,067	-	-
 W	6,244	-	-
 E  W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.

## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

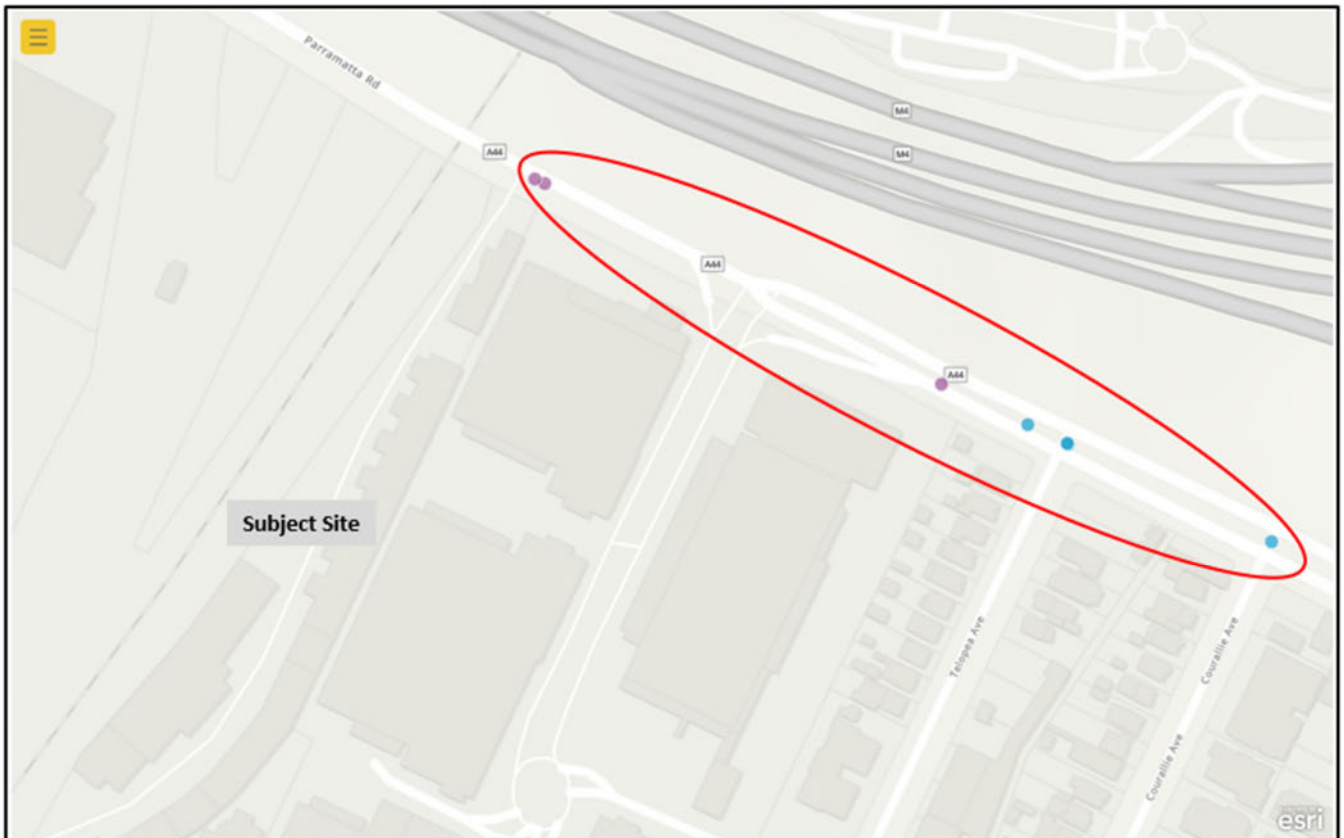


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

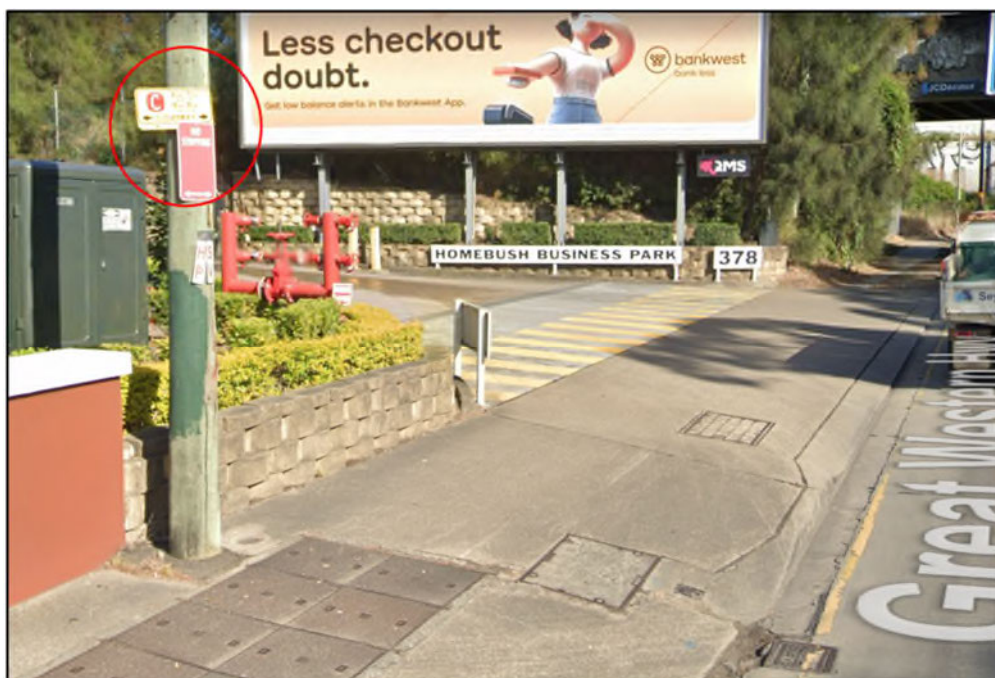


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.



Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.

## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 12:29:05 PM  
**Attachments:** [submit\\_0.pdf](#)

---

Submitted on Tue, 27/08/2024 - 12:27

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Hua

### **Last name**

Shen

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Homebush West 2140

### **Please provide your view on the project**

I object to it

### **Submission file**

[submit\\_0.pdf](#) (1.29 MB)

### **Submission**

We object to rezone our front area lot, we want to rezone our whole lot.

### **I agree to the above statement**

Yes



Dear NSW Planning,

Owners Corporation of SP60097 at [REDACTED] engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 August 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly. If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of [REDACTED]

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

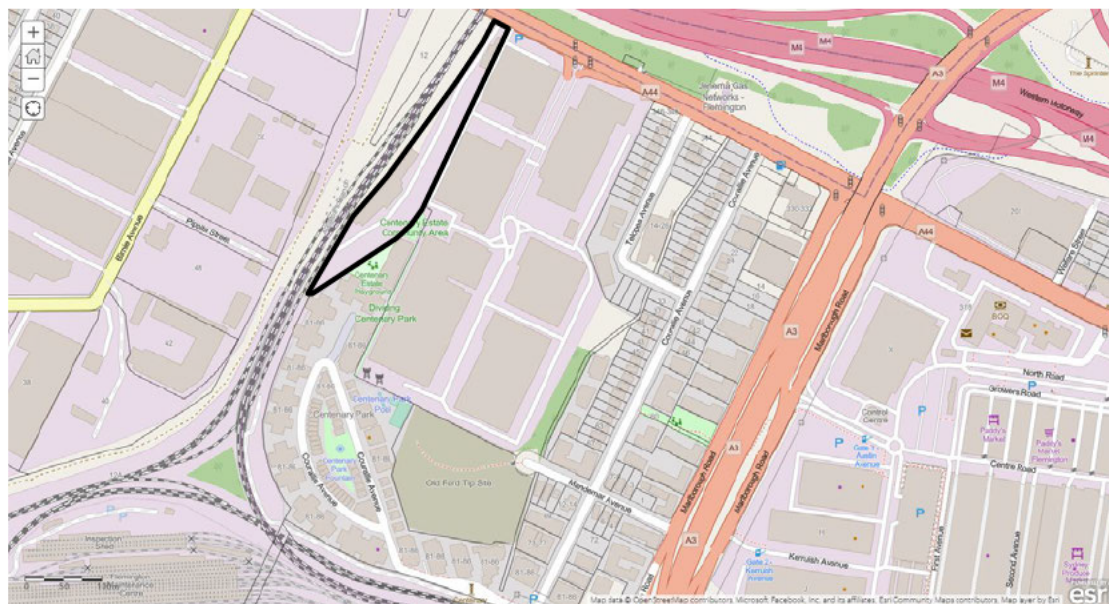


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary



- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

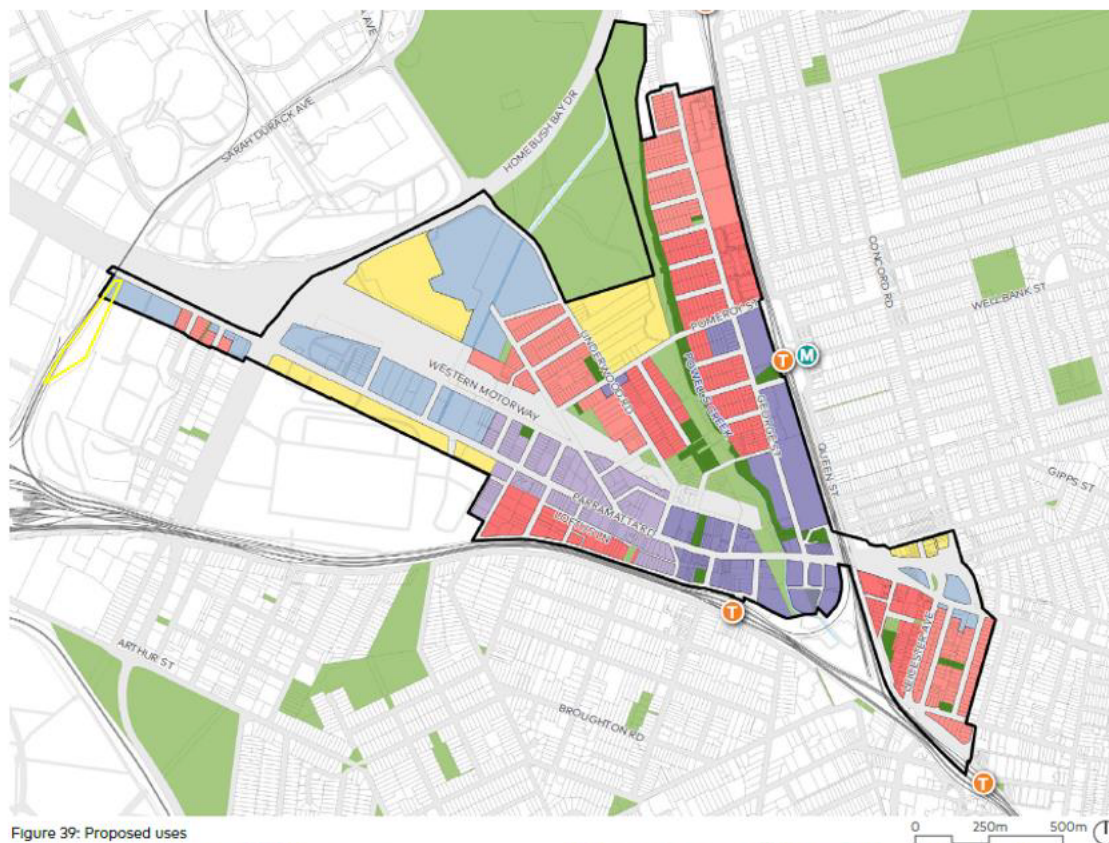


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.

## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimaged and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓



<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
--	---	---

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓

As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )



## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

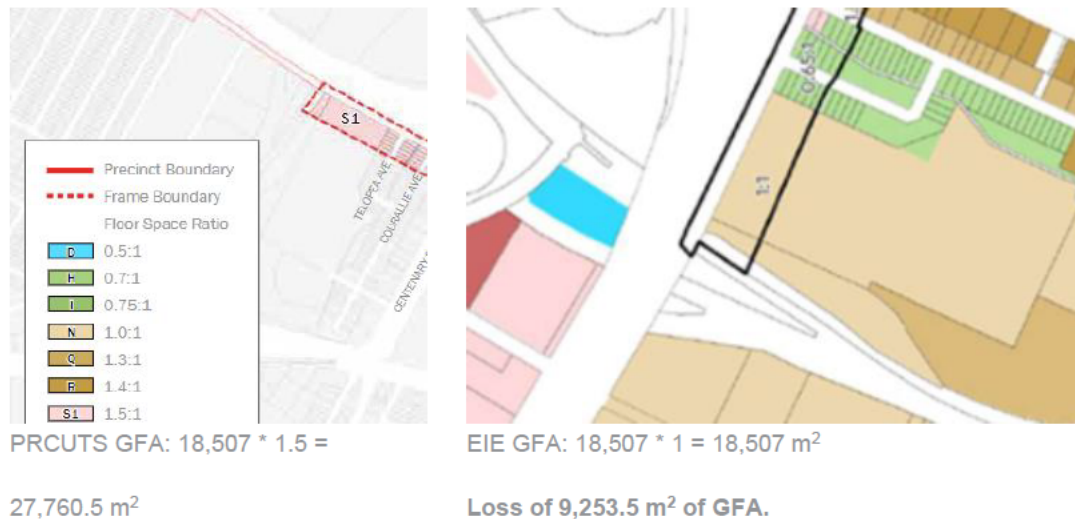


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.

Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the

recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

Ben Creighton  
Executive Planner  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy



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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

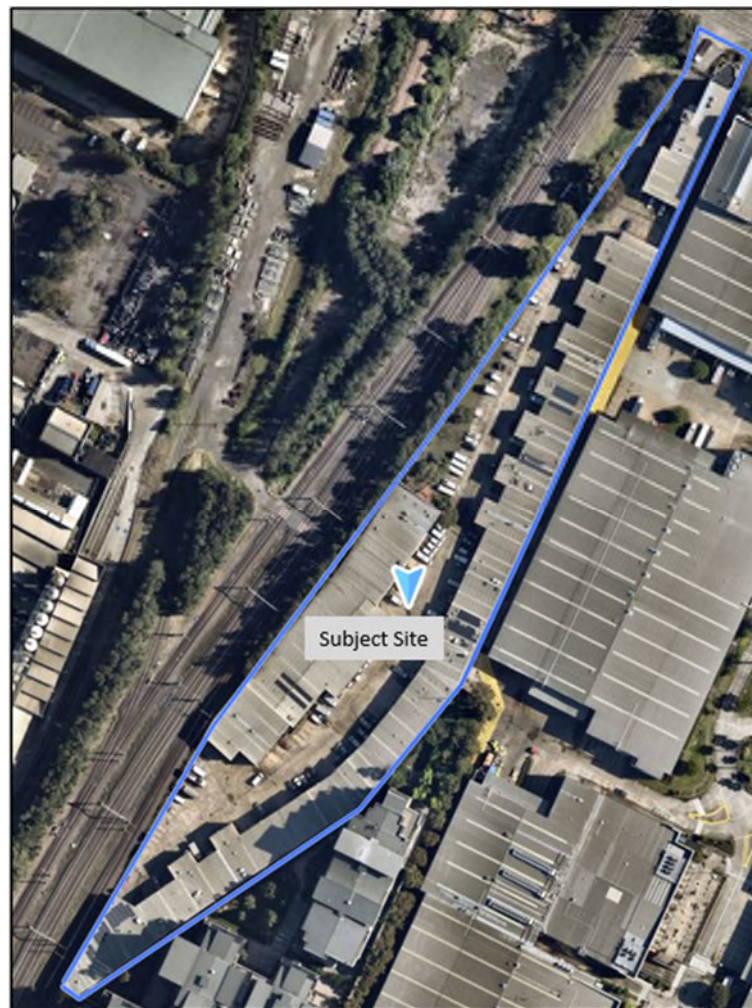


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
→ E	5,197	-	-
← W	5,570	-	-
→ E ← W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
→ E	6,067	-	-
← W	6,244	-	-
→ E ← W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

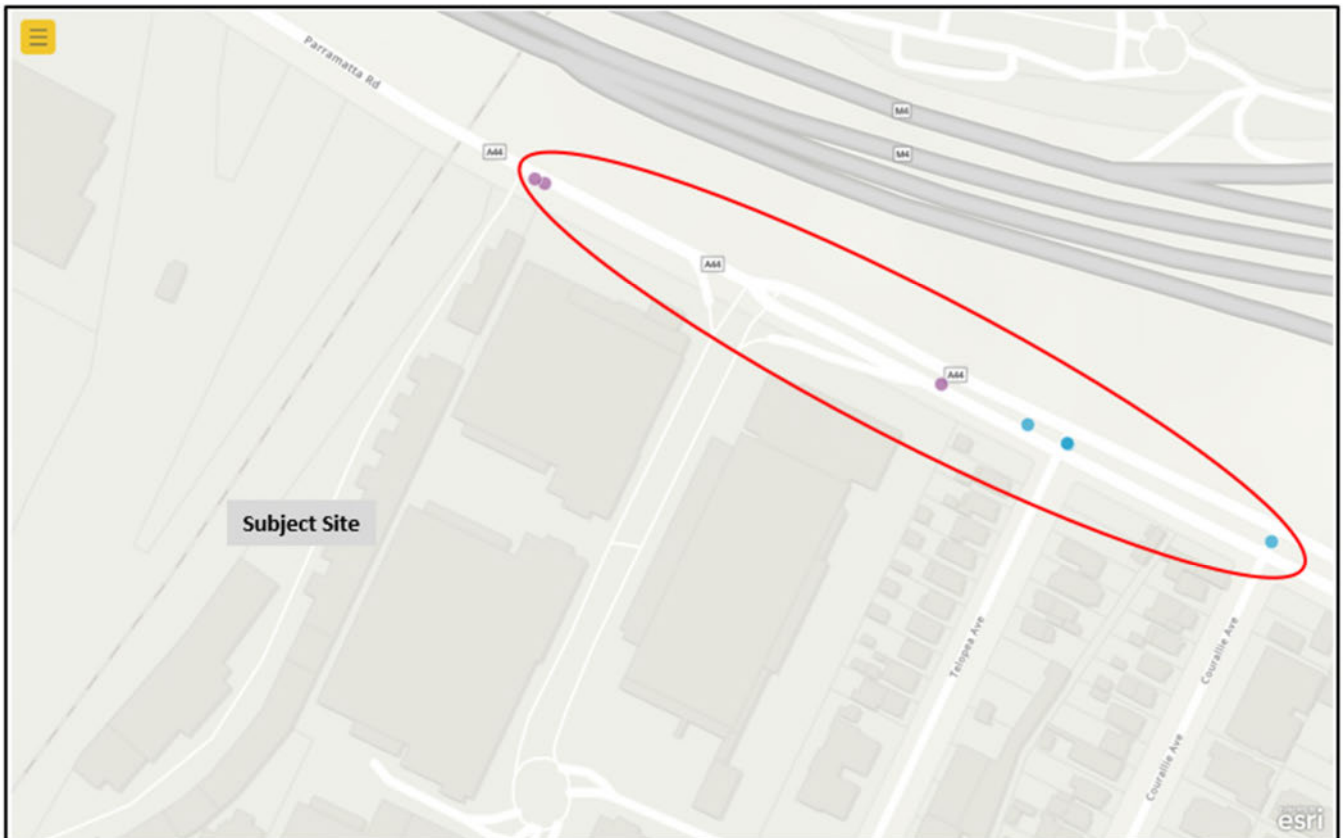


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

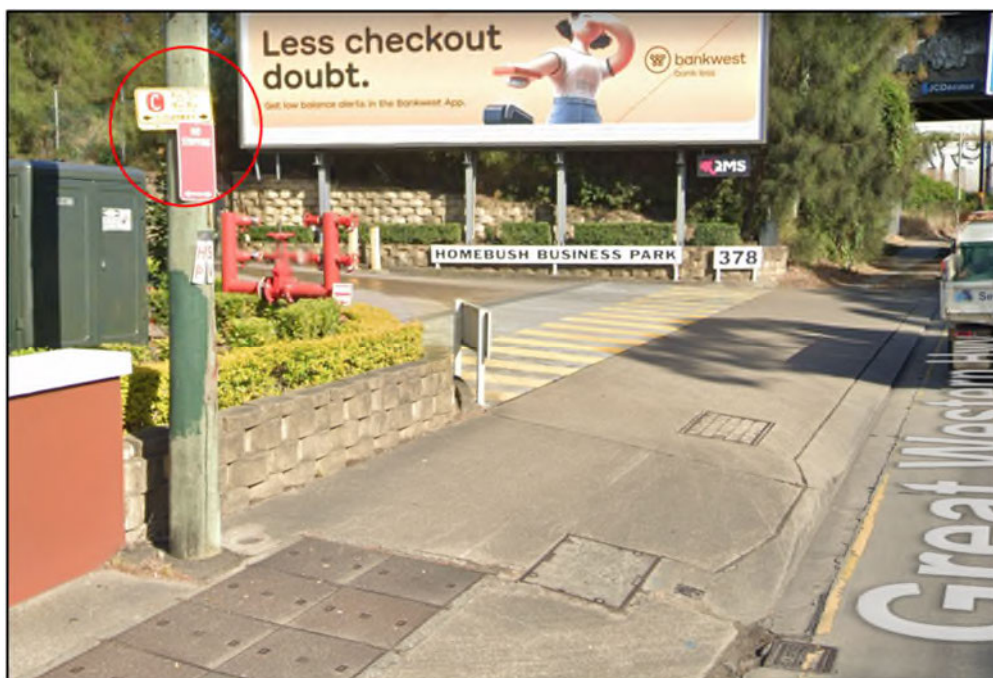


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**



## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				65	63
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.



## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 12:39:51 PM

---

Submitted on Tue, 27/08/2024 - 12:39

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Concord 2137

**Please provide your view on the project**

I support it

### **Submission**

North side of Strathfield station has been neglected by Canada Bay Council when neighbouring Burwood and Strathfield councils had seen developments. This is an opportunity to increase housing and vitalise western end of Everton Road. Rezoning Everton/Moseley/Cooper triangle to B4 mix use will allow sorely needed super market, daycare and agecare facilities. Commercial premises along Everton Road will not affect residential environment of the area. This will also create employment opportunities. Hopefully the 2016 Greater Sydney PRCUT proposal of 12 to 16 storey B4 rezoning for the triangle will be implemented.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 3:48:17 PM

---

Submitted on Tue, 27/08/2024 - 15:48

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

John

**Last name**

Bassingthwaighte

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I object to it

**Submission**

I actually support it, but I want to make sure feedback is not dismissed:

1.) The precinct boundary means that the southern side of Parramatta Rd (covering Homebush and Strathfield suburbs) is essentially neglected from development - and based on the plans, there is no effort to increase connectivity between these areas. The plan should include making the TOD much more accessible to residents living to the south of the Parramatta Road - for example: extending the Allen Street Reserve to cross the southern side - or building bridges over the railway line / Parramatta road for better connectivity.

2.) Homebush railway station is currently less utilised than it could be, as many local residents leaving nearby choose to walk to Strathfield to catch express services to the City or Parramatta. With a proposal to increase residences around Homebush station, no effort

has been made to make this station more effective (e.g. working with Transport for NSW to offer more frequent and express services). Otherwise the station would continue to be underutilised as residents would prefer to travel further to catch express services e.g. North Strathfield Metro.

3.) The Parramatta Road is already overloaded with traffic - ordinary residents would choose to travel via this road instead of paying the overpriced toll fees on the WestConnex. The plan does not clearly outline how this will handle the additional 40,000 residents moving into the area?

4.) As a general note, the State government has a duty to scrutinise property developers. It has failed miserably to oversee the residential building construction industry during the last 20 years and it has led to disastrous results. The TOD should focus on the long-term and every assurance must be made that quality standards are being met and the precinct is built to last.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 7:15:10 PM  
**Attachments:** [tod-rezoning-email.docx](#)

---

Submitted on Tue, 27/08/2024 - 19:13

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I object to it

**Submission file**

[tod-rezoning-email.docx](#) (14.6 KB)

**Submission**

Dear NSW Department of Planning, Housing and Infrastructure,

I am writing to formally express my concerns regarding the potential heritage listing of my property, [REDACTED] in the context of the Homebush State-Led Rezoning Transport Oriented Development (TOD) Precinct. While I recognize the importance of preserving historically significant structures, I believe that the heritage designation of this building is neither justified nor practical and would impose severe financial and developmental hardships on the owners.



Below, I outline the reasons for my concerns, supported by relevant laws, case studies, and policies, to illustrate the potential impact of this heritage listing.

#### Small Strata with Limited Financial Means

As a small strata, our financial resources are limited, making it exceedingly difficult to maintain the building in accordance with heritage regulations. The NSW Heritage Act 1977 mandates that the economic impact on property owners be considered when imposing heritage listings. In *Tenacity Consulting v Warringah Council* (2004), the Land and Environment Court emphasized the need to balance heritage conservation with the financial realities of the owners. Our strata's financial capacity is insufficient to bear the additional costs of heritage compliance, such as expensive repairs and restoration work.

#### Owners' Limited Financial Capacity to Maintain the Building

The financial limitations of our strata are a significant concern. The Strathfield Council Local Environmental Plan 2012 (LEP 2012) highlights the importance of considering the financial capacity of property owners when imposing heritage restrictions. In *Helou v Strathfield Municipal Council* (2006), the court reversed a heritage listing decision partly because it would impose undue financial strain on the property owners. The [REDACTED] already exhibits signs of age and wear, and the added burden of complying with heritage regulations would be untenable.

#### Substantial Signs of Age and Wear & Tear

The building at [REDACTED] is in a state of significant deterioration, with noticeable signs of age and wear. According to the NSW Heritage Manual, buildings proposed for heritage listing must be in a condition that justifies preservation. In *South Steyne Hotel Pty Ltd v Sydney City Council* (1987), the court ruled that only buildings with clear historical significance and adequate structural integrity should be heritage-listed. The current condition of [REDACTED] does not support a heritage designation, as it lacks both historical distinction and structural soundness.

#### Inconsistency in Heritage Listing

If [REDACTED] is to be heritage-listed, then it is crucial that [REDACTED], which is also under consideration, be similarly designated. Both buildings share similar architectural characteristics and historical backgrounds. The NSW Heritage Council guidelines emphasize the need for consistency in heritage listings to avoid arbitrary decisions. If [REDACTED] is not listed, then [REDACTED] should also not be listed to maintain fairness and consistency.

#### Key Development Site

Both [REDACTED] and [REDACTED] are part of a key development site identified in the Homebush State-Led Rezoning TOD Precinct. Heritage listing these buildings would conflict with strategic development plans, including the construction of a 103-metre apartment tower with a Floor Space Ratio (FSR) of 5. The Strathfield Council Development Control Plan 2005 (DCP 2005) advocates for integrating heritage considerations with broader urban development objectives. Heritage listing would hinder planned development and be inconsistent with the long-term vision for the area.

#### Heritage Listing Would Create an Isolated Site

Designating [REDACTED] as a heritage site while surrounding buildings are slated for significant development would create an isolated and incongruent site. The NSW Heritage Office advises against listing buildings that will be isolated from the broader urban landscape, as this diminishes their historical and aesthetic significance. The proposed construction of a 103-metre apartment tower [REDACTED] would render these buildings out of place, further reducing any heritage value they might possess.

### Impact on Property Value and Development Potential

Heritage listing would significantly decrease the marketability of the property, deterring potential buyers interested in redevelopment opportunities. The restrictive nature of heritage regulations, coupled with the building's poor insulation (low R-value) and aging infrastructure, would reduce its appeal to developers. The Environmental Planning and Assessment Act 1979 (EP&A Act) requires that heritage considerations be integrated with broader economic and development strategies. Heritage listing of [REDACTED] would contradict the EP&A Act's intent by stifling development in a key growth area.

Given the substantial evidence and arguments presented, the proposed heritage listing of [REDACTED] Homebush, is neither justified nor practical. The financial, practical, and developmental implications are too severe to ignore. I respectfully request that the Department reconsider this proposal and allow the site to be integrated into the broader development plans for the area.

Please acknowledge receipt of this letter, and I look forward to your detailed response.

Regards,

[REDACTED]

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 7:20:06 PM

---

Submitted on Tue, 27/08/2024 - 19:19

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

██████

**Last name**

██████████

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

██

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I object to it

### Submission

Dear NSW Department of Planning, Housing and Infrastructure,

I am writing to formally express my concerns regarding the potential heritage listing of my property, ██████████ Knight Street, Homebush, in the context of the Homebush State-Led Rezoning Transport Oriented Development (TOD) Precinct. While I recognize the importance of preserving historically significant structures, I believe that the heritage designation of this building is neither justified nor practical and would impose severe financial and developmental hardships on the owners.

Below, I outline the reasons for my concerns, supported by relevant laws, case studies, and policies, to illustrate the potential impact of this heritage listing.

#### 1. Small Strata with Limited Financial Means

As a small strata, our financial resources are limited, making it exceedingly difficult to maintain the building in accordance with heritage regulations. The NSW Heritage Act

1977 mandates that the economic impact on property owners be considered when imposing heritage listings. In *Tenacity Consulting v Warringah Council* (2004), the Land and Environment Court emphasized the need to balance heritage conservation with the financial realities of the owners. Our strata's financial capacity is insufficient to bear the additional costs of heritage compliance, such as expensive repairs and restoration work.

## 2. Owners' Limited Financial Capacity to Maintain the Building

The financial limitations of our strata are a significant concern. The Strathfield Council Local Environmental Plan 2012 (LEP 2012) highlights the importance of considering the financial capacity of property owners when imposing heritage restrictions. In *Helou v Strathfield Municipal Council* (2006), the court reversed a heritage listing decision partly because it would impose undue financial strain on the property owners. The building at [REDACTED] Knight Street already exhibits signs of age and wear, and the added burden of complying with heritage regulations would be untenable.

## 3. Substantial Signs of Age and Wear & Tear

The building at [REDACTED] Knight Street is in a state of significant deterioration, with noticeable signs of age and wear. According to the NSW Heritage Manual, buildings proposed for heritage listing must be in a condition that justifies preservation. In *South Steyne Hotel Pty Ltd v Sydney City Council* (1987), the court ruled that only buildings with clear historical significance and adequate structural integrity should be heritage-listed. The current condition of [REDACTED] Knight Street does not support a heritage designation, as it lacks both historical distinction and structural soundness.

## 4. Inconsistency in Heritage Listing

If [REDACTED] Knight Street is to be heritage-listed, then it is crucial that [REDACTED] Knight Street, which is also under consideration, be similarly designated. Both buildings share similar architectural characteristics and historical backgrounds. The NSW Heritage Council guidelines emphasize the need for consistency in heritage listings to avoid arbitrary decisions. If [REDACTED] Knight Street is not listed, then [REDACTED] Knight Street should also not be listed to maintain fairness and consistency.

## 5. Key Development Site

Both [REDACTED] and [REDACTED] Knight Street are part of a key development site identified in the Homebush State-Led Rezoning TOD Precinct. Heritage listing these buildings would conflict with strategic development plans, including the construction of a 103-metre apartment tower with a Floor Space Ratio (FSR) of 5. The Strathfield Council Development Control Plan 2005 (DCP 2005) advocates for integrating heritage considerations with broader urban development objectives. Heritage listing would hinder planned development and be inconsistent with the long-term vision for the area.

## 6. Heritage Listing Would Create an Isolated Site

Designating [REDACTED] Knight Street as a heritage site while surrounding buildings are slated for significant development would create an isolated and incongruent site. The NSW Heritage Office advises against listing buildings that will be isolated from the broader urban landscape, as this diminishes their historical and aesthetic significance. The proposed construction of a 103-metre apartment tower behind [REDACTED] and [REDACTED] Knight Street would render these buildings out of place, further reducing any heritage value they might possess.

## 7. Impact on Property Value and Development Potential

Heritage listing would significantly decrease the marketability of the property, deterring potential buyers interested in redevelopment opportunities. The restrictive nature of heritage regulations, coupled with the building's poor insulation (low R-value) and aging infrastructure, would reduce its appeal to developers. The Environmental Planning and

Assessment Act 1979 (EP&A Act) requires that heritage considerations be integrated with broader economic and development strategies. Heritage listing of [REDACTED] Knight Street would contradict the EP&A Act's intent by stifling development in a key growth area.

Given the substantial evidence and arguments presented, the proposed heritage listing of [REDACTED] Knight Street, Homebush, is neither justified nor practical. The financial, practical, and developmental implications are too severe to ignore. I respectfully request that the Department reconsider this proposal and allow the site to be integrated into the broader development plans for the area.

Please acknowledge receipt of this letter, and I look forward to your detailed response.

Regards,

[REDACTED]

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 7:49:42 PM  
**Attachments:** [submission-to-nsw-planning.pdf](#)

---

Submitted on Tue, 27/08/2024 - 19:44

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Vincent

### **Last name**

Yu

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Homebush West 2140

### **Please provide your view on the project**

I am just providing comments

### **Submission file**

[submission-to-nsw-planning.pdf](#) (1.3 MB)

### **Submission**

I support the TOD but to reach the goal for affordable accommodation mandate, our submission will add jobs and infrastructure provision to the project.

### **I agree to the above statement**

Yes



Dear NSW Planning,

Owners Corporation of SP60097 at 378 Parramatta Road, Homebush West NSW 2140 engaged consultant and Think Planners to prepare the rezoning application for our campus one year ago. The transport report and survey report have been completed. The transport report written by MU Group Consulting states that 1000 apartments and 4000 square meters commercial could be built in our campus. Owners received the letter from Department of Planning, Housing and Infrastructure on 17 July 2024 when owners corporation is going to submit the rezoning application to Strathfield Council. We are frustrated after read the letter due to your plan only rezone the front of our land.

There is currently a severe housing shortage in Sydney. The high density residential buildings in your rezoning plan could be built after 10 years or 20 years. But our land is different, if you rezone our whole lot, 1000 apartments will be provided to the market quickly.

If you only rezone the front, the 1000 apartments couldn't be built quickly due to there is only one entrance and exit for the campus, we have to spend many years to rezone the back of campus.

Many high density residential buildings already existed on back side of campus. Could you please see below pages for detailed our land.

1. Submission written by Think Planners
2. Transport report written by MU Group Consulting.
3. Survey Report

It is much appreciated if you rezone our whole lot! Thank you.

Kind Regards

Owners of 378 Parramatta Road, Homebush West 2140

22 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL

### STRATA PLAN 60097

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

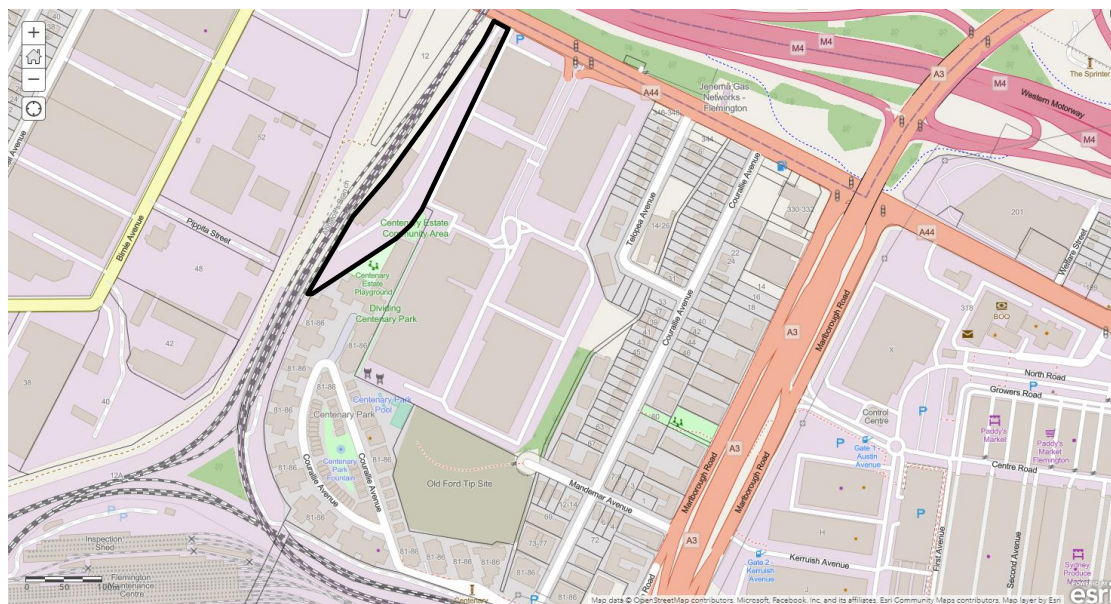


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary



- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

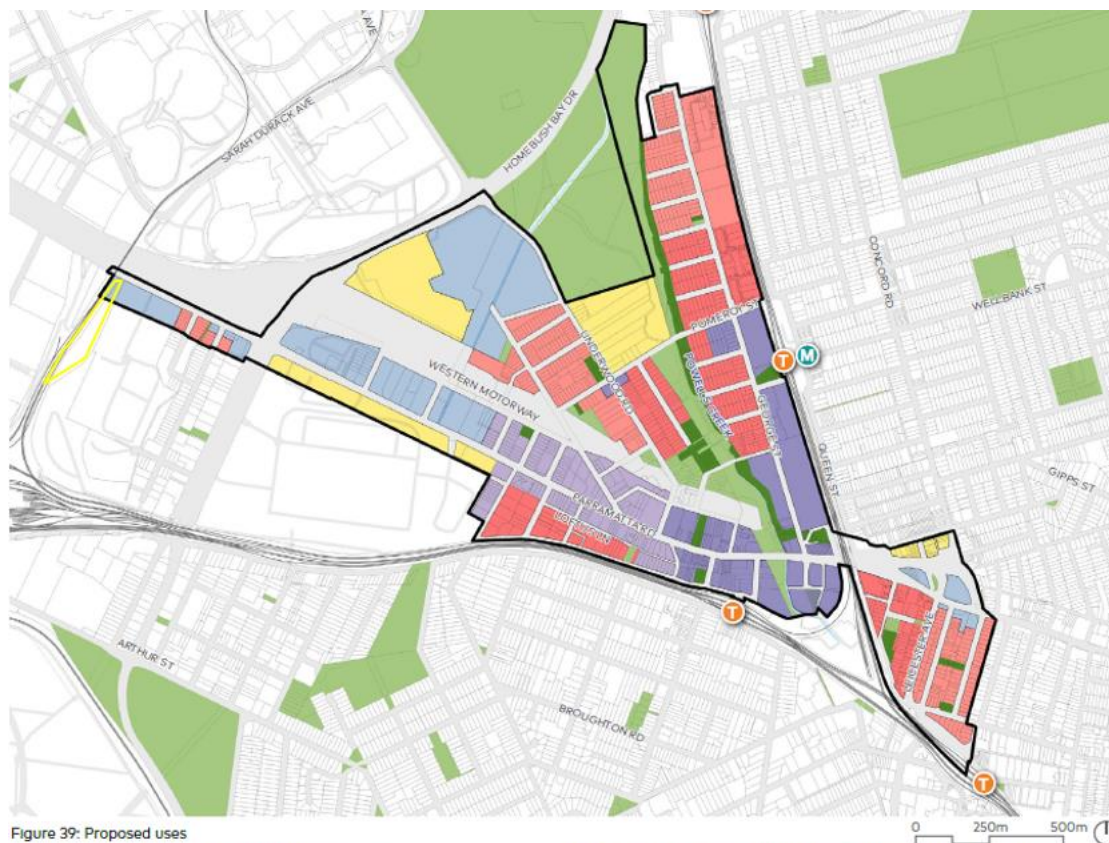


Figure 39: Proposed uses

■ Precinct Boundary   ■ Existing Open Space   ■ Special Activities + Markets   ■ Higher Density Residential  
 M Metro Station   ■ Proposed Open Space and Road network   ■ Higher Density Mixed Use   ■ Medium Density Residential  
 T Train Station   ■ Productivity Support and General Industrial   ■ Medium Density Mixed Use

Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.

## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimagined and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓

- *increase the amount of affordable housing in these locations* The subject land can contribute to affordable housing supply. ✓

## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
• <i>increase housing supply in the Precinct</i>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
• <i>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</i>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
• <i>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</i>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
• <i>increase the amount of affordable housing in the Precinct</i>	The subject land can contribute to affordable housing supply.	✓
• <i>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</i>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓



As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DHPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )



## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

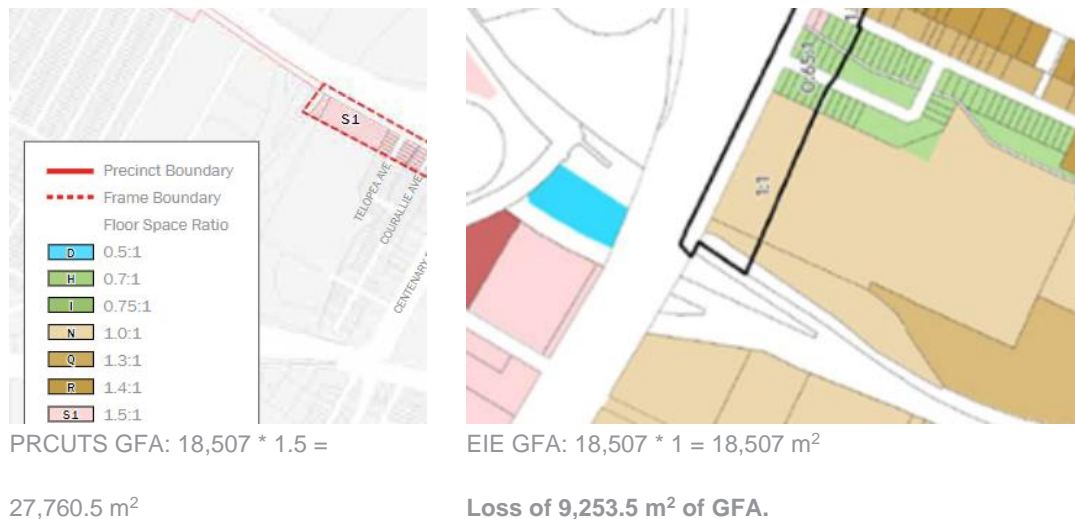


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government)

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

### A SPLIT PRECINCT AND LOT SIZE – AN IMPRACTICAL ARRANGEMENT

PRCUTs envisions over the subject site higher FSR and height than permitted in the current Strathfield Council LEP. As the subject land meets TOD and EIE objectives in terms of suitability for additional housing that is balanced with employment, the whole and not part of the site should be included in the precinct.

This is a practical consideration given the lot size proposed and also that the land is a strata landholding. The site is unable to be subdivided as it would not meet the minimum lot size requirements of the EIE shown in the adjacent map extract.

It is recommended that no minimum lot size applies to practically facilitate future subdivision that is aligned with the employment zone with the existing Homebush Precinct Area,



Figure 6 Proposed minimum lot size map extract (Source: NSW Government)

with the balance being rezoned R4 High Density Residential and no minimum lot size.

Redevelopment of the subject land in a manner consistent with its capacity should therefore be based on a consolidated precinct that includes all land, rather than an isolated fragment, which due to strata ownership and lot size restrictions, would prevent realisation of the government vision for more homes in TOD precincts.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.


Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.
- The minimum lot size map be amended to remove the lot size restriction.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the



recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on [REDACTED] or [REDACTED].

Ben Creighton  
Executive Planner  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: FINAL February 2023**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	J Diaz
1	13/02/2023	J Diaz	M Murphy	M Murphy



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## 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

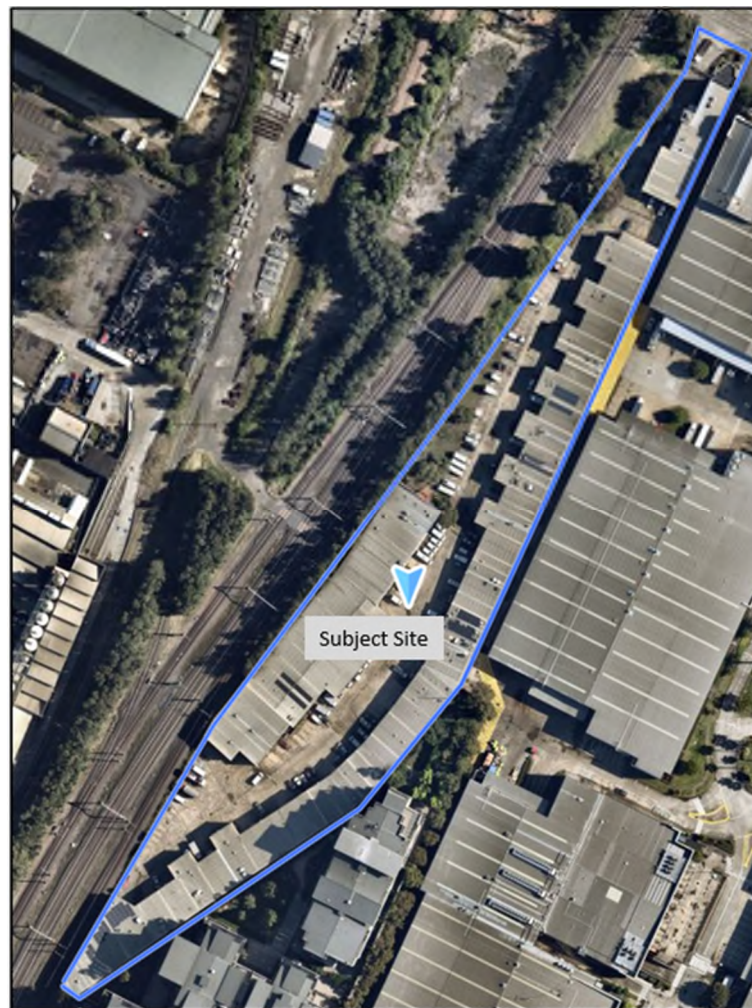


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

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#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
→ E	5,197	-	-
← W	5,570	-	-
→ E ← W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
→ E	6,067	-	-
← W	6,244	-	-
→ E ← W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW *"Guide to Traffic Generating Developments"* below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

TfNSW is understood to be planning additional bus services including new bus stops along Parramatta Road between Burwood and Auburn that may provide future services in this area.

### 5.2 RAIL SERVICE

There are four heavy rail stations near the subject site. The walking distance from each heavy rail station to the site are:

- Olympic Park Station – approximately 1.6km (21min) from the north,
- Flemington Station – approximately 2.0km (25min) from the southeast, and
- Lidcombe Station – approximately 2.7km (33min) from the southwest,
- Strathfield Station – approximately 3.7km (47min) from the east.

TfNSW is understood to be planning a future light rail connection from Parramatta to Sydney Olympic Park.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

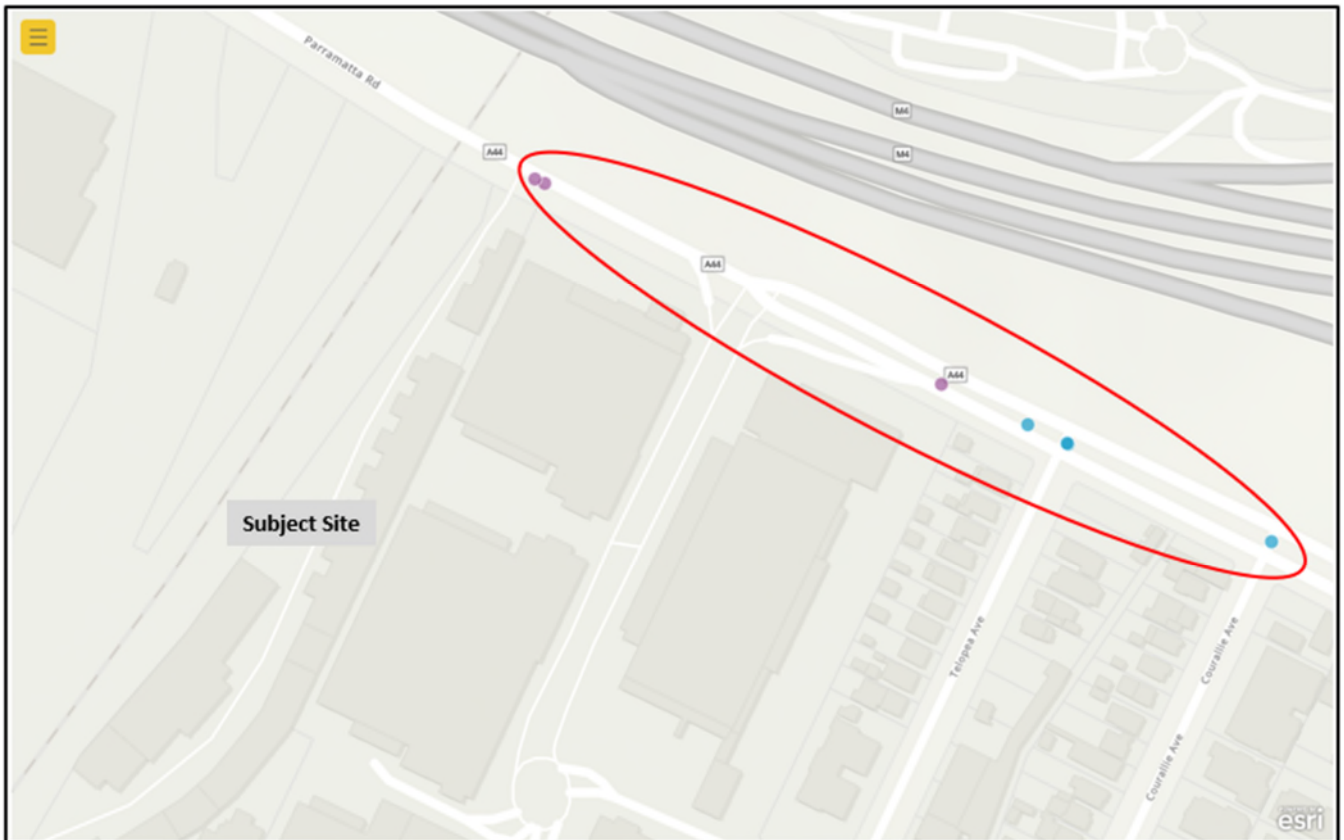


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.

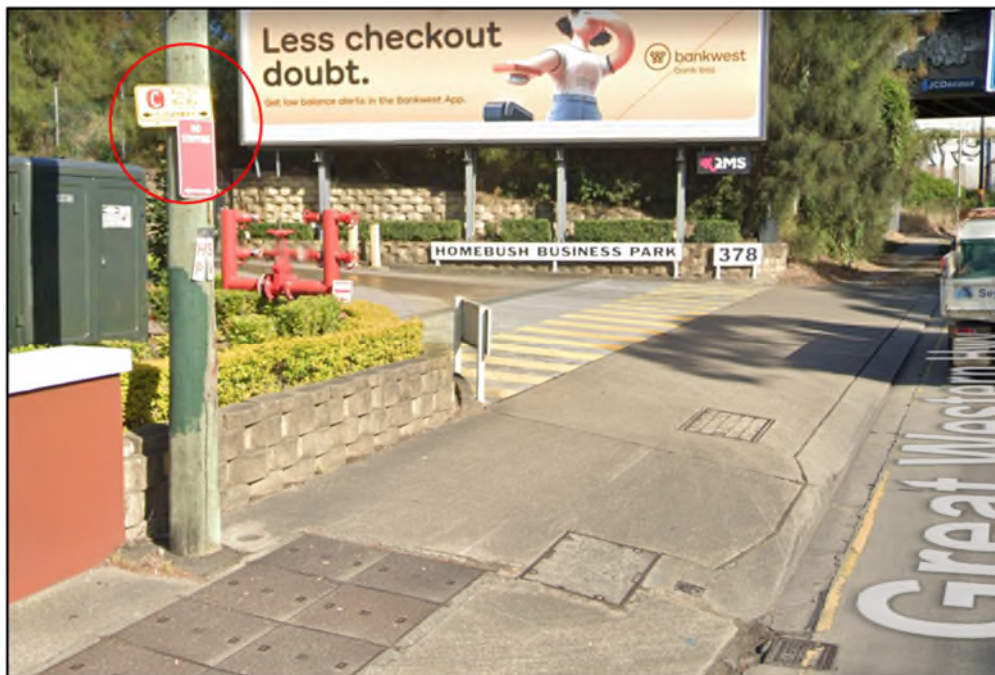


Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
				<b>Total</b>	<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 48 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m <sup>2</sup> )	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	8160 (170 x 48)	0.52/100m <sup>2</sup> GFA	0.56/100m <sup>2</sup> GFA	<b>42</b>	<b>46</b>
Office Space	1440 (30 x 48)	1.6/100m <sup>2</sup> GFA	1.2/100m <sup>2</sup> GFA	<b>23</b>	<b>17</b>
			<b>Total</b>	<b>65</b>	<b>63</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m<sup>2</sup> GLFA), 20% (10,000-30,000 m<sup>2</sup> GLFA) and 15% (over 30,000 m<sup>2</sup> GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				<b>65</b>	<b>63</b>
			<b>Total</b>	<b>89</b>	<b>71</b>

Table 5: Proposed Traffic Generation

As indicated in Table 5 above the total traffic generation for the proposed development will be 89 veh/hr in AM peak and 71 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.



## 8 SUMMARY

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In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 48 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 65 veh/hr in AM peak and 63 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 89 veh/hr in AM peak and 71 veh/hr in PM peak**, which is marginally higher in AM peak and PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 24 veh/hr in AM peak and 8 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

**SIGNATURE AND SEALS ONLY**

## PLAN FORM 2

16  
FENRITH  
OCTOBER 97

Seneca Manor



**Crown Lands Office Approval**

PLAN APPROVED .....

Land District .....

Paper No. ....

Field Book ..... 08

---

**Council's Certification**

(a) the requirements of the Local Gov

“(b) the requirements of † Part 3 Division

(Corporatisation) Act 1991.

have been compared with the appropriate

(insert new road, "subdivision" or "consolidation")

Date .....

(Signature) ..... General Manager/Author

Council File No. ....

a consolidated lot or the opening of a new road subdivided is wholly outside the areas not

Delete if inapplicable  
Board and the Miller Water Corporation Ltd

SURVEYOR'S REFERENCE: 55081/

[illegible]

**WARNING: CREASING OR FOLDING WILL LEAD TO REJECTION**

<p>Registered: <b>LS 6.10.1968</b></p> <p>UP <b>8/2004</b></p>	<p>C.A. _____</p> <p>Title System: <b>TORRENS</b></p> <p>Purpose: <b>CONSOLIDATION</b></p> <p>Ref Map: <b>U0045-22#</b></p> <p>Last Plan <b>DP216458, DP136656</b></p>	<p>PLAN OF CONSOLIDATION OF LOTS 1 &amp; 2 IN D.P. ELIAS <del>AND PART OF THE LAND</del> <del>CONTAINED IN DP136570</del> LOT 1 IN DP13656</p>	<p>Lengths are in metres. Reduction Ratio: 1:1000</p> <p>L.O.A.: <b>STRATHFIELD</b></p> <p>Suburb/Locality: <b>HOMEBUSH WEST</b></p> <p>Parish: <b>LIBERTY PLAINS</b></p> <p>County: <b>CUMBERLAND</b></p>	<p>THIS IS THE ONLY PLAN IN (Check if inapplicable)</p> <p>1 sheet</p> <p>CRISTOPHER C. ROBERTSON P.O. BOX 745, CANTER, TAS 7253</p> <p>A surveyor registered under the Surveyors Act 1969, hereby states and declares that the foregoing is a true and correct copy of the original as submitted to the Surveyors (General) Regulation 1968 and is accompanied by <b>6/9/97</b></p> <p>The survey is to: show the location and extent of the land to be surveyed and show the boundaries of the land to be surveyed and show the boundaries of the land to be surveyed and show the (Signatures) <b>C.C. Robertson</b> Dated this <b>1<sup>st</sup> JULY</b> Zinc Schooling Surveyor registered under the Surveyors Act 1969</p> <p>Plans used in preparation of survey/compilation DEPOSITED PLANS BOOKS 24, 431596, 235720, 214158, 185511, 165510</p> <p>PANEL FOR USE ONLY for statements of intention to dedicate public roads, to create public reserves, to create public parks, or to create public open spaces or use of land or positive covenants.</p>
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REGE 22

DP 872564

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 8:01:13 PM

---

Submitted on Tue, 27/08/2024 - 20:00

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Stanley

**Last name**

Ng

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush

**Please provide your view on the project**

I object to it

**Submission**

I live at [REDACTED], Homebush.

I object the following:-

1. Why is the rezoning of this property has less height restrictions than those on Underwood Road and Ismay Ave if State wishes to maximize population into this suburb?
2. Why is 1 Short Street Homebush listed as heritage when this house is beyond repair, falling into pieces, pests and rats infested. Not a unique look in any aspects as a hereditage house?!
- 3 Both 1 & 3 Short Street, Homebush should be zoned at least 12 storeys and higher

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 8:31:56 PM  
**Attachments:** [homebush-tod-rezoning-proposal-feedback-submission---27-aug-2024.docx](#)

---

Submitted on Tue, 27/08/2024 - 20:30

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

██████████

**Last name**

██████████

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

██

**Suburb/Town & Postcode**

North Strathfield

**Please provide your view on the project**

I object to it

**Submission file**

[homebush-tod-rezoning-proposal-feedback-submission---27-aug-2024.docx](#) (17.86 KB)

**Submission**

See uploaded file

**I agree to the above statement**

Yes

# Homebush TOD rezoning proposal

The below is feedback to the Homebush TOD rezoning proposal with a closing date of Friday, 30 August 2024. I am a resident of North Strathfield and have been an owner occupier of a unit for over 12 years. I have a young family and we have loved living in this area particularly with access to schooling, parks, amenities, sporting facilities and transport.

My family is not opposed to some reasonable redevelopment of this and neighbouring areas however the scale of the proposed rezoning and redevelopment is at odds with the wants and expectations of the local communities.

I have detailed below my objections and concerns with the rezoning proposal.

- With current residential density levels, during peak times George St, Pomeroy St and Underwood Rd all experiences sufficient congestion. A journey utilising these roads that should take 5 mins can take between 5 to 25 mins due to traffic congestion. With the proposed increased in residential and commercial density, these roads will experience sufficient increased levels of travel exacerbating an already congestion area.
- The addition of one new road off Pomeroy St is unlikely to alleviate the current and future traffic congestion.
- The proposed rezoning is concentrated on one side of the North Strathfield station which as not be explained or justified.
- All the proposed re-zoning is concentrated on the West side of North Strathfield train station with no proposed rezoning on the East side of station where there is an existing network of roads infrastructure which is lacking on the West side.
- The west side is only serviced by two main roads (George and Pomeroy) which if the re-zoning proceeds in its current form will lead to an unacceptable increase in traffic, noise, and pollution.
- The scale of the proposal feels more like the government trying to fulfil an election promise of creating 30,000 new homes than re-developing and enhancing the local area for the benefit of the community.
- The scale of the proposal rezoning, and development is not proportional to the wants and needs of the local community. In my interactions with the local community concerning the proposal, there is an acceptance that rezoning, and development is coming and warranted however the scale of high and medium density apartments is excessive and will destroy the character and heritage of the local area.
- The scale of the development will be at detrimental to the local area, community, and heritage of North Strathfield with increased traffic, noise, pollution, congestion, strain of local public services and infrastructure.

- The opening of a new transport station does not warrant or justify imposing multiple high-rise buildings on local community. Is see no consideration in any of the plans to accommodate the needs for more local services like policing, fire, health and schools.
- With the proposed increase of residents to the local area, this will put additional pressures on local council services leading to an increase in council rates adding to the already very high cost of living in Sydney.
- **Over the last 20 or more years the respective NSW governments have demonstrated their inability to properly regulate and govern the construction industry and particularly bad actors in the industry leading to defective apartment buildings that do not offer a habitable home or create value. Our community does not want more of the same defective high-rise housing that only benefits and profits the developers and not the community.**
- It is clear with the higher level of demand for houses over units, the public and this community does not want high rise apartments, produced on mass of a low quality that will not offer a desirable living standard.
- Low and medium rise buildings are more palatable to the community than high rise ghetto style apartment buildings that offer nothing to the local community other than the government delivering an election promise on housing numbers.
- No doubt the developers of the proposed high-rise apartments will promise “modern living spaces” which translates to minimum floor space, no kitchen islands, no storage spaces, and open floors plans. These are not what homeowners want. People do not eat out or order in everyday therefore people do need larger kitchens with adequate benchtop spaces. People do require storage for sports gear (Snow board, Ski gear, Golf Clubs, Tennis, Bikes), vacuum cleaners, Ironing board, Christmas Trees/ decorations, I could go on. The developers concerns and priorities are about minimising costs and maximising profits particularly in high rise apartments. The developers are enabled by inadequate government regulated building practices as mentioned earlier.
- Low quality product leading to expensive repair costs at the buyers expense. If for example, the developer installed the same low-quality fitting (pick one... door lock, intercom system, water proofing, cladding etc) and it is defective, it is normally the building unit owner who must foot the bill.
- Previous proposals to rezone areas around Concord West to medium density dwellings have been rejected due to flooding concerns yet this plan is looking to propose wholesale medium and high-density residential dwellings right across whole suburbs. Do those same flooding concerns now not apply to this proposal?
- The local community does not want North Strathfield to turn into another Zetland overrun with low quality Meriton Apartments.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 9:36:27 PM

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Submitted on Tue, 27/08/2024 - 21:35

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Parag

**Last name**

Yeole

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

**Submission**

I am writing to formally express our agreement with the proposed rezoning of Pomeroy Street, North Strathfield, NSW 2137 as outlined in the recent proposal. We believe that this rezoning will significantly benefit the community by enhancing infrastructure and providing more housing options.

However, we would like the Department to review the proposed Floor Space Index (FSI) . A section of properties on Pomeroy Street and Warsaw Street are proposed for Floor Space Index (FSI) of 3.2 whereas other properties are proposed for 2.8 FSI.

We would like to request that the Floor Space Index (FSI) be increased from the proposed 2.8 to 3.2 (or at least closer) to keep consistent for property owners on Pomeroy and Warsaw Street, North Strathfield.

We believe that this adjustment will allow for more efficient use of the available space and better meet the needs of the growing population in our area. An increased FSI will be beneficial to accommodate more residential units and provide additional amenities, thereby contributing to the overall development and sustainability of the community.

Some properties on both streets are nearly new construction including duplex and Increasing the FSI to 3.2 will also be an added incentive for those Property Owners to sell.

We appreciate the Government's efforts in planning and development and hope that our request will be given due consideration. We are confident that this adjustment will align with the Planning department's vision for the area and support the long-term goals of our community.

Thank you for your attention to this matter. We look forward to your positive response.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 10:19:10 PM  
**Attachments:** [homebush-tod-submission.docx](#)

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Submitted on Tue, 27/08/2024 - 22:17

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

██████████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

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**Email**

██

**Suburb/Town & Postcode**

Strathfield

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**Submission file**

[homebush-tod-submission.docx](#) (7.96 MB)

**Submission**

Please find attached my submission for the rezoning for Homebush and North Strathfield

**I agree to the above statement**

Yes

## **Introduction**

Sydney is undergoing a housing crisis, driven by a combination of rising rental costs, a shortage of affordable housing, and growing homelessness. The city's housing market is increasingly unaffordable for many, with rental prices increasing and a severe shortage of properties available at affordable levels for individuals and families.

Over the last 10 years, several planning proposals have been completed to reactivate and transform the suburbs of Homebush, North Strathfield and Strathfield (**Homebush Precinct**) from a derelict and dilapidated region with car yards and run-down shops into a vibrant, highly accessible and lifestyle orientated community. These plans have included the:

- Parramatta Road Corridor Urban Transformation Strategy;
- Greater Parramatta and Olympic Peninsula Planned Precinct;
- Burwood, Strathfield and Homebush Planned Precinct; and
- Canada Bay Council's Local Housing Strategy

While I fully support the principles of the Homebush Precinct Transport Orientated Development Urban Design Report (**TOD Homebush Report**), the development controls can be further increased to leverage the Homebush Precinct's unique geographical location in Sydney, along with its abundant transport infrastructure, parks and education services. There is one opportunity to create a masterplan for the entire Homebush Precinct to avoid hotch-potch or piecemeal developments that will hamper the revitalisation of these suburbs.

## **Infrastructure and Connectivity**

The Homebush Precinct is uniquely geographically positioned as it is located 12km west from the Sydney CBD, 2km south of Sydney Olympic Park and 10km east of Parramatta. Macquarie Park is located 10km to the north and Hurstville is located 13km to the south.

The Homebush Precinct is bounded by five existing train stations at Homebush, North Strathfield, Strathfield, Homebush West and Concord West. Through these train stations, residents can access multiple train lines, providing connections within Sydney in an eastern-western direction as well as a northern-southern direction. The only other stations that provide similar high connectivity are the Sydney and Parramatta CBD train stations. Figure 1 demonstrates the train lines accessible by the residents of the Homebush Precinct, and includes the following:

- T1 North Shore and Western line: providing rapid access to Richmond, Penrith, St Mary's, Blacktown, Parramatta, Burwood, Sydney CBD
- T2 Inner West line: providing access to Leppington, Liverpool, Parramatta and Sydney CBD
- T7 Olympic line: providing access to Sydney Olympic Park

- T9 Northern line: providing access to Hornsby, Epping, Sydney CBD, Chatswood
- T3 Lidcombe line is one stop away providing access to Liverpool, Bankstown and the Sydney CBD



**Figure 1: Sydney train lines illustrating the high connectivity of the Homebush Precinct**

Importantly, the government has invested \$25 billion to facilitate the construction of Sydney Metro West, with an upcoming North Strathfield Metro Station. This will further enhance the rail connectivity by providing rapid access to Parramatta CBD, Sydney Olympic Park, The Bays Precinct and Sydney CBD.

The Homebush Precinct is also highly connected to Sydney via major arterial roads, including the newly constructed WestConnex tunnels, M4 motorway, Parramatta Road and Homebush Bay Drive. The billions of dollars of government investment in infrastructure in the Homebush precinct has resulted in the Sydney CBD, Parramatta CBD and Macquarie Park being only 15 minutes by road making it the geographical centre between Sydney's three main central business districts.

Other attributes that make the Homebush Precinct ideal for urban renewal include:

- Education: a number of schools and universities preside within the region, such as Western Sydney University (Sydney Olympic Park campus) and Australian Catholic University in Strathfield.
- Access to large parks for residents, including Bicentennial Park, Bressington Park and Mason Park.

- Access to key retail precincts is available through the North Strathfield Bakehouse Quarter, DFO Homebush, Costco in Auburn, Strathfield Plaza, Burwood Westfield and Rhodes Waterside to name a few.
- Hospitals: Concord Hospital, Auburn Hospital and Strathfield Private Hospital are located within close proximity.
- Access to sporting and cultural events, including music concerts hosted by international artists, at Sydney Olympic Park.

### **Development Controls of Surrounding Suburbs**

The TOD Homebush Report proposes a FSR of 5:1 and height of 86m in Homebush and FSR of 3.2 and height of 52m in North Strathfield<sup>1</sup>. In table 1 below, I have provided the development controls of properties in surrounding suburbs.

<b>Suburb</b>	<b>Height</b>	<b>FSR</b>	<b>Address</b>
<b>Burwood</b>	70m	6:1	117 Burwood Rd, Burwood
<b>Strathfield</b>	55m	5:1	2 Pilgrim Avenue, Strathfield
<b>Lidcombe</b>	60m	5:1	40 Railway St, Lidcombe
<b>Auburn</b>	60m	5:1	1 Harrow Rd Auburn
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<b>Bankstown</b>	83m	8:1	74 Rickard Rd, Bankstown
<b>Hurstville</b>	60m	7:1	6 MacMahon St, Hurstville

**Table 1: planning controls of surrounding suburbs sourced from the NSW planning portal maps.**

Apart from Parramatta, none of the other suburbs outlined in Table 1 has the benefit of the amount of infrastructure, transportation options, parklands or connectivity to wider

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<sup>1</sup> A higher FSR of 4:1 is proposed in the area immediately adjacent to North Strathfield train station that is currently occupied by the MacDonald College and Our Lady of the Assumption Catholic Primary School. It is highly improbable that these educational sites will be demolished to increase housing supply.



Sydney than the Homebush Precinct. Yet, these suburbs have planning controls that provide more density than the Homebush Precinct. An analysis of the surrounding suburbs demonstrates the following:

1. The surrounding suburbs have similar or even higher planning controls to the proposed core of the Homebush Precinct despite its superior infrastructure and connectivity highlighted above. Suburbs like Granville, which has minimal infrastructure, has a superior FSR of 6:1 to that of the Homebush Precinct.
2. Suburbs that allow height limits of 80m or more have significantly higher FSRs (examples being Parramatta and Bankstown which provide an FSR of 10:1 and 8:1, respectively). This highlights the mismatch between the proposed heights and FSR in the suburb of Homebush, supporting an increase in FSR.
3. Suburbs that provide a similar FSR to the Homebush Precinct are doing so at significantly less heights. Lidcombe and Strathfield are providing the same FSR of 5:1 at heights of 60m and 55m while Epping, Burwood and Hurstville are delivering much higher FSRs in the height range of 60-72m. Again, this highlights the mismatch between the proposed heights and FSR in the suburb of Homebush supporting an increase in FSR.

## Recommendations

For these reasons, there are certain pockets of the Homebush Precinct that should have further densification than what is currently being outlined in the TOD Homebush proposal. I have outlined my suggestions as follows:

***Recommendation 1:*** increased densification of properties within ‘Sub-Precinct A,’ which is bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush



***Figure 2: properties located within in Sub-Precinct A bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush***

***PROPOSED:*** height of 86m with FSR of 5:1

***RECOMMENDED:*** height of 86m with FSR 7:1

Sub-Precinct A is located immediately adjacent to the existing Homebush train station and is proposed to be transitioned into a mixed-use precinct allowing for a variety of retail uses, supermarkets, childcare centres and medical services. Access to the M4 is within 100m and the WestConnex tunnels are approximately a 600m drive. This precinct is proposed to be rezoned allowing for a building height of 86m and FSR of 5:1

Properties in the areas surrounding Sub-Precinct A have the same proposed development controls of FSR 5:1. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct A due to the following:

- 2-4, 6, 8-10 and 12-14 Station St Homebush have already been developed into residential apartments at much lower densities than currently being proposed.
- 42-50, 52-58 and 102-110 Parramatta Rd have already been developed into residential apartments at much lower densities than currently being proposed.
- 17-35 Parramatta Rd Homebush has already been developed into residential apartments at much lower densities than currently being proposed.
- Nipper and Columbia Lane: properties have already been developed into residential apartments.
- 2 Parramatta Rd Homebush: current site of Kennards Hire Homebush, which is unlikely to change.
- 55-57 and 70 Parramatta Rd have heritage constraints. There are some considerations in heritage listing 7 and 11 Knight St Homebush in the TOD Homebush Report.

Based on the above, it is apparent that housing supply will continue to be very limited in the areas of the Homebush Precinct which are proposed to be re-zoned to an FSR of 5:1 by the TOD Homebush Report. Within the area being proposed for 5:1 FSR, housing supply will be limited to the properties in Sub-Precinct A only and it is, therefore, appropriate to provide further densification to these properties to cater for Sydney's growing population.

I note that there is an existing planning proposal for the properties located within Sub-Precinct A at 10-16 Loftus Crescent, 2 Subway Lane, 5 & 9-11 Knight Street and 88-92A Parramatta Road, Homebush, which has proposed an FSR of 7:1 and height of 86m. This planning proposal provides the correct balance in maximum permissible height and corresponding FSR and these planning controls should be extended throughout the whole Sub-Precinct A. This will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing Homebush train station to address the housing crisis;
- Lead the reactivation of Homebush into a vibrant, mixed used precinct;
- Leverage the Homebush Precinct's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families; and
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct A should have **an increase in FSR to 7:1**, whilst maintaining the proposed height of 86m.

**Recommendation 2:** increased densification of properties located within 'Sub-Precinct B,' which is bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush





**Figure 3: properties located within in Sub-Precinct B bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush**

***PROPOSED:*** height of 35-76m with FSR of 2.2-3.6:1

***RECOMMENDED:*** height of 76m with FSR 4:1

Building on the analysis provided in Recommendation 1, the properties located within Sub-Precinct B are also primed for further densification. These properties are located within 400m of Homebush train station and are crucial in not only providing further housing supply but also activating the core of the Homebush mixed-use precinct. There are limited barriers to development in Sub-Precinct B, with a sole existing residential flat building at 146-152 Parramatta Rd Homebush.

For this reason, **an increase in FSR to 4:1** would be more appropriate.

***Recommendation 3:*** increased densification of properties located within ‘Sub-Precinct C,’ which is bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield





**Figure 4: properties located within in Sub-Precinct B bounded by Pomeroy Ave, George St and Allen St, North Strathfield**

***PROPOSED:*** height of 42-52m with FSR of 3.2-3.5:1

***RECOMMENDED:*** height of 70m with FSR 6:1

Sub-Precinct C is located adjacent to the existing North Strathfield train station and the future North Strathfield Metro Station currently under construction. It is also immediately adjacent to the North Strathfield Bakehouse Quarter, which is proposed to function as the core retail precinct of the Homebush Precinct. Access to the M4 and WestConnex tunnels are approximately a 500m drive. The MacDonald College and Our Lady of the Assumption Catholic Primary School are educational facilities adjacent to Sub-Precinct C. Sub-Precinct C is proposed to be rezoned in part to mixed use zoning with a height of 52m and FSR of 3.5:1 while the rest is being rezoned to high density residential allowing a height of 42m and FSR of 3.2:1.

Land located immediately north of Sub-Precinct C have superior development controls proposed with an FSR of 4:1 and a height of 103m. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct C due to the following:

- 17 George St North Strathfield: has already been developed into the McDonald College
- 1A Hamilton St North Strathfield: has already been developed into Our Lady of the Assumption Catholic Primary School
- 2A Hamilton St North Strathfield: has already been developed into residential apartments at much lower densities than currently being proposed.

It is therefore clear, that virtually no housing supply will actually be supplied in the areas of the North Strathfield proposed to be rezoned to an FSR of 4:1, which was calculated to provide over 110,000sqm of residential GFA and approximately 6,000 of non-residential GFA in page 76 of the TOD Homebush Report.

Housing supply will be limited to those properties located within in Sub-Precinct C. Fortunately these properties are largely single storey, derelict houses that can be acquired for delivery of urgent housing and it is appropriate to provide further densification to these properties. The appropriate development controls would allow for an FSR to 6:1 with a height of 70m as it will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing North Strathfield train station and to the future North Strathfield Metro Station providing access to the Sydney, Parramatta and Sydney Olympic Park central business districts.
- Enhance the retail core of the Homebush Precinct being the North Strathfield Bakehouse Quarter
- Leverage the North Strathfield's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct C should have **an increase in FSR to 6:1 and maximum proposed height of 70m.**

**Recommendation 4:** Enable the 'Infill affordable housing provisions' throughout all Transport Orientated Development Precincts

The Infill affordable housing provisions was introduced in December 2023 to incentivise the development of affordable housing to address the ongoing housing crisis. The provision allows for a 30% increase in FSR and height limits where at least 15% of the



gross floor area of a development is used for affordable housing. The benefits of affordable housing are well known including social stability for low-income individuals and families, reducing the risk of homelessness; economic stability by reducing the burden of housing, residents can allocate more of their income toward other necessities; and stable and affordable housing is linked to better physical and mental health. Affordable housing allows for housing provisions to essential workers such as teachers, nurses and cleaners and therefore keeps driving the New South Wales economy.

I note there is a mandatory affordable housing contribution of between 5–10% for all new residential developments in the Homebush precinct, which is estimated to create between 805 and 1,610 affordable homes. However, if the infill affordable housing provisions were to apply to all of the Transport Orientated Development this will allow for a significant increase in the construction of affordable housing in all 8 of the accelerated precincts along with 37 suburbs where the new Transport Orientated Development planning controls apply.

I would, therefore, strongly urge for the **Infill Affordable Housing provisions to apply in all Transport Orientated Development regions** to allow for the creation of affordable housing that is urgently required in Sydney.

### **Summary**

In summation, to combat the housing crisis, I fully support the rezoning proposals outlined in the TOD Homebush Report, with the following amendments:

1. Increase densification of properties bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush to FRS 7:1 and maintain the height of 86m
2. Increased densification of properties bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush to FSR 4:1.
3. Increased densification of properties bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield to FSR 6:1 and height of 70m
4. To allow the principles of the 'Infill Affordable Housing Provisions' to facilitate the delivery of affordable housing.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 10:20:07 PM  
**Attachments:** [homebush-tod-submission.docx](#)

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Submitted on Tue, 27/08/2024 - 22:19

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

██

**Suburb/Town & Postcode**

Strathfield

**Please provide your view on the project**

I support it

**Submission file**

[homebush-tod-submission.docx](#) (7.96 MB)

**Submission**

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**I agree to the above statement**

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**Figure 1: Sydney train lines illustrating the high connectivity of the Homebush Precinct**

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**Table 1: planning controls of surrounding suburbs sourced from the NSW planning portal maps.**

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Sydney than the Homebush Precinct. Yet, these suburbs have planning controls that provide more density than the Homebush Precinct. An analysis of the surrounding suburbs demonstrates the following:

1. The surrounding suburbs have similar or even higher planning controls to the proposed core of the Homebush Precinct despite its superior infrastructure and connectivity highlighted above. Suburbs like Granville, which has minimal infrastructure, has a superior FSR of 6:1 to that of the Homebush Precinct.
2. Suburbs that allow height limits of 80m or more have significantly higher FSRs (examples being Parramatta and Bankstown which provide an FSR of 10:1 and 8:1, respectively). This highlights the mismatch between the proposed heights and FSR in the suburb of Homebush, supporting an increase in FSR.
3. Suburbs that provide a similar FSR to the Homebush Precinct are doing so at significantly less heights. Lidcombe and Strathfield are providing the same FSR of 5:1 at heights of 60m and 55m while Epping, Burwood and Hurstville are delivering much higher FSRs in the height range of 60-72m. Again, this highlights the mismatch between the proposed heights and FSR in the suburb of Homebush supporting an increase in FSR.



## Recommendations

For these reasons, there are certain pockets of the Homebush Precinct that should have further densification than what is currently being outlined in the TOD Homebush proposal. I have outlined my suggestions as follows:

***Recommendation 1:*** increased densification of properties within ‘Sub-Precinct A,’ which is bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush



***Figure 2: properties located within in Sub-Precinct A bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush***

***PROPOSED:*** height of 86m with FSR of 5:1

***RECOMMENDED:*** height of 86m with FSR 7:1

Sub-Precinct A is located immediately adjacent to the existing Homebush train station and is proposed to be transitioned into a mixed-use precinct allowing for a variety of retail uses, supermarkets, childcare centres and medical services. Access to the M4 is within 100m and the WestConnex tunnels are approximately a 600m drive. This precinct is proposed to be rezoned allowing for a building height of 86m and FSR of 5:1

Properties in the areas surrounding Sub-Precinct A have the same proposed development controls of FSR 5:1. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct A due to the following:

- 2-4, 6, 8-10 and 12-14 Station St Homebush have already been developed into residential apartments at much lower densities than currently being proposed.
- 42-50, 52-58 and 102-110 Parramatta Rd have already been developed into residential apartments at much lower densities than currently being proposed.
- 17-35 Parramatta Rd Homebush has already been developed into residential apartments at much lower densities than currently being proposed.
- Nipper and Columbia Lane: properties have already been developed into residential apartments.
- 2 Parramatta Rd Homebush: current site of Kennards Hire Homebush, which is unlikely to change.
- 55-57 and 70 Parramatta Rd have heritage constraints. There are some considerations in heritage listing 7 and 11 Knight St Homebush in the TOD Homebush Report.

Based on the above, it is apparent that housing supply will continue to be very limited in the areas of the Homebush Precinct which are proposed to be re-zoned to an FSR of 5:1 by the TOD Homebush Report. Within the area being proposed for 5:1 FSR, housing supply will be limited to the properties in Sub-Precinct A only and it is, therefore, appropriate to provide further densification to these properties to cater for Sydney's growing population.

I note that there is an existing planning proposal for the properties located within Sub-Precinct A at 10-16 Loftus Crescent, 2 Subway Lane, 5 & 9-11 Knight Street and 88-92A Parramatta Road, Homebush, which has proposed an FSR of 7:1 and height of 86m. This planning proposal provides the correct balance in maximum permissible height and corresponding FSR and these planning controls should be extended throughout the whole Sub-Precinct A. This will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing Homebush train station to address the housing crisis;
- Lead the reactivation of Homebush into a vibrant, mixed used precinct;
- Leverage the Homebush Precinct's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families; and
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct A should have **an increase in FSR to 7:1**, whilst maintaining the proposed height of 86m.

**Recommendation 2:** increased densification of properties located within 'Sub-Precinct B,' which is bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush





**Figure 3: properties located within in Sub-Precinct B bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush**

***PROPOSED:*** height of 35-76m with FSR of 2.2-3.6:1

***RECOMMENDED:*** height of 76m with FSR 4:1

Building on the analysis provided in Recommendation 1, the properties located within Sub-Precinct B are also primed for further densification. These properties are located within 400m of Homebush train station and are crucial in not only providing further housing supply but also activating the core of the Homebush mixed-use precinct. There are limited barriers to development in Sub-Precinct B, with a sole existing residential flat building at 146-152 Parramatta Rd Homebush.

For this reason, **an increase in FSR to 4:1** would be more appropriate.

***Recommendation 3:*** increased densification of properties located within ‘Sub-Precinct C,’ which is bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield





**Figure 4: properties located within in Sub-Precinct B bounded by Pomeroy Ave, George St and Allen St, North Strathfield**

***PROPOSED:*** height of 42-52m with FSR of 3.2-3.5:1

***RECOMMENDED:*** height of 70m with FSR 6:1

Sub-Precinct C is located adjacent to the existing North Strathfield train station and the future North Strathfield Metro Station currently under construction. It is also immediately adjacent to the North Strathfield Bakehouse Quarter, which is proposed to function as the core retail precinct of the Homebush Precinct. Access to the M4 and WestConnex tunnels are approximately a 500m drive. The MacDonald College and Our Lady of the Assumption Catholic Primary School are educational facilities adjacent to Sub-Precinct C. Sub-Precinct C is proposed to be rezoned in part to mixed use zoning with a height of 52m and FSR of 3.5:1 while the rest is being rezoned to high density residential allowing a height of 42m and FSR of 3.2:1.

Land located immediately north of Sub-Precinct C have superior development controls proposed with an FSR of 4:1 and a height of 103m. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct C due to the following:

- 17 George St North Strathfield: has already been developed into the McDonald College
- 1A Hamilton St North Strathfield: has already been developed into Our Lady of the Assumption Catholic Primary School
- 2A Hamilton St North Strathfield: has already been developed into residential apartments at much lower densities than currently being proposed.

It is therefore clear, that virtually no housing supply will actually be supplied in the areas of the North Strathfield proposed to be rezoned to an FSR of 4:1, which was calculated to provide over 110,000sqm of residential GFA and approximately 6,000 of non-residential GFA in page 76 of the TOD Homebush Report.

Housing supply will be limited to those properties located within in Sub-Precinct C. Fortunately these properties are largely single storey, derelict houses that can be acquired for delivery of urgent housing and it is appropriate to provide further densification to these properties. The appropriate development controls would allow for an FSR to 6:1 with a height of 70m as it will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing North Strathfield train station and to the future North Strathfield Metro Station providing access to the Sydney, Parramatta and Sydney Olympic Park central business districts.
- Enhance the retail core of the Homebush Precinct being the North Strathfield Bakehouse Quarter
- Leverage the North Strathfield's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct C should have **an increase in FSR to 6:1 and maximum proposed height of 70m.**

**Recommendation 4:** Enable the 'Infill affordable housing provisions' throughout all Transport Orientated Development Precincts

The Infill affordable housing provisions was introduced in December 2023 to incentivise the development of affordable housing to address the ongoing housing crisis. The provision allows for a 30% increase in FSR and height limits where at least 15% of the

gross floor area of a development is used for affordable housing. The benefits of affordable housing are well known including social stability for low-income individuals and families, reducing the risk of homelessness; economic stability by reducing the burden of housing, residents can allocate more of their income toward other necessities; and stable and affordable housing is linked to better physical and mental health. Affordable housing allows for housing provisions to essential workers such as teachers, nurses and cleaners and therefore keeps driving the New South Wales economy.

I note there is a mandatory affordable housing contribution of between 5–10% for all new residential developments in the Homebush precinct, which is estimated to create between 805 and 1,610 affordable homes. However, if the infill affordable housing provisions were to apply to all of the Transport Orientated Development this will allow for a significant increase in the construction of affordable housing in all 8 of the accelerated precincts along with 37 suburbs where the new Transport Orientated Development planning controls apply.

I would, therefore, strongly urge for the **Infill Affordable Housing provisions to apply in all Transport Orientated Development regions** to allow for the creation of affordable housing that is urgently required in Sydney.

### **Summary**

In summation, to combat the housing crisis, I fully support the rezoning proposals outlined in the TOD Homebush Report, with the following amendments:

1. Increase densification of properties bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush to FRS 7:1 and maintain the height of 86m
2. Increased densification of properties bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush to FSR 4:1.
3. Increased densification of properties bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield to FSR 6:1 and height of 70m
4. To allow the principles of the 'Infill Affordable Housing Provisions' to facilitate the delivery of affordable housing.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 10:21:08 PM  
**Attachments:** [homebush-tod-submission.docx](#)

---

Submitted on Tue, 27/08/2024 - 22:20

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

██████████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

██

**Suburb/Town & Postcode**

Strathfield

**Please provide your view on the project**

I support it

**Submission file**

[homebush-tod-submission.docx](#) (7.96 MB)

**Submission**

Please find attached my submission for the rezoning for Homebush and North Strathfield

**I agree to the above statement**

Yes

## **Introduction**

Sydney is undergoing a housing crisis, driven by a combination of rising rental costs, a shortage of affordable housing, and growing homelessness. The city's housing market is increasingly unaffordable for many, with rental prices increasing and a severe shortage of properties available at affordable levels for individuals and families.

Over the last 10 years, several planning proposals have been completed to reactivate and transform the suburbs of Homebush, North Strathfield and Strathfield (**Homebush Precinct**) from a derelict and dilapidated region with car yards and run-down shops into a vibrant, highly accessible and lifestyle orientated community. These plans have included the:

- Parramatta Road Corridor Urban Transformation Strategy;
- Greater Parramatta and Olympic Peninsula Planned Precinct;
- Burwood, Strathfield and Homebush Planned Precinct; and
- Canada Bay Council's Local Housing Strategy

While I fully support the principles of the Homebush Precinct Transport Orientated Development Urban Design Report (**TOD Homebush Report**), the development controls can be further increased to leverage the Homebush Precinct's unique geographical location in Sydney, along with its abundant transport infrastructure, parks and education services. There is one opportunity to create a masterplan for the entire Homebush Precinct to avoid hotch-potch or piecemeal developments that will hamper the revitalisation of these suburbs.

## **Infrastructure and Connectivity**

The Homebush Precinct is uniquely geographically positioned as it is located 12km west from the Sydney CBD, 2km south of Sydney Olympic Park and 10km east of Parramatta. Macquarie Park is located 10km to the north and Hurstville is located 13km to the south.

The Homebush Precinct is bounded by five existing train stations at Homebush, North Strathfield, Strathfield, Homebush West and Concord West. Through these train stations, residents can access multiple train lines, providing connections within Sydney in an eastern-western direction as well as a northern-southern direction. The only other stations that provide similar high connectivity are the Sydney and Parramatta CBD train stations. Figure 1 demonstrates the train lines accessible by the residents of the Homebush Precinct, and includes the following:

- T1 North Shore and Western line: providing rapid access to Richmond, Penrith, St Mary's, Blacktown, Parramatta, Burwood, Sydney CBD
- T2 Inner West line: providing access to Leppington, Liverpool, Parramatta and Sydney CBD
- T7 Olympic line: providing access to Sydney Olympic Park

- T9 Northern line: providing access to Hornsby, Epping, Sydney CBD, Chatswood
- T3 Lidcombe line is one stop away providing access to Liverpool, Bankstown and the Sydney CBD



**Figure 1: Sydney train lines illustrating the high connectivity of the Homebush Precinct**

Importantly, the government has invested \$25 billion to facilitate the construction of Sydney Metro West, with an upcoming North Strathfield Metro Station. This will further enhance the rail connectivity by providing rapid access to Parramatta CBD, Sydney Olympic Park, The Bays Precinct and Sydney CBD.

The Homebush Precinct is also highly connected to Sydney via major arterial roads, including the newly constructed WestConnex tunnels, M4 motorway, Parramatta Road and Homebush Bay Drive. The billions of dollars of government investment in infrastructure in the Homebush precinct has resulted in the Sydney CBD, Parramatta CBD and Macquarie Park being only 15 minutes by road making it the geographical centre between Sydney's three main central business districts.

Other attributes that make the Homebush Precinct ideal for urban renewal include:

- Education: a number of schools and universities preside within the region, such as Western Sydney University (Sydney Olympic Park campus) and Australian Catholic University in Strathfield.
- Access to large parks for residents, including Bicentennial Park, Bressington Park and Mason Park.

- Access to key retail precincts is available through the North Strathfield Bakehouse Quarter, DFO Homebush, Costco in Auburn, Strathfield Plaza, Burwood Westfield and Rhodes Waterside to name a few.
- Hospitals: Concord Hospital, Auburn Hospital and Strathfield Private Hospital are located within close proximity.
- Access to sporting and cultural events, including music concerts hosted by international artists, at Sydney Olympic Park.

### **Development Controls of Surrounding Suburbs**

The TOD Homebush Report proposes a FSR of 5:1 and height of 86m in Homebush and FSR of 3.2 and height of 52m in North Strathfield<sup>1</sup>. In table 1 below, I have provided the development controls of properties in surrounding suburbs.

<b>Suburb</b>	<b>Height</b>	<b>FSR</b>	<b>Address</b>
<b>Burwood</b>	70m	6:1	117 Burwood Rd, Burwood
<b>Strathfield</b>	55m	5:1	2 Pilgrim Avenue, Strathfield
<b>Lidcombe</b>	60m	5:1	40 Railway St, Lidcombe
<b>Auburn</b>	60m	5:1	1 Harrow Rd Auburn
<b>Granville</b>	52m	6:1	60 Cowper St, Granville
<b>Parramatta</b>	86m	10:1	2 Hassall St, Parramatta
<b>Rhodes</b>	66m	6:1	15 Blaxland Rd, Rhodes
<b>Epping</b>	72m	6:1	49 Beecroft Rd, Epping
<b>Bankstown</b>	83m	8:1	74 Rickard Rd, Bankstown
<b>Hurstville</b>	60m	7:1	6 MacMahon St, Hurstville

**Table 1: planning controls of surrounding suburbs sourced from the NSW planning portal maps.**

Apart from Parramatta, none of the other suburbs outlined in Table 1 has the benefit of the amount of infrastructure, transportation options, parklands or connectivity to wider

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<sup>1</sup> A higher FSR of 4:1 is proposed in the area immediately adjacent to North Strathfield train station that is currently occupied by the MacDonald College and Our Lady of the Assumption Catholic Primary School. It is highly improbable that these educational sites will be demolished to increase housing supply.

Sydney than the Homebush Precinct. Yet, these suburbs have planning controls that provide more density than the Homebush Precinct. An analysis of the surrounding suburbs demonstrates the following:

1. The surrounding suburbs have similar or even higher planning controls to the proposed core of the Homebush Precinct despite its superior infrastructure and connectivity highlighted above. Suburbs like Granville, which has minimal infrastructure, has a superior FSR of 6:1 to that of the Homebush Precinct.
2. Suburbs that allow height limits of 80m or more have significantly higher FSRs (examples being Parramatta and Bankstown which provide an FSR of 10:1 and 8:1, respectively). This highlights the mismatch between the proposed heights and FSR in the suburb of Homebush, supporting an increase in FSR.
3. Suburbs that provide a similar FSR to the Homebush Precinct are doing so at significantly less heights. Lidcombe and Strathfield are providing the same FSR of 5:1 at heights of 60m and 55m while Epping, Burwood and Hurstville are delivering much higher FSRs in the height range of 60-72m. Again, this highlights the mismatch between the proposed heights and FSR in the suburb of Homebush supporting an increase in FSR.

## Recommendations

For these reasons, there are certain pockets of the Homebush Precinct that should have further densification than what is currently being outlined in the TOD Homebush proposal. I have outlined my suggestions as follows:

***Recommendation 1:*** increased densification of properties within ‘Sub-Precinct A,’ which is bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush



***Figure 2: properties located within in Sub-Precinct A bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush***

***PROPOSED:*** height of 86m with FSR of 5:1

***RECOMMENDED:*** height of 86m with FSR 7:1

Sub-Precinct A is located immediately adjacent to the existing Homebush train station and is proposed to be transitioned into a mixed-use precinct allowing for a variety of retail uses, supermarkets, childcare centres and medical services. Access to the M4 is within 100m and the WestConnex tunnels are approximately a 600m drive. This precinct is proposed to be rezoned allowing for a building height of 86m and FSR of 5:1

Properties in the areas surrounding Sub-Precinct A have the same proposed development controls of FSR 5:1. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct A due to the following:



- 2-4, 6, 8-10 and 12-14 Station St Homebush have already been developed into residential apartments at much lower densities than currently being proposed.
- 42-50, 52-58 and 102-110 Parramatta Rd have already been developed into residential apartments at much lower densities than currently being proposed.
- 17-35 Parramatta Rd Homebush has already been developed into residential apartments at much lower densities than currently being proposed.
- Nipper and Columbia Lane: properties have already been developed into residential apartments.
- 2 Parramatta Rd Homebush: current site of Kennards Hire Homebush, which is unlikely to change.
- 55-57 and 70 Parramatta Rd have heritage constraints. There are some considerations in heritage listing 7 and 11 Knight St Homebush in the TOD Homebush Report.

Based on the above, it is apparent that housing supply will continue to be very limited in the areas of the Homebush Precinct which are proposed to be re-zoned to an FSR of 5:1 by the TOD Homebush Report. Within the area being proposed for 5:1 FSR, housing supply will be limited to the properties in Sub-Precinct A only and it is, therefore, appropriate to provide further densification to these properties to cater for Sydney's growing population.

I note that there is an existing planning proposal for the properties located within Sub-Precinct A at 10-16 Loftus Crescent, 2 Subway Lane, 5 & 9-11 Knight Street and 88-92A Parramatta Road, Homebush, which has proposed an FSR of 7:1 and height of 86m. This planning proposal provides the correct balance in maximum permissible height and corresponding FSR and these planning controls should be extended throughout the whole Sub-Precinct A. This will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing Homebush train station to address the housing crisis;
- Lead the reactivation of Homebush into a vibrant, mixed used precinct;
- Leverage the Homebush Precinct's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families; and
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct A should have **an increase in FSR to 7:1**, whilst maintaining the proposed height of 86m.

**Recommendation 2:** increased densification of properties located within 'Sub-Precinct B,' which is bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush



**Figure 3: properties located within in Sub-Precinct B bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush**

***PROPOSED:*** height of 35-76m with FSR of 2.2-3.6:1

***RECOMMENDED:*** height of 76m with FSR 4:1

Building on the analysis provided in Recommendation 1, the properties located within Sub-Precinct B are also primed for further densification. These properties are located within 400m of Homebush train station and are crucial in not only providing further housing supply but also activating the core of the Homebush mixed-use precinct. There are limited barriers to development in Sub-Precinct B, with a sole existing residential flat building at 146-152 Parramatta Rd Homebush.

For this reason, **an increase in FSR to 4:1** would be more appropriate.

***Recommendation 3:*** increased densification of properties located within ‘Sub-Precinct C,’ which is bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield





**Figure 4: properties located within in Sub-Precinct B bounded by Pomeroy Ave, George St and Allen St, North Strathfield**

***PROPOSED:*** height of 42-52m with FSR of 3.2-3.5:1

***RECOMMENDED:*** height of 70m with FSR 6:1

Sub-Precinct C is located adjacent to the existing North Strathfield train station and the future North Strathfield Metro Station currently under construction. It is also immediately adjacent to the North Strathfield Bakehouse Quarter, which is proposed to function as the core retail precinct of the Homebush Precinct. Access to the M4 and WestConnex tunnels are approximately a 500m drive. The MacDonald College and Our Lady of the Assumption Catholic Primary School are educational facilities adjacent to Sub-Precinct C. Sub-Precinct C is proposed to be rezoned in part to mixed use zoning with a height of 52m and FSR of 3.5:1 while the rest is being rezoned to high density residential allowing a height of 42m and FSR of 3.2:1.

Land located immediately north of Sub-Precinct C have superior development controls proposed with an FSR of 4:1 and a height of 103m. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct C due to the following:

- 17 George St North Strathfield: has already been developed into the McDonald College
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- 2A Hamilton St North Strathfield: has already been developed into residential apartments at much lower densities than currently being proposed.

It is therefore clear, that virtually no housing supply will actually be supplied in the areas of the North Strathfield proposed to be rezoned to an FSR of 4:1, which was calculated to provide over 110,000sqm of residential GFA and approximately 6,000 of non-residential GFA in page 76 of the TOD Homebush Report.

Housing supply will be limited to those properties located within in Sub-Precinct C. Fortunately these properties are largely single storey, derelict houses that can be acquired for delivery of urgent housing and it is appropriate to provide further densification to these properties. The appropriate development controls would allow for an FSR to 6:1 with a height of 70m as it will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing North Strathfield train station and to the future North Strathfield Metro Station providing access to the Sydney, Parramatta and Sydney Olympic Park central business districts.
- Enhance the retail core of the Homebush Precinct being the North Strathfield Bakehouse Quarter
- Leverage the North Strathfield's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct C should have **an increase in FSR to 6:1 and maximum proposed height of 70m.**

**Recommendation 4:** Enable the 'Infill affordable housing provisions' throughout all Transport Orientated Development Precincts

The Infill affordable housing provisions was introduced in December 2023 to incentivise the development of affordable housing to address the ongoing housing crisis. The provision allows for a 30% increase in FSR and height limits where at least 15% of the

gross floor area of a development is used for affordable housing. The benefits of affordable housing are well known including social stability for low-income individuals and families, reducing the risk of homelessness; economic stability by reducing the burden of housing, residents can allocate more of their income toward other necessities; and stable and affordable housing is linked to better physical and mental health. Affordable housing allows for housing provisions to essential workers such as teachers, nurses and cleaners and therefore keeps driving the New South Wales economy.

I note there is a mandatory affordable housing contribution of between 5–10% for all new residential developments in the Homebush precinct, which is estimated to create between 805 and 1,610 affordable homes. However, if the infill affordable housing provisions were to apply to all of the Transport Orientated Development this will allow for a significant increase in the construction of affordable housing in all 8 of the accelerated precincts along with 37 suburbs where the new Transport Orientated Development planning controls apply.

I would, therefore, strongly urge for the **Infill Affordable Housing provisions to apply in all Transport Orientated Development regions** to allow for the creation of affordable housing that is urgently required in Sydney.

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In summation, to combat the housing crisis, I fully support the rezoning proposals outlined in the TOD Homebush Report, with the following amendments:

1. Increase densification of properties bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush to FRS 7:1 and maintain the height of 86m
2. Increased densification of properties bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush to FSR 4:1.
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4. To allow the principles of the 'Infill Affordable Housing Provisions' to facilitate the delivery of affordable housing.

## **Introduction**

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## **Infrastructure and Connectivity**

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**Figure 1: Sydney train lines illustrating the high connectivity of the Homebush Precinct**

Importantly, the government has invested \$25 billion to facilitate the construction of Sydney Metro West, with an upcoming North Strathfield Metro Station. This will further enhance the rail connectivity by providing rapid access to Parramatta CBD, Sydney Olympic Park, The Bays Precinct and Sydney CBD.

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- Access to large parks for residents, including Bicentennial Park, Bressington Park and Mason Park.

- Access to key retail precincts is available through the North Strathfield Bakehouse Quarter, DFO Homebush, Costco in Auburn, Strathfield Plaza, Burwood Westfield and Rhodes Waterside to name a few.
- Hospitals: Concord Hospital, Auburn Hospital and Strathfield Private Hospital are located within close proximity.
- Access to sporting and cultural events, including music concerts hosted by international artists, at Sydney Olympic Park.

### **Development Controls of Surrounding Suburbs**

The TOD Homebush Report proposes a FSR of 5:1 and height of 86m in Homebush and FSR of 3.2 and height of 52m in North Strathfield<sup>1</sup>. In table 1 below, I have provided the development controls of properties in surrounding suburbs.

<b>Suburb</b>	<b>Height</b>	<b>FSR</b>	<b>Address</b>
<b>Burwood</b>	70m	6:1	117 Burwood Rd, Burwood
<b>Strathfield</b>	55m	5:1	2 Pilgrim Avenue, Strathfield
<b>Lidcombe</b>	60m	5:1	40 Railway St, Lidcombe
<b>Auburn</b>	60m	5:1	1 Harrow Rd Auburn
<b>Granville</b>	52m	6:1	60 Cowper St, Granville
<b>Parramatta</b>	86m	10:1	2 Hassall St, Parramatta
<b>Rhodes</b>	66m	6:1	15 Blaxland Rd, Rhodes
<b>Epping</b>	72m	6:1	49 Beecroft Rd, Epping
<b>Bankstown</b>	83m	8:1	74 Rickard Rd, Bankstown
<b>Hurstville</b>	60m	7:1	6 MacMahon St, Hurstville

**Table 1: planning controls of surrounding suburbs sourced from the NSW planning portal maps.**

Apart from Parramatta, none of the other suburbs outlined in Table 1 has the benefit of the amount of infrastructure, transportation options, parklands or connectivity to wider

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<sup>1</sup> A higher FSR of 4:1 is proposed in the area immediately adjacent to North Strathfield train station that is currently occupied by the MacDonald College and Our Lady of the Assumption Catholic Primary School. It is highly improbable that these educational sites will be demolished to increase housing supply.

Sydney than the Homebush Precinct. Yet, these suburbs have planning controls that provide more density than the Homebush Precinct. An analysis of the surrounding suburbs demonstrates the following:

1. The surrounding suburbs have similar or even higher planning controls to the proposed core of the Homebush Precinct despite its superior infrastructure and connectivity highlighted above. Suburbs like Granville, which has minimal infrastructure, has a superior FSR of 6:1 to that of the Homebush Precinct.
2. Suburbs that allow height limits of 80m or more have significantly higher FSRs (examples being Parramatta and Bankstown which provide an FSR of 10:1 and 8:1, respectively). This highlights the mismatch between the proposed heights and FSR in the suburb of Homebush, supporting an increase in FSR.
3. Suburbs that provide a similar FSR to the Homebush Precinct are doing so at significantly less heights. Lidcombe and Strathfield are providing the same FSR of 5:1 at heights of 60m and 55m while Epping, Burwood and Hurstville are delivering much higher FSRs in the height range of 60-72m. Again, this highlights the mismatch between the proposed heights and FSR in the suburb of Homebush supporting an increase in FSR.

## Recommendations

For these reasons, there are certain pockets of the Homebush Precinct that should have further densification than what is currently being outlined in the TOD Homebush proposal. I have outlined my suggestions as follows:

***Recommendation 1:*** increased densification of properties within ‘Sub-Precinct A,’ which is bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush



***Figure 2: properties located within in Sub-Precinct A bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush***

***PROPOSED:*** height of 86m with FSR of 5:1

***RECOMMENDED:*** height of 86m with FSR 7:1

Sub-Precinct A is located immediately adjacent to the existing Homebush train station and is proposed to be transitioned into a mixed-use precinct allowing for a variety of retail uses, supermarkets, childcare centres and medical services. Access to the M4 is within 100m and the WestConnex tunnels are approximately a 600m drive. This precinct is proposed to be rezoned allowing for a building height of 86m and FSR of 5:1

Properties in the areas surrounding Sub-Precinct A have the same proposed development controls of FSR 5:1. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct A due to the following:

- 2-4, 6, 8-10 and 12-14 Station St Homebush have already been developed into residential apartments at much lower densities than currently being proposed.
- 42-50, 52-58 and 102-110 Parramatta Rd have already been developed into residential apartments at much lower densities than currently being proposed.
- 17-35 Parramatta Rd Homebush has already been developed into residential apartments at much lower densities than currently being proposed.
- Nipper and Columbia Lane: properties have already been developed into residential apartments.
- 2 Parramatta Rd Homebush: current site of Kennards Hire Homebush, which is unlikely to change.
- 55-57 and 70 Parramatta Rd have heritage constraints. There are some considerations in heritage listing 7 and 11 Knight St Homebush in the TOD Homebush Report.

Based on the above, it is apparent that housing supply will continue to be very limited in the areas of the Homebush Precinct which are proposed to be re-zoned to an FSR of 5:1 by the TOD Homebush Report. Within the area being proposed for 5:1 FSR, housing supply will be limited to the properties in Sub-Precinct A only and it is, therefore, appropriate to provide further densification to these properties to cater for Sydney's growing population.

I note that there is an existing planning proposal for the properties located within Sub-Precinct A at 10-16 Loftus Crescent, 2 Subway Lane, 5 & 9-11 Knight Street and 88-92A Parramatta Road, Homebush, which has proposed an FSR of 7:1 and height of 86m. This planning proposal provides the correct balance in maximum permissible height and corresponding FSR and these planning controls should be extended throughout the whole Sub-Precinct A. This will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing Homebush train station to address the housing crisis;
- Lead the reactivation of Homebush into a vibrant, mixed used precinct;
- Leverage the Homebush Precinct's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families; and
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct A should have **an increase in FSR to 7:1**, whilst maintaining the proposed height of 86m.

**Recommendation 2:** increased densification of properties located within 'Sub-Precinct B,' which is bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush





**Figure 3: properties located within in Sub-Precinct B bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush**

***PROPOSED:*** height of 35-76m with FSR of 2.2-3.6:1

***RECOMMENDED:*** height of 76m with FSR 4:1

Building on the analysis provided in Recommendation 1, the properties located within Sub-Precinct B are also primed for further densification. These properties are located within 400m of Homebush train station and are crucial in not only providing further housing supply but also activating the core of the Homebush mixed-use precinct. There are limited barriers to development in Sub-Precinct B, with a sole existing residential flat building at 146-152 Parramatta Rd Homebush.

For this reason, **an increase in FSR to 4:1** would be more appropriate.

***Recommendation 3:*** increased densification of properties located within ‘Sub-Precinct C,’ which is bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield





**Figure 4: properties located within in Sub-Precinct B bounded by Pomeroy Ave, George St and Allen St, North Strathfield**

***PROPOSED:*** height of 42-52m with FSR of 3.2-3.5:1

***RECOMMENDED:*** height of 70m with FSR 6:1

Sub-Precinct C is located adjacent to the existing North Strathfield train station and the future North Strathfield Metro Station currently under construction. It is also immediately adjacent to the North Strathfield Bakehouse Quarter, which is proposed to function as the core retail precinct of the Homebush Precinct. Access to the M4 and WestConnex tunnels are approximately a 500m drive. The MacDonald College and Our Lady of the Assumption Catholic Primary School are educational facilities adjacent to Sub-Precinct C. Sub-Precinct C is proposed to be rezoned in part to mixed use zoning with a height of 52m and FSR of 3.5:1 while the rest is being rezoned to high density residential allowing a height of 42m and FSR of 3.2:1.

Land located immediately north of Sub-Precinct C have superior development controls proposed with an FSR of 4:1 and a height of 103m. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct C due to the following:

- 17 George St North Strathfield: has already been developed into the McDonald College
- 1A Hamilton St North Strathfield: has already been developed into Our Lady of the Assumption Catholic Primary School
- 2A Hamilton St North Strathfield: has already been developed into residential apartments at much lower densities than currently being proposed.

It is therefore clear, that virtually no housing supply will actually be supplied in the areas of the North Strathfield proposed to be rezoned to an FSR of 4:1, which was calculated to provide over 110,000sqm of residential GFA and approximately 6,000 of non-residential GFA in page 76 of the TOD Homebush Report.

Housing supply will be limited to those properties located within in Sub-Precinct C. Fortunately these properties are largely single storey, derelict houses that can be acquired for delivery of urgent housing and it is appropriate to provide further densification to these properties. The appropriate development controls would allow for an FSR to 6:1 with a height of 70m as it will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing North Strathfield train station and to the future North Strathfield Metro Station providing access to the Sydney, Parramatta and Sydney Olympic Park central business districts.
- Enhance the retail core of the Homebush Precinct being the North Strathfield Bakehouse Quarter
- Leverage the North Strathfield's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct C should have **an increase in FSR to 6:1 and maximum proposed height of 70m.**

**Recommendation 4:** Enable the 'Infill affordable housing provisions' throughout all Transport Orientated Development Precincts

The Infill affordable housing provisions was introduced in December 2023 to incentivise the development of affordable housing to address the ongoing housing crisis. The provision allows for a 30% increase in FSR and height limits where at least 15% of the

gross floor area of a development is used for affordable housing. The benefits of affordable housing are well known including social stability for low-income individuals and families, reducing the risk of homelessness; economic stability by reducing the burden of housing, residents can allocate more of their income toward other necessities; and stable and affordable housing is linked to better physical and mental health. Affordable housing allows for housing provisions to essential workers such as teachers, nurses and cleaners and therefore keeps driving the New South Wales economy.

I note there is a mandatory affordable housing contribution of between 5–10% for all new residential developments in the Homebush precinct, which is estimated to create between 805 and 1,610 affordable homes. However, if the infill affordable housing provisions were to apply to all of the Transport Orientated Development this will allow for a significant increase in the construction of affordable housing in all 8 of the accelerated precincts along with 37 suburbs where the new Transport Orientated Development planning controls apply.

I would, therefore, strongly urge for the **Infill Affordable Housing provisions to apply in all Transport Orientated Development regions** to allow for the creation of affordable housing that is urgently required in Sydney.

### **Summary**

In summation, to combat the housing crisis, I fully support the rezoning proposals outlined in the TOD Homebush Report, with the following amendments:

1. Increase densification of properties bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush to FRS 7:1 and maintain the height of 86m
2. Increased densification of properties bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush to FSR 4:1.
3. Increased densification of properties bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield to FSR 6:1 and height of 70m
4. To allow the principles of the 'Infill Affordable Housing Provisions' to facilitate the delivery of affordable housing.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 10:23:11 PM  
**Attachments:** [homebush-tod-submission.docx](#)

---

Submitted on Tue, 27/08/2024 - 22:22

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Strathfield

**Please provide your view on the project**

I support it

**Submission file**

[homebush-tod-submission.docx](#) (7.96 MB)

**Submission**

Please find attached my submission for the rezoning for Homebush and North Strathfield

**I agree to the above statement**

Yes

## **Introduction**

Sydney is undergoing a housing crisis, driven by a combination of rising rental costs, a shortage of affordable housing, and growing homelessness. The city's housing market is increasingly unaffordable for many, with rental prices increasing and a severe shortage of properties available at affordable levels for individuals and families.

Over the last 10 years, several planning proposals have been completed to reactivate and transform the suburbs of Homebush, North Strathfield and Strathfield (**Homebush Precinct**) from a derelict and dilapidated region with car yards and run-down shops into a vibrant, highly accessible and lifestyle orientated community. These plans have included the:

- Parramatta Road Corridor Urban Transformation Strategy;
- Greater Parramatta and Olympic Peninsula Planned Precinct;
- Burwood, Strathfield and Homebush Planned Precinct; and
- Canada Bay Council's Local Housing Strategy

While I fully support the principles of the Homebush Precinct Transport Orientated Development Urban Design Report (**TOD Homebush Report**), the development controls can be further increased to leverage the Homebush Precinct's unique geographical location in Sydney, along with its abundant transport infrastructure, parks and education services. There is one opportunity to create a masterplan for the entire Homebush Precinct to avoid hotch-potch or piecemeal developments that will hamper the revitalisation of these suburbs.

## **Infrastructure and Connectivity**

The Homebush Precinct is uniquely geographically positioned as it is located 12km west from the Sydney CBD, 2km south of Sydney Olympic Park and 10km east of Parramatta. Macquarie Park is located 10km to the north and Hurstville is located 13km to the south.

The Homebush Precinct is bounded by five existing train stations at Homebush, North Strathfield, Strathfield, Homebush West and Concord West. Through these train stations, residents can access multiple train lines, providing connections within Sydney in an eastern-western direction as well as a northern-southern direction. The only other stations that provide similar high connectivity are the Sydney and Parramatta CBD train stations. Figure 1 demonstrates the train lines accessible by the residents of the Homebush Precinct, and includes the following:

- T1 North Shore and Western line: providing rapid access to Richmond, Penrith, St Mary's, Blacktown, Parramatta, Burwood, Sydney CBD
- T2 Inner West line: providing access to Leppington, Liverpool, Parramatta and Sydney CBD
- T7 Olympic line: providing access to Sydney Olympic Park



- T9 Northern line: providing access to Hornsby, Epping, Sydney CBD, Chatswood
- T3 Lidcombe line is one stop away providing access to Liverpool, Bankstown and the Sydney CBD



**Figure 1: Sydney train lines illustrating the high connectivity of the Homebush Precinct**

Importantly, the government has invested \$25 billion to facilitate the construction of Sydney Metro West, with an upcoming North Strathfield Metro Station. This will further enhance the rail connectivity by providing rapid access to Parramatta CBD, Sydney Olympic Park, The Bays Precinct and Sydney CBD.

The Homebush Precinct is also highly connected to Sydney via major arterial roads, including the newly constructed WestConnex tunnels, M4 motorway, Parramatta Road and Homebush Bay Drive. The billions of dollars of government investment in infrastructure in the Homebush precinct has resulted in the Sydney CBD, Parramatta CBD and Macquarie Park being only 15 minutes by road making it the geographical centre between Sydney's three main central business districts.

Other attributes that make the Homebush Precinct ideal for urban renewal include:

- Education: a number of schools and universities preside within the region, such as Western Sydney University (Sydney Olympic Park campus) and Australian Catholic University in Strathfield.
- Access to large parks for residents, including Bicentennial Park, Bressington Park and Mason Park.



- Access to key retail precincts is available through the North Strathfield Bakehouse Quarter, DFO Homebush, Costco in Auburn, Strathfield Plaza, Burwood Westfield and Rhodes Waterside to name a few.
- Hospitals: Concord Hospital, Auburn Hospital and Strathfield Private Hospital are located within close proximity.
- Access to sporting and cultural events, including music concerts hosted by international artists, at Sydney Olympic Park.

### **Development Controls of Surrounding Suburbs**

The TOD Homebush Report proposes a FSR of 5:1 and height of 86m in Homebush and FSR of 3.2 and height of 52m in North Strathfield<sup>1</sup>. In table 1 below, I have provided the development controls of properties in surrounding suburbs.

<b>Suburb</b>	<b>Height</b>	<b>FSR</b>	<b>Address</b>
<b>Burwood</b>	70m	6:1	117 Burwood Rd, Burwood
<b>Strathfield</b>	55m	5:1	2 Pilgrim Avenue, Strathfield
<b>Lidcombe</b>	60m	5:1	40 Railway St, Lidcombe
<b>Auburn</b>	60m	5:1	1 Harrow Rd Auburn
<b>Granville</b>	52m	6:1	60 Cowper St, Granville
<b>Parramatta</b>	86m	10:1	2 Hassall St, Parramatta
<b>Rhodes</b>	66m	6:1	15 Blaxland Rd, Rhodes
<b>Epping</b>	72m	6:1	49 Beecroft Rd, Epping
<b>Bankstown</b>	83m	8:1	74 Rickard Rd, Bankstown
<b>Hurstville</b>	60m	7:1	6 MacMahon St, Hurstville

**Table 1: planning controls of surrounding suburbs sourced from the NSW planning portal maps.**

Apart from Parramatta, none of the other suburbs outlined in Table 1 has the benefit of the amount of infrastructure, transportation options, parklands or connectivity to wider

---

<sup>1</sup> A higher FSR of 4:1 is proposed in the area immediately adjacent to North Strathfield train station that is currently occupied by the MacDonald College and Our Lady of the Assumption Catholic Primary School. It is highly improbable that these educational sites will be demolished to increase housing supply.

Sydney than the Homebush Precinct. Yet, these suburbs have planning controls that provide more density than the Homebush Precinct. An analysis of the surrounding suburbs demonstrates the following:

1. The surrounding suburbs have similar or even higher planning controls to the proposed core of the Homebush Precinct despite its superior infrastructure and connectivity highlighted above. Suburbs like Granville, which has minimal infrastructure, has a superior FSR of 6:1 to that of the Homebush Precinct.
2. Suburbs that allow height limits of 80m or more have significantly higher FSRs (examples being Parramatta and Bankstown which provide an FSR of 10:1 and 8:1, respectively). This highlights the mismatch between the proposed heights and FSR in the suburb of Homebush, supporting an increase in FSR.
3. Suburbs that provide a similar FSR to the Homebush Precinct are doing so at significantly less heights. Lidcombe and Strathfield are providing the same FSR of 5:1 at heights of 60m and 55m while Epping, Burwood and Hurstville are delivering much higher FSRs in the height range of 60-72m. Again, this highlights the mismatch between the proposed heights and FSR in the suburb of Homebush supporting an increase in FSR.

## Recommendations

For these reasons, there are certain pockets of the Homebush Precinct that should have further densification than what is currently being outlined in the TOD Homebush proposal. I have outlined my suggestions as follows:

***Recommendation 1:*** increased densification of properties within ‘Sub-Precinct A,’ which is bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush



***Figure 2: properties located within in Sub-Precinct A bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush***

***PROPOSED:*** height of 86m with FSR of 5:1

***RECOMMENDED:*** height of 86m with FSR 7:1

Sub-Precinct A is located immediately adjacent to the existing Homebush train station and is proposed to be transitioned into a mixed-use precinct allowing for a variety of retail uses, supermarkets, childcare centres and medical services. Access to the M4 is within 100m and the WestConnex tunnels are approximately a 600m drive. This precinct is proposed to be rezoned allowing for a building height of 86m and FSR of 5:1

Properties in the areas surrounding Sub-Precinct A have the same proposed development controls of FSR 5:1. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct A due to the following:

- 2-4, 6, 8-10 and 12-14 Station St Homebush have already been developed into residential apartments at much lower densities than currently being proposed.
- 42-50, 52-58 and 102-110 Parramatta Rd have already been developed into residential apartments at much lower densities than currently being proposed.
- 17-35 Parramatta Rd Homebush has already been developed into residential apartments at much lower densities than currently being proposed.
- Nipper and Columbia Lane: properties have already been developed into residential apartments.
- 2 Parramatta Rd Homebush: current site of Kennards Hire Homebush, which is unlikely to change.
- 55-57 and 70 Parramatta Rd have heritage constraints. There are some considerations in heritage listing 7 and 11 Knight St Homebush in the TOD Homebush Report.

Based on the above, it is apparent that housing supply will continue to be very limited in the areas of the Homebush Precinct which are proposed to be re-zoned to an FSR of 5:1 by the TOD Homebush Report. Within the area being proposed for 5:1 FSR, housing supply will be limited to the properties in Sub-Precinct A only and it is, therefore, appropriate to provide further densification to these properties to cater for Sydney's growing population.

I note that there is an existing planning proposal for the properties located within Sub-Precinct A at 10-16 Loftus Crescent, 2 Subway Lane, 5 & 9-11 Knight Street and 88-92A Parramatta Road, Homebush, which has proposed an FSR of 7:1 and height of 86m. This planning proposal provides the correct balance in maximum permissible height and corresponding FSR and these planning controls should be extended throughout the whole Sub-Precinct A. This will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing Homebush train station to address the housing crisis;
- Lead the reactivation of Homebush into a vibrant, mixed used precinct;
- Leverage the Homebush Precinct's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families; and
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct A should have **an increase in FSR to 7:1**, whilst maintaining the proposed height of 86m.

**Recommendation 2:** increased densification of properties located within 'Sub-Precinct B,' which is bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush





**Figure 3: properties located within in Sub-Precinct B bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush**

***PROPOSED:*** height of 35-76m with FSR of 2.2-3.6:1

***RECOMMENDED:*** height of 76m with FSR 4:1

Building on the analysis provided in Recommendation 1, the properties located within Sub-Precinct B are also primed for further densification. These properties are located within 400m of Homebush train station and are crucial in not only providing further housing supply but also activating the core of the Homebush mixed-use precinct. There are limited barriers to development in Sub-Precinct B, with a sole existing residential flat building at 146-152 Parramatta Rd Homebush.

For this reason, **an increase in FSR to 4:1** would be more appropriate.

***Recommendation 3:*** increased densification of properties located within ‘Sub-Precinct C,’ which is bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield





**Figure 4: properties located within in Sub-Precinct B bounded by Pomeroy Ave, George St and Allen St, North Strathfield**

***PROPOSED:*** height of 42-52m with FSR of 3.2-3.5:1

***RECOMMENDED:*** height of 70m with FSR 6:1

Sub-Precinct C is located adjacent to the existing North Strathfield train station and the future North Strathfield Metro Station currently under construction. It is also immediately adjacent to the North Strathfield Bakehouse Quarter, which is proposed to function as the core retail precinct of the Homebush Precinct. Access to the M4 and WestConnex tunnels are approximately a 500m drive. The MacDonald College and Our Lady of the Assumption Catholic Primary School are educational facilities adjacent to Sub-Precinct C. Sub-Precinct C is proposed to be rezoned in part to mixed use zoning with a height of 52m and FSR of 3.5:1 while the rest is being rezoned to high density residential allowing a height of 42m and FSR of 3.2:1.



Land located immediately north of Sub-Precinct C have superior development controls proposed with an FSR of 4:1 and a height of 103m. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct C due to the following:

- 17 George St North Strathfield: has already been developed into the McDonald College
- 1A Hamilton St North Strathfield: has already been developed into Our Lady of the Assumption Catholic Primary School
- 2A Hamilton St North Strathfield: has already been developed into residential apartments at much lower densities than currently being proposed.

It is therefore clear, that virtually no housing supply will actually be supplied in the areas of the North Strathfield proposed to be rezoned to an FSR of 4:1, which was calculated to provide over 110,000sqm of residential GFA and approximately 6,000 of non-residential GFA in page 76 of the TOD Homebush Report.

Housing supply will be limited to those properties located within in Sub-Precinct C. Fortunately these properties are largely single storey, derelict houses that can be acquired for delivery of urgent housing and it is appropriate to provide further densification to these properties. The appropriate development controls would allow for an FSR to 6:1 with a height of 70m as it will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing North Strathfield train station and to the future North Strathfield Metro Station providing access to the Sydney, Parramatta and Sydney Olympic Park central business districts.
- Enhance the retail core of the Homebush Precinct being the North Strathfield Bakehouse Quarter
- Leverage the North Strathfield's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct C should have **an increase in FSR to 6:1 and maximum proposed height of 70m.**

**Recommendation 4:** Enable the 'Infill affordable housing provisions' throughout all Transport Orientated Development Precincts

The Infill affordable housing provisions was introduced in December 2023 to incentivise the development of affordable housing to address the ongoing housing crisis. The provision allows for a 30% increase in FSR and height limits where at least 15% of the

gross floor area of a development is used for affordable housing. The benefits of affordable housing are well known including social stability for low-income individuals and families, reducing the risk of homelessness; economic stability by reducing the burden of housing, residents can allocate more of their income toward other necessities; and stable and affordable housing is linked to better physical and mental health. Affordable housing allows for housing provisions to essential workers such as teachers, nurses and cleaners and therefore keeps driving the New South Wales economy.

I note there is a mandatory affordable housing contribution of between 5–10% for all new residential developments in the Homebush precinct, which is estimated to create between 805 and 1,610 affordable homes. However, if the infill affordable housing provisions were to apply to all of the Transport Orientated Development this will allow for a significant increase in the construction of affordable housing in all 8 of the accelerated precincts along with 37 suburbs where the new Transport Orientated Development planning controls apply.

I would, therefore, strongly urge for the **Infill Affordable Housing provisions to apply in all Transport Orientated Development regions** to allow for the creation of affordable housing that is urgently required in Sydney.

### **Summary**

In summation, to combat the housing crisis, I fully support the rezoning proposals outlined in the TOD Homebush Report, with the following amendments:

1. Increase densification of properties bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush to FRS 7:1 and maintain the height of 86m
2. Increased densification of properties bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush to FSR 4:1.
3. Increased densification of properties bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield to FSR 6:1 and height of 70m
4. To allow the principles of the 'Infill Affordable Housing Provisions' to facilitate the delivery of affordable housing.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Tuesday, 27 August 2024 10:24:27 PM  
**Attachments:** [homebush-tod-submission.docx](#)

---

Submitted on Tue, 27/08/2024 - 22:23

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Strathfield

**Please provide your view on the project**

I support it

**Submission file**

[homebush-tod-submission.docx](#) (7.96 MB)

**Submission**

Please find attached my submission for the rezoning for Homebush and North Strathfield

**I agree to the above statement**

Yes

## **Introduction**

Sydney is undergoing a housing crisis, driven by a combination of rising rental costs, a shortage of affordable housing, and growing homelessness. The city's housing market is increasingly unaffordable for many, with rental prices increasing and a severe shortage of properties available at affordable levels for individuals and families.

Over the last 10 years, several planning proposals have been completed to reactivate and transform the suburbs of Homebush, North Strathfield and Strathfield (**Homebush Precinct**) from a derelict and dilapidated region with car yards and run-down shops into a vibrant, highly accessible and lifestyle orientated community. These plans have included the:

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While I fully support the principles of the Homebush Precinct Transport Orientated Development Urban Design Report (**TOD Homebush Report**), the development controls can be further increased to leverage the Homebush Precinct's unique geographical location in Sydney, along with its abundant transport infrastructure, parks and education services. There is one opportunity to create a masterplan for the entire Homebush Precinct to avoid hotch-potch or piecemeal developments that will hamper the revitalisation of these suburbs.

## **Infrastructure and Connectivity**

The Homebush Precinct is uniquely geographically positioned as it is located 12km west from the Sydney CBD, 2km south of Sydney Olympic Park and 10km east of Parramatta. Macquarie Park is located 10km to the north and Hurstville is located 13km to the south.

The Homebush Precinct is bounded by five existing train stations at Homebush, North Strathfield, Strathfield, Homebush West and Concord West. Through these train stations, residents can access multiple train lines, providing connections within Sydney in an eastern-western direction as well as a northern-southern direction. The only other stations that provide similar high connectivity are the Sydney and Parramatta CBD train stations. Figure 1 demonstrates the train lines accessible by the residents of the Homebush Precinct, and includes the following:

- T1 North Shore and Western line: providing rapid access to Richmond, Penrith, St Mary's, Blacktown, Parramatta, Burwood, Sydney CBD
- T2 Inner West line: providing access to Leppington, Liverpool, Parramatta and Sydney CBD
- T7 Olympic line: providing access to Sydney Olympic Park

- T9 Northern line: providing access to Hornsby, Epping, Sydney CBD, Chatswood
- T3 Lidcombe line is one stop away providing access to Liverpool, Bankstown and the Sydney CBD



**Figure 1: Sydney train lines illustrating the high connectivity of the Homebush Precinct**

Importantly, the government has invested \$25 billion to facilitate the construction of Sydney Metro West, with an upcoming North Strathfield Metro Station. This will further enhance the rail connectivity by providing rapid access to Parramatta CBD, Sydney Olympic Park, The Bays Precinct and Sydney CBD.

The Homebush Precinct is also highly connected to Sydney via major arterial roads, including the newly constructed WestConnex tunnels, M4 motorway, Parramatta Road and Homebush Bay Drive. The billions of dollars of government investment in infrastructure in the Homebush precinct has resulted in the Sydney CBD, Parramatta CBD and Macquarie Park being only 15 minutes by road making it the geographical centre between Sydney's three main central business districts.

Other attributes that make the Homebush Precinct ideal for urban renewal include:

- Education: a number of schools and universities preside within the region, such as Western Sydney University (Sydney Olympic Park campus) and Australian Catholic University in Strathfield.
- Access to large parks for residents, including Bicentennial Park, Bressington Park and Mason Park.

- Access to key retail precincts is available through the North Strathfield Bakehouse Quarter, DFO Homebush, Costco in Auburn, Strathfield Plaza, Burwood Westfield and Rhodes Waterside to name a few.
- Hospitals: Concord Hospital, Auburn Hospital and Strathfield Private Hospital are located within close proximity.
- Access to sporting and cultural events, including music concerts hosted by international artists, at Sydney Olympic Park.

### **Development Controls of Surrounding Suburbs**

The TOD Homebush Report proposes a FSR of 5:1 and height of 86m in Homebush and FSR of 3.2 and height of 52m in North Strathfield<sup>1</sup>. In table 1 below, I have provided the development controls of properties in surrounding suburbs.

<b>Suburb</b>	<b>Height</b>	<b>FSR</b>	<b>Address</b>
<b>Burwood</b>	70m	6:1	117 Burwood Rd, Burwood
<b>Strathfield</b>	55m	5:1	2 Pilgrim Avenue, Strathfield
<b>Lidcombe</b>	60m	5:1	40 Railway St, Lidcombe
<b>Auburn</b>	60m	5:1	1 Harrow Rd Auburn
<b>Granville</b>	52m	6:1	60 Cowper St, Granville
<b>Parramatta</b>	86m	10:1	2 Hassall St, Parramatta
<b>Rhodes</b>	66m	6:1	15 Blaxland Rd, Rhodes
<b>Epping</b>	72m	6:1	49 Beecroft Rd, Epping
<b>Bankstown</b>	83m	8:1	74 Rickard Rd, Bankstown
<b>Hurstville</b>	60m	7:1	6 MacMahon St, Hurstville

**Table 1: planning controls of surrounding suburbs sourced from the NSW planning portal maps.**

Apart from Parramatta, none of the other suburbs outlined in Table 1 has the benefit of the amount of infrastructure, transportation options, parklands or connectivity to wider

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<sup>1</sup> A higher FSR of 4:1 is proposed in the area immediately adjacent to North Strathfield train station that is currently occupied by the MacDonald College and Our Lady of the Assumption Catholic Primary School. It is highly improbable that these educational sites will be demolished to increase housing supply.



Sydney than the Homebush Precinct. Yet, these suburbs have planning controls that provide more density than the Homebush Precinct. An analysis of the surrounding suburbs demonstrates the following:

1. The surrounding suburbs have similar or even higher planning controls to the proposed core of the Homebush Precinct despite its superior infrastructure and connectivity highlighted above. Suburbs like Granville, which has minimal infrastructure, has a superior FSR of 6:1 to that of the Homebush Precinct.
2. Suburbs that allow height limits of 80m or more have significantly higher FSRs (examples being Parramatta and Bankstown which provide an FSR of 10:1 and 8:1, respectively). This highlights the mismatch between the proposed heights and FSR in the suburb of Homebush, supporting an increase in FSR.
3. Suburbs that provide a similar FSR to the Homebush Precinct are doing so at significantly less heights. Lidcombe and Strathfield are providing the same FSR of 5:1 at heights of 60m and 55m while Epping, Burwood and Hurstville are delivering much higher FSRs in the height range of 60-72m. Again, this highlights the mismatch between the proposed heights and FSR in the suburb of Homebush supporting an increase in FSR.

## Recommendations

For these reasons, there are certain pockets of the Homebush Precinct that should have further densification than what is currently being outlined in the TOD Homebush proposal. I have outlined my suggestions as follows:

***Recommendation 1:*** increased densification of properties within ‘Sub-Precinct A,’ which is bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush



***Figure 2: properties located within in Sub-Precinct A bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush***

***PROPOSED:*** height of 86m with FSR of 5:1

***RECOMMENDED:*** height of 86m with FSR 7:1

Sub-Precinct A is located immediately adjacent to the existing Homebush train station and is proposed to be transitioned into a mixed-use precinct allowing for a variety of retail uses, supermarkets, childcare centres and medical services. Access to the M4 is within 100m and the WestConnex tunnels are approximately a 600m drive. This precinct is proposed to be rezoned allowing for a building height of 86m and FSR of 5:1

Properties in the areas surrounding Sub-Precinct A have the same proposed development controls of FSR 5:1. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct A due to the following:

- 2-4, 6, 8-10 and 12-14 Station St Homebush have already been developed into residential apartments at much lower densities than currently being proposed.
- 42-50, 52-58 and 102-110 Parramatta Rd have already been developed into residential apartments at much lower densities than currently being proposed.
- 17-35 Parramatta Rd Homebush has already been developed into residential apartments at much lower densities than currently being proposed.
- Nipper and Columbia Lane: properties have already been developed into residential apartments.
- 2 Parramatta Rd Homebush: current site of Kennards Hire Homebush, which is unlikely to change.
- 55-57 and 70 Parramatta Rd have heritage constraints. There are some considerations in heritage listing 7 and 11 Knight St Homebush in the TOD Homebush Report.

Based on the above, it is apparent that housing supply will continue to be very limited in the areas of the Homebush Precinct which are proposed to be re-zoned to an FSR of 5:1 by the TOD Homebush Report. Within the area being proposed for 5:1 FSR, housing supply will be limited to the properties in Sub-Precinct A only and it is, therefore, appropriate to provide further densification to these properties to cater for Sydney's growing population.

I note that there is an existing planning proposal for the properties located within Sub-Precinct A at 10-16 Loftus Crescent, 2 Subway Lane, 5 & 9-11 Knight Street and 88-92A Parramatta Road, Homebush, which has proposed an FSR of 7:1 and height of 86m. This planning proposal provides the correct balance in maximum permissible height and corresponding FSR and these planning controls should be extended throughout the whole Sub-Precinct A. This will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing Homebush train station to address the housing crisis;
- Lead the reactivation of Homebush into a vibrant, mixed used precinct;
- Leverage the Homebush Precinct's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families; and
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct A should have **an increase in FSR to 7:1**, whilst maintaining the proposed height of 86m.

**Recommendation 2:** increased densification of properties located within 'Sub-Precinct B,' which is bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush





**Figure 3: properties located within in Sub-Precinct B bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush**

***PROPOSED:*** height of 35-76m with FSR of 2.2-3.6:1

***RECOMMENDED:*** height of 76m with FSR 4:1

Building on the analysis provided in Recommendation 1, the properties located within Sub-Precinct B are also primed for further densification. These properties are located within 400m of Homebush train station and are crucial in not only providing further housing supply but also activating the core of the Homebush mixed-use precinct. There are limited barriers to development in Sub-Precinct B, with a sole existing residential flat building at 146-152 Parramatta Rd Homebush.

For this reason, **an increase in FSR to 4:1** would be more appropriate.

***Recommendation 3:*** increased densification of properties located within ‘Sub-Precinct C,’ which is bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield





**Figure 4: properties located within in Sub-Precinct B bounded by Pomeroy Ave, George St and Allen St, North Strathfield**

***PROPOSED:*** height of 42-52m with FSR of 3.2-3.5:1

***RECOMMENDED:*** height of 70m with FSR 6:1

Sub-Precinct C is located adjacent to the existing North Strathfield train station and the future North Strathfield Metro Station currently under construction. It is also immediately adjacent to the North Strathfield Bakehouse Quarter, which is proposed to function as the core retail precinct of the Homebush Precinct. Access to the M4 and WestConnex tunnels are approximately a 500m drive. The MacDonald College and Our Lady of the Assumption Catholic Primary School are educational facilities adjacent to Sub-Precinct C. Sub-Precinct C is proposed to be rezoned in part to mixed use zoning with a height of 52m and FSR of 3.5:1 while the rest is being rezoned to high density residential allowing a height of 42m and FSR of 3.2:1.

Land located immediately north of Sub-Precinct C have superior development controls proposed with an FSR of 4:1 and a height of 103m. However, an increase in housing supply is limited in the areas surrounding Sub-Precinct C due to the following:

- 17 George St North Strathfield: has already been developed into the McDonald College
- 1A Hamilton St North Strathfield: has already been developed into Our Lady of the Assumption Catholic Primary School
- 2A Hamilton St North Strathfield: has already been developed into residential apartments at much lower densities than currently being proposed.

It is therefore clear, that virtually no housing supply will actually be supplied in the areas of the North Strathfield proposed to be rezoned to an FSR of 4:1, which was calculated to provide over 110,000sqm of residential GFA and approximately 6,000 of non-residential GFA in page 76 of the TOD Homebush Report.

Housing supply will be limited to those properties located within in Sub-Precinct C. Fortunately these properties are largely single storey, derelict houses that can be acquired for delivery of urgent housing and it is appropriate to provide further densification to these properties. The appropriate development controls would allow for an FSR to 6:1 with a height of 70m as it will allow for:

- Delivering urgent housing supply to the region and adjacent to the existing North Strathfield train station and to the future North Strathfield Metro Station providing access to the Sydney, Parramatta and Sydney Olympic Park central business districts.
- Enhance the retail core of the Homebush Precinct being the North Strathfield Bakehouse Quarter
- Leverage the North Strathfield's unique geographical position in Sydney along with its abundance of transportation options and parklands highlighted above in providing accessible housing for families
- Providing planning controls similar to that of the surrounding suburbs.

Therefore, the properties located Sub-Precinct C should have **an increase in FSR to 6:1 and maximum proposed height of 70m.**

**Recommendation 4:** Enable the 'Infill affordable housing provisions' throughout all Transport Orientated Development Precincts

The Infill affordable housing provisions was introduced in December 2023 to incentivise the development of affordable housing to address the ongoing housing crisis. The provision allows for a 30% increase in FSR and height limits where at least 15% of the



gross floor area of a development is used for affordable housing. The benefits of affordable housing are well known including social stability for low-income individuals and families, reducing the risk of homelessness; economic stability by reducing the burden of housing, residents can allocate more of their income toward other necessities; and stable and affordable housing is linked to better physical and mental health. Affordable housing allows for housing provisions to essential workers such as teachers, nurses and cleaners and therefore keeps driving the New South Wales economy.

I note there is a mandatory affordable housing contribution of between 5–10% for all new residential developments in the Homebush precinct, which is estimated to create between 805 and 1,610 affordable homes. However, if the infill affordable housing provisions were to apply to all of the Transport Orientated Development this will allow for a significant increase in the construction of affordable housing in all 8 of the accelerated precincts along with 37 suburbs where the new Transport Orientated Development planning controls apply.

I would, therefore, strongly urge for the **Infill Affordable Housing provisions to apply in all Transport Orientated Development regions** to allow for the creation of affordable housing that is urgently required in Sydney.

### **Summary**

In summation, to combat the housing crisis, I fully support the rezoning proposals outlined in the TOD Homebush Report, with the following amendments:

1. Increase densification of properties bounded by Station St, Loftus Crescent, Parramatta Rd and Subway Lane, Homebush to FRS 7:1 and maintain the height of 86m
2. Increased densification of properties bounded by 17-36 Loftus Crescent and 132-162 Parramatta Rd, Homebush to FSR 4:1.
3. Increased densification of properties bounded by properties along Pomeroy Ave, George St and Allen St, North Strathfield to FSR 6:1 and height of 70m
4. To allow the principles of the 'Infill Affordable Housing Provisions' to facilitate the delivery of affordable housing.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 5:07:34 AM

---

Submitted on Wed, 28/08/2024 - 05:07

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush

**Please provide your view on the project**

I am just providing comments

### **Submission**

The proposal will also require significant local council investment and support.

Residential waste management and cleanliness of open spaces is already an issue across the area, particularly around the George st Bakehouse precinct, and parks west of Powell's CK.

Enhanced maintenance and facilities would be required from council not just developers to make this open space appropriate for an increase in residents. Street cleaning in the as broader Strathfield area is near non existent and there are significant littering issues as well as overload high density bin rooms. Without the investment in council facilities and an improved council or state government investment in maintenance in this area the development will just exacerbate these problems.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 5:53:10 AM

---

Submitted on Wed, 28/08/2024 - 05:52

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

ANTONIO

**Last name**

D'ACUNTO

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield 2137

**Please provide your view on the project**

I support it

**Submission**

Subject: Have your say on Transport Oriented Development (TOD) accelerated precincts.

Dear NSW State Planning Department,

I am writing to express my unwavering support for the proposed rezoning and development in the Homebush precinct. As a long-time property owner on Hamilton Street, North Strathfield, since 1992, I wholeheartedly endorse this initiative and the transformative potential it holds for our community.

The Homebush area is uniquely positioned for growth, much like the successful redevelopment seen in Rhodes. With its strategic location near rail, metro, highways, Olympic sites, and local amenities—including the new Woolworths, Aldi, Arnott's factory shops, and schools—Homebush is an ideal candidate for increased housing density. This

project is vital for addressing the urgent need for affordable housing close to Sydney's core, benefiting younger generations, emergency workers, hospital staff, and essential workers who deserve to live near their workplaces without enduring long commutes from the outer suburbs.

While I fully understand the personal sacrifices involved, including the potential loss of homes, I believe that these sacrifices will pave the way for a brighter future. The redevelopment will not only create more housing opportunities but also strengthen our community by making it more accessible and vibrant.

Unfortunately, it is disheartening to see that our local councils, particularly the City of Canada Bay, are opposing this much-needed development. Their stance appears to stem from a reluctance to embrace growth, citing unfounded concerns rather than constructive solutions. In my interactions with the council, it has become clear that their opposition is driven by a lack of resources and an unwillingness to adapt. Rather than seizing this opportunity to improve our infrastructure and road systems, they are resorting to scare tactics and negativity.

The mayor's recent comments, which can be seen in this article below, are a prime example of this short-sightedness. Rather than fostering a vision for the future, the council is choosing to resist progress, failing to see the benefits that this development will bring to the entire community.

<https://archive.md/2024.08.27-100005/https://www.dailytelegraph.com.au/newslocal/inner-west/sydney-council-weighs-up-legal-fight-over-mass-rezoning-plans-for-16100-medium-highrise-homes/news-story/8d20c19126666cd786e13c6bd58a012a?amp&nk=6acc51332f428c21948a630e335f8852-1724752707>

I strongly believe that this rezoning is the right path forward. It aligns perfectly with the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) and the TOD program's goals. The local councils' opposition should not be allowed to derail this vital project. Instead, we should focus on the positive impact it will have on housing affordability, urban connectivity, and community development.

In conclusion, I urge the NSW State Planning Department to continue pushing forward with this rezoning proposal. The future of Homebush, North Strathfield, and surrounding areas depends on it. We, the property owners who believe in progress, stand ready to support this initiative in any way we can.

Thank you for your continued efforts in making Sydney a more liveable and inclusive city.

Kind regards,  
Antonio D'Acunto

 Nth Strathfield 2137

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 9:27:36 AM  
**Attachments:** [manson-road-tod-submission.pdf](#)

---

Submitted on Wed, 28/08/2024 - 09:25

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am submitting on behalf of my organisation

## **Name**

### **First name**

Mecone Group

### **Last name**

on behalf of landowner 23,25 and 27 Manson Road

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Strathfield

### **Please provide your view on the project**

I object to it

### **Submission file**

[manson-road-tod-submission.pdf](#) (731.61 KB)

### **Submission**

Please see attached submission in relation to the land at 23,25 and 27 Manson Road, Strathfield

### **I agree to the above statement**

Yes

28 August 2024

Department of Planning, Housing and Infrastructure  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

Lodged via Planning Portal

Dear Sir/Madam

**RE: Homebush Transport Oriented Development rezoning proposal**

This submission is made on on behalf of the landowner at 23,25 and 27 Manson Road, North Strathfield and responds to the public exhibition of the proposed Transport Oriented Development rezoning of land within the Homebush TOD Accelerated Precinct.

The site is located within 650m walking distance of Strathfield train station and 170m from Parramatta Road. It is within the area bounded by Leicester Avenue and Everton Road, Swan Avenue and Parramatta Road which is zoned R3 Medium Density Residential. This land is well located for residential densification given the proximity to public transport services and the landowner supports the TOD program intent to provide well located additional housing.



**Figure 1: The site in context (site outlined in red)**





We have reviewed the exhibited documentation in preparing this submission, including:

- Explanation of Intended Effect
- Urban Design Report
- Homebush Precinct Public Domain Strategy Report
- Draft Homebush Precinct Design Guide

We have attached to this letter our detailed submission. In summary, this includes:

- details of the land at 23,25 and 27 Manson Road, North Strathfield
- a detailed review of the planning proposals for the site in the TOD precinct and commentary on the implications for the land at 23,25 and 27 Manson Road, North Strathfield

The renewal of the eastern side of Leicester Road, with appropriate FSR and height controls can provide an important contribution in the delivery of much needed and diverse housing, with complementary open space in a highly accessible location in line with the TOD Program.

We request that the ongoing investigations to finalise the plans for the TOD Precinct:

- reconsider the boundaries of the nominated key sites containing the proposed Manson Road open space in light of the ownership pattern at 23,25 and 27 Manson Road and the practicalities of site amalgamation from a development perspective
- ensure fair and equitable treatment of all landowners, so that the owners of land nominated as the locations for future open space provision are not disadvantaged through providing land for open space.
- consider whether the open space is optimally located and configured relative to the desired built form outcomes and will deliver amenity to building occupants and open space users, while providing a network of publicly accessible open space.

If you wish to discuss this submission or require further information, please contact me on [REDACTED] or [REDACTED]

Yours sincerely,

Adam Coburn  
**Managing Director**

## THE SITE

The site comprises 4 lots in single ownership:

- 23 Manson Road (Lot 26 DP 4386 and Lot 8 DP 955235)
- 25 Manson Road (Lot X DP 441772)
- 27 Manson Road (Lot Y DP 441772)



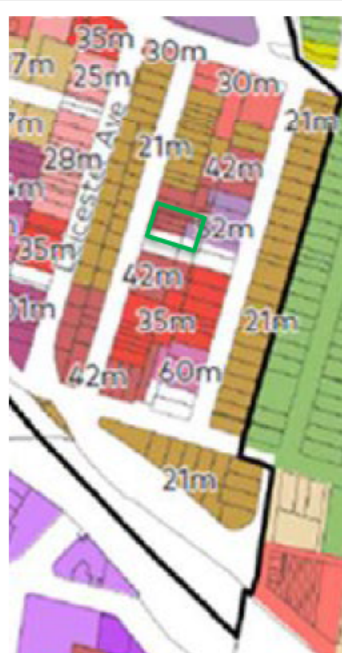
A single level dwelling house and semi-detached dwellings currently occupy the land.



**Figure 2: The site**

## PROPOSED PLANNING CONTROLS FOR THE SITE

The TOD rezoning proposals propose rezoning land north of Strathfield station and amending the FSR and building heights (including the subject site) as illustrated in the following maps.

		
<b>Figure 3: Proposed land use zoning</b>	<b>Figure 4: Proposed FSR</b>	<b>Figure 5: Proposed building heights</b>
R4 all lots	2.8:1 all lots	42m on Lots X and Y DP 441772 52m on northern part of Lot 8 DP 955235 No building height on Lot 26 DP 4386

Source: Explanation of Intended Effect

Key sites have been identified in the precinct to deliver a proposed minimum amount of publicly accessible open space and/or road. These sites have been identified based on the work undertaken for the Public Domain Strategy Report as ideal locations for additional open space provision to support the additional growth of the precinct.

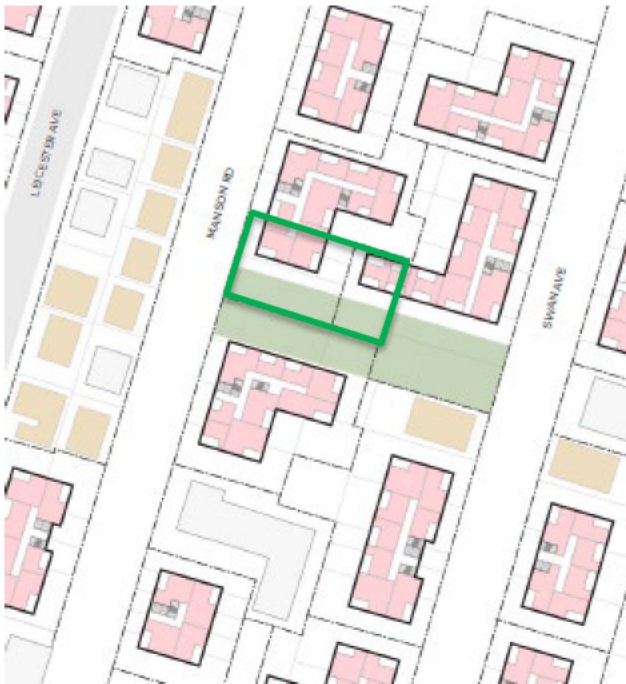
This identifies the opportunity for a small park at Manson Street to provide new open space for the local community on the east side of Leicester Avenue, improve amenity and provide through block connections in an area with long north-south blocks (see Figure 6).



**Figure 6 : Proposed key sites (subject land shown by green boundary)**

*Source: Explanation of Intended Effect*

The open space is also reflected in the 'Proof of Concept' indicative layout contained in the Urban Design Report (see Figure 7)



**Figure 7: Typical lower level floors (indicative layout) (subject land shown by green boundary)**

*Source: Urban Design Report*





**This submission requests reconsideration of the boundaries of the nominated key sites containing the proposed Manson Road open space in light of the ownership pattern at 23,25 and 27 Manson Road and the practicalities of site amalgamation from a development perspective.**

The lots in single ownership which are the subject of this submission are split across two key sites. This is further complicated as the nominated key sites split the lots forming 23 Manson Road as shown in Figures 6 and 7. This is not a pragmatic approach and is likely to make site amalgamation for either of the proposed key sites difficult to realise.

The EIE notes that:

*Consideration will be given to amendments and refinement to the open space and road requirements through consultation with Councils and the community.*

**This submission requests that as part of the ongoing investigations into open space provision and the mechanisms to encourage its delivery, consideration is given to ensuring that the implementation mechanisms, such as incentives, are fair and equitable for the landowners of land nominated as the location for future open space provision.**

The EIE indicates that the Department is investigating mechanisms to encourage the delivery of publicly accessible open space and/or road. These may include incentive FSRs and building heights to encourage site amalgamation and delivery of open space and/or road or restricting the height and FSR of development unless the consent authority is satisfied that the development is consistent with the open space and road requirements identified in the Design Guide. We understand this analysis is ongoing and will be clarified in the finalisation of the rezoning.

There is not sufficient detail available regarding these incentive or restriction provisions in the exhibition material to make a substantive comment on any proposals. It is assumed that the incentive provisions are intended in lieu of any requirement for acquisition for the delivery of open space.

It is noted that the proposed open space east of Leicester Avenue generally occupies whole lots which form part of an identified site amalgamation. The incentive based approach will only be successful if the incentive FSR or height is sufficient to encourage the identified amalgamation. If not, the lots identified as the location of the proposed open space may be excluded from site consolidation, and would be effectively sterilised. This would be an inequitable outcome for the landowners of sites identified for open space.

If the incentive-based approach is not calibrated for success, this may result in the identified amalgamation sites not being redeveloped due to a perception that including the nominated 'open space' sites is difficult. This would be a lost opportunity in a location which is so well located in relation to transport services.

Development at the 'base' FSR and height proposed in the EIE may not deliver the identified open space as part of future development as there is a more limited imperative to amalgamate sites and accommodate the extent of open space identified in the development. Delivery of open space would then be dependent on acquisition of land and the associated availability of funding.

**This submission requests that further consideration is given to whether the proposed open space is optimally located and configured relative to the desired built form outcomes, and will deliver amenity to building occupants and open space users, while providing a network of publicly accessible open space.**

The Homebush Precinct Public Domain Strategy Report supports the proposals contained in the EIE. It identifies local parks, pedestrian links and shared zones to provide a high amenity network of spaces and paths for the community of the local area. This includes the Manson Road Park, part of which is located on 23 Manson Road.

The Public Domain Strategy does not clearly explain the rationale for the location of the park on the identified lots. Review of the document indicates that this location provides a valuable through-block connection on an otherwise long block. The provided map suggests the indicated location will also link Cooper Street Park through the proposed southern pedestrian links and shared zones to the west of Manson Road. A similar through block link could be achieved if the proposed open space was located further north and aligned with the proposed park between Hilts Road and Leicester Ave and a through



site link incorporating the heritage house at 30 Manson Road.

We acknowledge that the 'proof of concept' design outcome in the Urban Design Report represents one built form outcome associated with the proposed controls. We also note it responds to the heritage principle that *'New open space should be located adjacent to heritage items, to provide separation from new infill development and contribute to retention of curtilage and setting'* (Urban Design Report, p101) by locating the open space to the north of the heritage listed house on the western side of Swan Ave.

Detailed testing of the proposed layout should be consider whether the illustrated building forms to the north of the Manson Road Park will deliver the desired internal amenity for residents. Alternative site configurations for building siting may provide opportunity for the Manson Road Park to be located further north, as described above, while ensuring adequate setbacks to the heritage house from new development and high amenity for residents.



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 9:41:09 AM

---

Submitted on Wed, 28/08/2024 - 09:40

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Martin

**Last name**

Koestlin

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2135

**Please provide your view on the project**

I am just providing comments

**Submission**

I support the submission prepared by Think Planners on behalf of Strata Plan 60097, that the entire business park located at 378 Parramatta Rd, Homebush West should be rezoned, rather than a partial area of the business park.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 9:52:11 AM

---

Submitted on Wed, 28/08/2024 - 09:51

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

No

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

NORTH STRATHFIELD

**Please provide your view on the project**

I object to it

### **Submission**

I wish to have my NAME WITHHELD and not published as part of this submission please.

#### **A LITTLE HISTORY - SYDNEY METRO**

Sydney Metro provided residents a scenario. Largely 6 storey development over a limited area. Today's proposal massive by comparison. And why does this plan just affect the western side of North Strathfield station?

#### **PLANNING'S CHOICE OF AREA**

This is the wrong place for this proposal. Instead of choosing a situation with far fewer traffic problems Planning has chosen an area with the worst traffic problems.

#### **THE PROPOSAL - INFRASTRUCTURE**

Infrastructure (e.g. water, sewerage, electricity and roads) will not be provisioned before

any planned construction. We are told that “the plan is to align infrastructure with growth”. Infrastructure needs be made the first priority.

#### AMALGAMATION OF EXISTING LOTS

Large scale amalgamation of residential lots is proposed with TOD\* plans bunching certain properties together. Very little (if any) advice is available as to how this might work. Residents appear to have been thrown a bone and told to work out how it might best be fought over. Planning has seemingly created the necessity for owners to engage with other landholders. The best we are told is that agents or developers might wish to package land parcels. Please provide landholders clarification as to the process by which Planning expects amalgamation to work.

#### DA LODGEMENT

Can a developer lodge a DA without owning a specific property? One resident makes the claim that Planning said yes.

#### THE GEORGE ST / POMEROY ST INTERSECTION

Seven years ago the George St / Pomeroy St intersection was to be upgraded following approval of the Victoria Ave school. That hasn't happened and the community is left to wonder what (if anything) might happen. All transport representative James Li can tell us is that vehicle matters are to be “looked at”.

#### THE PROPOSED NEW ROAD BETWEEN CONWAY AND POMEROY STREETS

Planning's proposed development allows for a new roadway between Conway and Pomeroy Streets. James Li was not prepared to say that it would be ever be built. He said that it is dependent upon developers purchasing properties affected by the proposal. Should we rightly presume that similar infrastructure is dependent upon the action of developers.

#### FORCED SALES

“There will be no forced sales. There will be no compulsory acquisition”.

It seems that should neighbours disagree on whether to stay or go conflict may arise. Sale prices may well be affected or the prospect of living in the shadow of a multi storey building may become very real.

Right now owners have little knowledge of sale prices that might accrue. All that Planning tells us is that land values in this area are already quite high” and that “the VG deals with land values”.

Additional costs are those associated with land sale, relocation, stamp duty and other charges for the purchase of new property. None of this begins to factor in loss and suffering.

Where are owners expected to buy given current real estate values in Concord?

#### ANTICIPATED RESIDENT WORKLOAD & PSYCHOLOGICAL HARDSHIPS (PARTICULARLY FOR OLDER RESIDENTS)

Liaison with other property owners, developers, solicitors, real estate agents, removalists. All the problems associated with moving. Where does one even begin?

#### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 10:06:38 AM

---

Submitted on Wed, 28/08/2024 - 10:06

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2140

**Please provide your view on the project**

I object to it

### **Submission**

My objection is based on the waste management plan for the project which is not working for the current strata developments in the area. For example, currently along Bellona Avenue the bins are never taken inside the property creating an unsightly degraded street scene and unbearable smell in warmer weather. I can see there are three steps to get from backyard to the street so this difficulty may well be why no one brings their bins inside.

Along Pomeroy Street up to the intersection with Underwood Road it is much worse with discarded furniture and rubbish stacked on the nature strip for weeks last June and July. Perhaps when people move out, they have no way of getting rid of their waste? These are the main access roads to transport. The smell and difficulty for pedestrians to get past the rows of rubbish bins on collection days is not acceptable. I cannot believe the current planning for waste management will work for increased density housing as proposed in the Homebush TOD Rezoning proposal.

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 11:35:56 AM

---

Submitted on Wed, 28/08/2024 - 11:35

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush, 2140

**Please provide your view on the project**

I am just providing comments

### Submission

One of the biggest issues we have in this area at the moment is that locals can not move easily around the area due to traffic. Eg getting to and from our local supermarkets, or to the doctors or chemists has become a problem due to traffic. From homebush to get to our local Woolworths in Strathfield we can't go during peak traffic times due to lack of parking, and just general traffic. School drop off and pick up times add a lot of local traffic. As does the peak traffic hours. To get to my local Aldi and drs at North Strathfield can take an hour if done before 9am. The traffic on Parramatta Rd and around Strathfield station is very bad. Something needs to be done to alleviate the local traffic. It never used to be this bad. It's from the ridiculous pricing of the m4/ westconnex I believe. Parramatta Rd and Centenary drive are stand still and so cars are now coming through local roads. Adding in apartments around Parramatta Rd is going to increase local traffic. Govt needs to look at improving traffic flow - between 730am and 930am, and again between 230pm and 6pm.



**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 11:40:25 AM

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Submitted on Wed, 28/08/2024 - 11:40

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

north strathfield

**Please provide your view on the project**

I support it

**Submission**

Hi,

I live in argonne St North Strathfield, I am in favour of the rezoning proposal.

I would like to see an equal higher floor space ratio applied to all blocks, as we are all being asked to sell and move.

The central location to ConcordWest and north strathfield train stations, along with the new metro, and the Westconnex indicates north strathfield as a perfect place for development.

regards

[REDACTED]

**I agree to the above statement**  
Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 11:48:50 AM

---

Submitted on Wed, 28/08/2024 - 11:48

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

■

**Last name**

■

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

■

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

### Submission

Submission in Support of the Homebush TOD Rezoning Proposal

I support the Homebush TOD Rezoning Proposal because it addresses one of the main barriers preventing my family and me from moving to NSW—housing affordability. As a nurse, I know that finding a job in NSW won't be difficult, especially with the demand for healthcare professionals in public hospitals. However, the high cost of housing has made it challenging for us to consider relocating, despite the opportunities available in the area. The TOD proposal offers a solution by making apartments more affordable and accessible near key transport hubs. This not only benefits healthcare workers like myself who want to contribute to the community but also supports the local healthcare system by making it easier for essential workers to live closer to their workplaces. I believe this proposal is a step in the right direction, and I strongly support it.

**I agree to the above statement**

Yes





I am writing to submit my request for consideration of extending the current TOD rezone boundary map further north to include the upper end of George Street, Concord West, towards Victoria Avenue.

Key Points:

- Our properties are within 100 - 200 metres of Concord West station, making them prime candidates for higher-density development.
- Rezoning from R3 to R4 would support Government efforts to meet housing targets.
- Most of our properties consist of older, cladded homes that no longer align with modern housing designs, making this area ideal for redevelopment.
- Several adjoining property owners are willing to sell collectively to developers.
- While Canada Bay Council rezoned our properties from R2 to R3 in 2022, the broader context has changed with the current TOD Project focusing on R4 high-rise developments.

At present, the proposed rezoning stops just short of the One King Street project (the old Westpac bank building). My neighbours and I strongly believe that the rezoning should be extended up to the Victoria Avenue intersection, or even further, reaching the George Street cul-de-sac. This extension would transition the area from the current inadequate R3 zoning to R4 zoning.

The recent Parramatta Road Strategy included all of George Street, Concord West, right up until the cul-de-sac adjoining Station Ave and they labelled this said area in their boundary zoning map, the Homebush North Precinct! These unfortunate properties have now been omitted from the TOD rezoning at Council's request, and removed from the 'Homebush North Precinct' zoning map, supposedly in order to preserve Canada Bay's R2 to R3 work back in 2022.

Our properties, with narrow widths of approximately 10.5 metres and depths of around 50 metres, are poorly suited for townhouse development under the R3 zoning. Developers have shown little interest in pursuing projects under the current zoning, as it would require acquiring multiple properties, with restricted height, which is not financially viable. However, there is significant interest in development if the zoning were changed to R4, enabling the construction of units which would assist in achieving Government housing targets.

In 2015, several developers approached us with interest in purchasing our properties collectively. Unfortunately, the process was hindered by the costs, time, and challenges of applying for a spot rezone as many owners are pensioners and can't not financially contribute. The lack of R4 zoning ultimately made the project unfeasible.

I understand that Canada Bay Council has requested the Department of Planning to exclude our properties from the TOD Project to preserve the R2 to R3 rezoning however, I believe it is only fair that our properties be reconsidered for R4 zoning in line with the TOD Project.

I urge you to review this submission and consider extending the TOD Rezone map to include the upper end of George Street. This adjustment would align with the broader development goals of the area and provide a viable solution to the challenges posed by the current zoning and housing targets.

Thank you for your time and consideration.

Sincerely,

[REDACTED]

**I agree to the above statement**

Yes

*Please keep our name and address confidential. Thanks!*

To:  
Department of Planning  
Canada Bay Council  
Strathfield Council

28 August 2024

**Property Owner:** [REDACTED], CONCORD WEST NSW 2138

**Subject: Request for Extension of TOD Rezone Boundary Map to Include Upper North George Street, Concord West NSW 2138**

Dear Department of Planning,

I am writing to submit my request for consideration of extending the current TOD rezone boundary map further north to include the upper end of George Street, Concord West, towards Victoria Avenue.

Key Points:

- Our properties are within 100 - 200 metres of Concord West station, making them prime candidates for higher-density development.
- Rezoning from R3 to R4 would support Government efforts to meet housing targets.
- Most of our properties consist of older, clad homes that no longer align with modern housing designs, making this area ideal for redevelopment.
- Several adjoining property owners ([REDACTED]) are willing to sell collectively to developers.
- While Canada Bay Council rezoned our properties from R2 to R3 in 2022, the broader context has changed with the current TOD Project focusing on R4 high-rise developments.

At present, the proposed rezoning stops just short of the One King Street project (the old Westpac bank building). My neighbours and I strongly believe that the rezoning should be extended up to the Victoria Avenue intersection, or even further, reaching the George Street cul-de-sac. This extension would transition the area from the current inadequate R3 zoning to R4 zoning.

The recent Parramatta Road Strategy included all of George Street, Concord West, right up until the cul-de-sac adjoining Station Ave and they labelled this said area in their boundary zoning map, the *Homebush North Precinct*! These unfortunate properties have now been omitted from the TOD rezoning at Council's request, and removed from the '*Homebush North Precinct*' zoning map, supposedly in order to preserve Canada Bay's R2 to R3 work back in 2022.

Our properties, with narrow widths of approximately 10.5 metres and depths of around 50 metres, are poorly suited for townhouse development under the R3 zoning. Developers have shown little

interest in pursuing projects under the current zoning, as it would require acquiring multiple properties, with restricted height, which is not financially viable. However, there is significant interest in development if the zoning were changed to R4, enabling the construction of units which would assist in achieving Government housing targets.

In 2015, several developers approached us with interest in purchasing our properties collectively. Unfortunately, the process was hindered by the costs, time, and challenges of applying for a spot rezone as many owners are pensioners and can't not financially contribute. The lack of R4 zoning ultimately made the project unfeasible.

I understand that Canada Bay Council has requested the Department of Planning to exclude our properties from the TOD Project to preserve the R2 to R3 rezoning however, I believe it is only fair that our properties be reconsidered for R4 zoning in line with the TOD Project.

I urge you to review this submission and consider extending the TOD Rezone map to include the upper end of George Street. This adjustment would align with the broader development goals of the area and provide a viable solution to the challenges posed by the current zoning and housing targets.

Thank you for your time and consideration.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:22:44 PM

---

Submitted on Wed, 28/08/2024 - 12:22

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2046

**Please provide your view on the project**

I object to it

### **Submission**

As a resident of the council I am concerned of large building complexes which will bring more traffic and it will change the look and feel of the area. My objection is mostly around the high of the buildings. I believe that in order to not have a major visual impact, buildings should not have more than 5 floors. I also hope urban planning is taking into consideration in order for those buildings to not look too different from the rest of the suburb.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:49:31 PM

---

Submitted on Wed, 28/08/2024 - 12:49

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

■

**Last name**

■

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

■

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

### Submission

Submission in Support of the Homebush TOD Rezoning Proposal

I support the Homebush TOD Rezoning Proposal because it offers hope for young professionals like myself who want to return to their roots and settle down in areas they grew up in. After completing my university studies in Queensland, I find it incredibly difficult to move back to NSW due to the high property prices. The TOD proposal, with its focus on creating more affordable apartments near transport hubs, gives me a chance to return to the community where I grew up.

This proposal addresses a critical issue for many people in my situation by making it more feasible to purchase a home in a well-connected location. It aligns with my desire to live in a community with convenient access to transport and opportunities. I believe this proposal can bring much-needed relief to those struggling to enter the housing market, and I strongly support it.



**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 12:57:21 PM  
**Attachments:** [submission-to-nsw-planning\\_compressed.pdf](#)

---

Submitted on Wed, 28/08/2024 - 12:55

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2221

**Please provide your view on the project**

I support it

**Submission file**

[submission-to-nsw-planning\\_compressed.pdf](#) (2.39 MB)

**Submission**

I request to rezone whole land of our campus. Please see attachment for the reasons. Thank you

**I agree to the above statement**

Yes

20 August 2024

Department of Planning Housing and Infrastructure

Dear Sir/Madam,

## **SUBMISSION: HOMEBUSH TOD REZONING PROPOSAL**

### **STRATA PLAN 60097**

I refer to the above subject matter which is on public exhibition until 30 August 2024.

This submission has been prepared by Think Planners on behalf of the Strata Plan 60097 (ABN 72 665 680 721), at 378 Parramatta Road Homebush West

The subject land is identified below for context. This area is consistently referred to as “the subject land” throughout this submission.

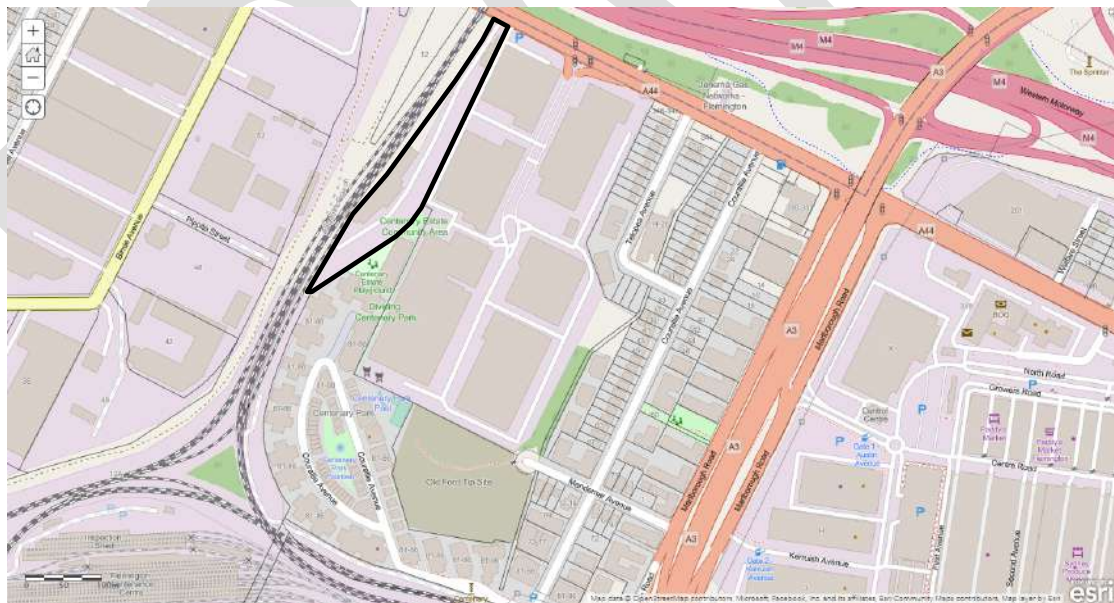


Figure 1 The location of the subject land is yellow and outlined in black (Source: Spatial Collaboration Portal)

Contextually, the subject land has the following relationships:

- North: Parramatta Road provides direct street frontage
- South: Existing Residential Flat Buildings adjoin the southern boundary

- East: The Goodman Campus Business Park provides jobs and services for residents and visitors
- West: T7 Olympic Park Railway Line

The subject land is located partly within the Homebush Precinct, at its western most boundary and with direct frontage to Parramatta Road as shown in Figure 2. It is notable that artistic renderings within the urban design report cut off the subject site, suggesting that a full consideration of its potential has not occurred.

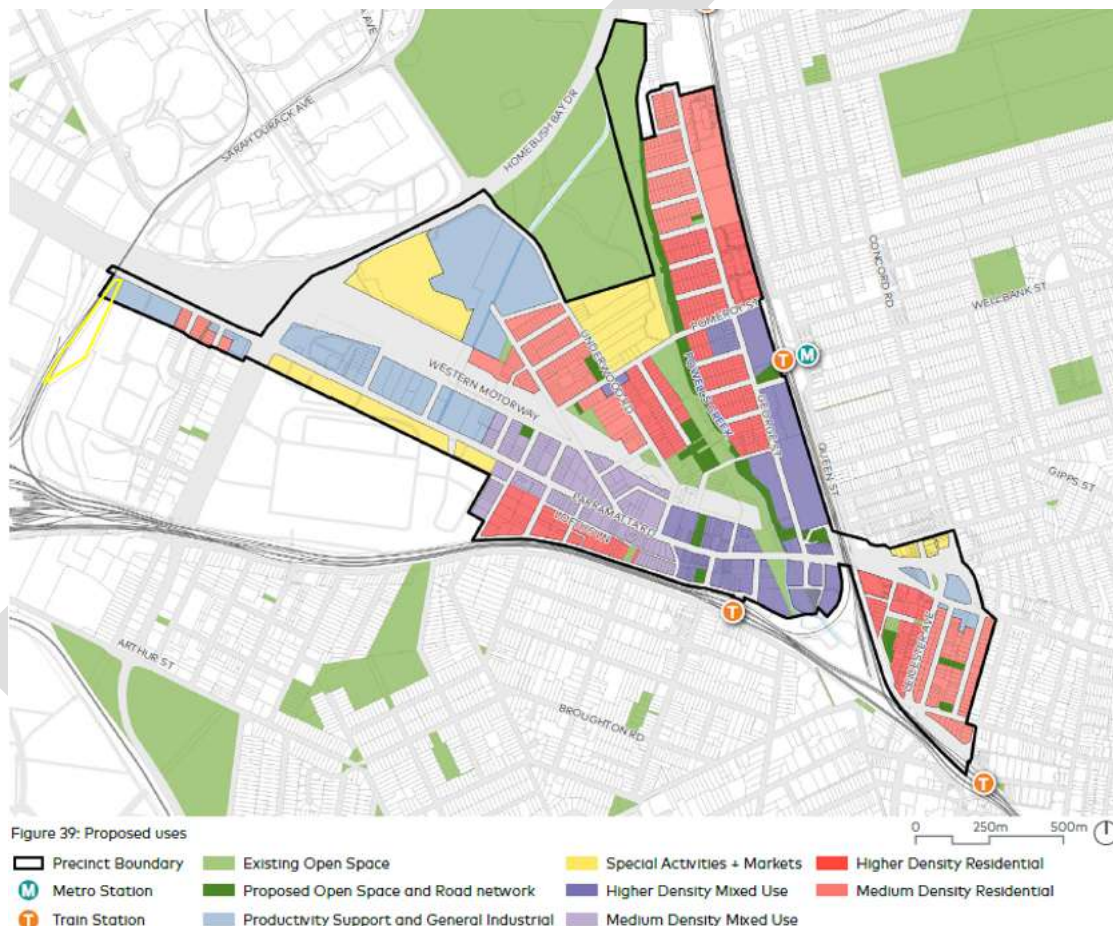


Figure 2 The subject land is outlined in yellow line and is on the southern side of Parramatta Road (Source: Urban Design Framework )

This submission agrees with the principle of retaining employment land fronting Parramatta Road. However, it recommends that the DPHI expand the precinct to include the broader site which is capable of delivering much needed housing supply within an accessible location, close to transport, jobs and open spaces. Furthermore, it would unify the site with the neighbouring residential land to the south, providing a more effective and appropriate transition between land uses.

## TOD ACCELERATED PRECINCTS (THE 8 SITES) OBJECTIVES

The Department of Planning, Housing and Infrastructure have 4 objectives to deliver high and mid-rise housing within 1,200 m of 8 transport hubs, which includes the Homebush Precinct. These objectives are set out in turn below, and high level commentary provided in relation to an assessment of the objectives against the subject land:

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in well-located areas</li> </ul>	<p>The subject land is within 800m of the 401 Bus Route, located on Parramatta Road. Likewise the Routes 525 and 526 are within immediate vicinity of the subject site.</p> <p>The subject land is therefore well located for housing supply, consistent with the intent and provisions of transport oriented development.</p>	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance of train and metro stations</li> </ul>	<p>The subject land can achieve compliance with this objective, being within 400 m to bus services.</p> <p>The site is a significant area that can deliver a range of land uses. Employment uses fronting Parramatta Road could be reimagined and further development, making a valuable contribution to job creation, along with new economic opportunities presented by a different development form.</p> <p>To the rear of the employment use, residential apartments can be comfortably accommodated on the site, strengthening the character of the area, along with more homes delivered, including affordable apartments. Residential apartments will tie seamlessly into the existing high density residential land, which creates a more attractive outlook for the existing apartment buildings, whilst providing more housing opportunities in a great location.</p>	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	<p>The subject land offers the opportunity to support a more consolidated and coherent neighbourhood within the western edge of the Homebush Precinct.</p> <p>Providing housing supply that within close proximity to extensive public spaces, while also have a nexus with the employment lands on subject land and to the east.</p>	✓

<ul style="list-style-type: none"> <li>increase the amount of affordable housing in these locations</li> </ul>	The subject land can contribute to affordable housing supply.	✓
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## REZONING PROPOSAL OBJECTIVES

The Department published Explanation of Intended Effects clearly identifies that housing is a key priority, with a focus on increasing the diversity and supply of homes (including affordable homes) in areas close to transport and other amenities (i.e. recreation, services, entertainment, etc). The intent is to specifically maximise the efficient use of transport infrastructure, putting more homes near jobs and transport, thus improving life quality through shorter trip journey times and active transport options.

The State led rezoning proposal has five key objectives identified within the Homebush Precinct Park Explanation of Intended Effects. These are discussed below.

Objective	Response	Consistent
<ul style="list-style-type: none"> <li>increase housing supply in the Precinct</li> </ul>	The subject land can contribute to additional housing supply, within a well located area and proximate to existing housing and employment.	✓
<ul style="list-style-type: none"> <li>enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;</li> </ul>	The subject land can deliver a variety of land uses that are accessible via active transport means.	✓
<ul style="list-style-type: none"> <li>deliver housing that is supported by attractive public spaces, vibrancy, and community amenity</li> </ul>	The subject land with amendments made to the strategy, contribute to a streamlined planning approach that delivers more housing faster.	✓
<ul style="list-style-type: none"> <li>increase the amount of affordable housing in the Precinct</li> </ul>	The subject land can contribute to affordable housing supply.	✓
<ul style="list-style-type: none"> <li>review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth.</li> </ul>	The subject land can deliver the recommendations of PRCUTS along with delivering additional residential growth.	✓



As the subject land satisfies both the overarching objectives of the TOD program and also the State led rezoning proposal, it should therefore be included as a site that can deliver additional housing supply. Importantly, the subject land is also ideally located to contribute to employment generation. This is a significant win through the development of higher value employment land along Parramatta Road. The particular merits of the subject land and the proposal to permit housing are discussed further below.

## THE PRECINCT

Given that the subject land meets both the objectives within the TOD precinct and the Explanation of Intended Effects, this submission requests that DPHI expand the precinct boundary to include its boundaries. This will facilitate additional housing on land where:

- it has a relationship with existing residential apartment buildings to the south, providing an integrated housing precinct, resolving a poor interface that currently exists.
- housing can be provided close to jobs and services within the Goodman Business Park.
- homes are provided close to public transport and within reasonable cycling distance to trains and metro.
- homes can be provided to the rear of employment uses along Parramatta Road, which provides an appropriate buffer, whilst maintaining employment in an appropriate location.

It is recommended that:

- The TOD precinct include the subject land in its entirety.
- The frontage to Parramatta Road retain its existing zoning.
- The balance of the site be zoned R4 High Density Residential .



Figure 3 The PRCUTS boundary should be expanded to include the subject site, with the additional area zoned R4 high density residential, which is more consistent with its context. (Source: Urban Design Framework )

## FSR AND HEIGHT

The Explanation of intended Effects reduces the FSR over the subject land from PRCUTS recommended 1.5:1 to 1:1. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction.

This is shown below taking the site area as an estimated 18,507 m<sup>2</sup>.

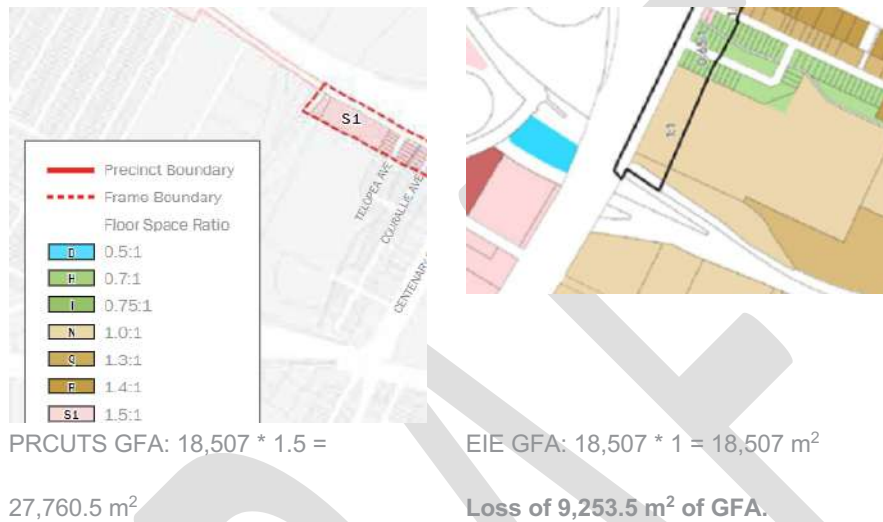


Figure 4 The PRCUTS and EIE FSR maps, showing a reduction in FSR (Source: NSW Government )

Similarly, The Explanation of intended Effects reduces the height over the subject land from PRCUTS recommended 17m to 12m. This is strongly objected to, with neither the urban design study nor the EIE providing rational for this significant reduction and loss of development potential.



Figure 5 The PRCUTS and EIE FSR maps, showing a reduction in height (Source: NSW Government)

Both the height and FSR reduction completely reduces the potential for jobs over the subject land and specifically is inconsistent with the PRCUTS implementation plan.

Furthermore the reduction in FSR and height makes it more difficult to achieve the intent of the EIE which has the following relevant objectives:

- *review and implement the objectives and recommendations of the NSW Government endorsed Parramatta Road Corridor Urban Transformation Strategy including investigation opportunities or further residential Growth*
- *enable a variety of land uses (residential, commercial, recreational) within walking distance to the train stations and future metro station;*

This reduction is strongly objected to and it is requested that:

- The FSR at minimum be applied at 1.5:1 over the subject land.
- The PRCUTS height of 17m be retained over the Parramatta Road frontage
- The balance of the site have a height of 20m, commiserate with the R4 zoned land to the south.

## RECOMMENDATIONS

The subject land presents a unique opportunity to balance housing supply with employment uses, along with providing a better transition from existing residential to employment lands. This submission also objects to the reduction in development capacity over the subject land in the EIE and specifically requests that at minimum PRCUTS height and FSR be applied.

Accordingly, it is recommended that –

- The TOD precinct include the subject land in its entirety
- The frontage to Parramatta Road retains its existing proposed PRCUTS zoning
- The balance of the site be zoned R4 High Density Residential
- The proposed FSR controls be amended to:
  - Retain the 1.5:1 as per PRCUTS
  - Apply a 1.5:1 FSR over the area recommended for inclusion in an expanded Homebush Precinct boundary
- The proposed height of buildings controls be amended to:
  - Retain the PRCUTS height of 17m over the Parramatta Road frontage
  - Apply a height of 20m, which is the same as the R4 zoned land to the south over the area of the subject land recommended for inclusion within an expanded Homebush Precinct.

## Conclusion

Thank you for the opportunity to make this submission on the accelerated Homebush TOD Precinct.

Our client appreciates the desire of DPHI to put homes and jobs within the right location to improve the liveability and affordability of Sydney generally. Whilst supportive of the overarching theme of the Homebush TOD, we strongly recommends adoption of the recommendations within this submission to further improve housing affordability and liveability within Homebush.

Should you require any further information or require a meeting to discuss this further, I can be contacted on 02 9687 8899 or [ben@thinkplanners.com.au](mailto:ben@thinkplanners.com.au).

Ben Creighton  
Executive Planner  
**Think Planners Pty Ltd**  
PO BOX W287  
PARRAMATTA NSW 2150

## **MU GROUP CONSULTING**

### **Due Diligence Technical Note**

## **Residential Rezoning and Mixed Development at 378 Parramatta Road, Homebush West**

**Issue: DRAFT December 2022**

**Ref: P22\_28\_TK\_378PR\_FSD**



This Due Diligence Technical Note has been prepared by MU Group Consulting for Direct Strata Management and may only be used and relied on by Direct Strata Management for the purpose agreed as set out in the Consultancy Agreement.

The services undertaken by MU Group Consulting in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. MU Group Consulting has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

MU Group Consulting has prepared this Due Diligence Technical Note on the basis of information provided by Direct Strata Management and others who provided information to MU Group (including Government authorities), which MU Group has not independently verified or checked beyond the agreed scope of work. MU Group Consulting does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

## Report Control Form

### Revision History

Revision	Date	Prepared by	Reviewed by	Approval for issue by
0	21/12/2022	A Tamhane	J Diaz	
1				



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# 1 INTRODUCTION

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MU Group Consulting have been engaged by Direct Strata Management to prepare a Due Diligence Technical Note to support the residential rezoning and development at 378 Parramatta Road, Homebush West.

The site is located within the Strathfield Council local government area. The subject site is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

Due Diligence Technical Note is prepared in accordance with the requirements of Strathfield Council Development Control Plan (SCDCP) 2005 and TfNSW '*Guide to Traffic Generating Developments*' to accompany a Planning Proposal to rezone and redevelopment of site located at 378 Parramatta Road, Homebush West for mixed use purposes.

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012.

The purpose of this Due Diligence Technical Note is to undertake high level review of parking, trip generation and potential impact on surrounding road network and public transport and vehicular access and active transport facilities to and from the site.

## 2 SITE DETAILS

### 2.1 SITE DESCRIPTION

The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.

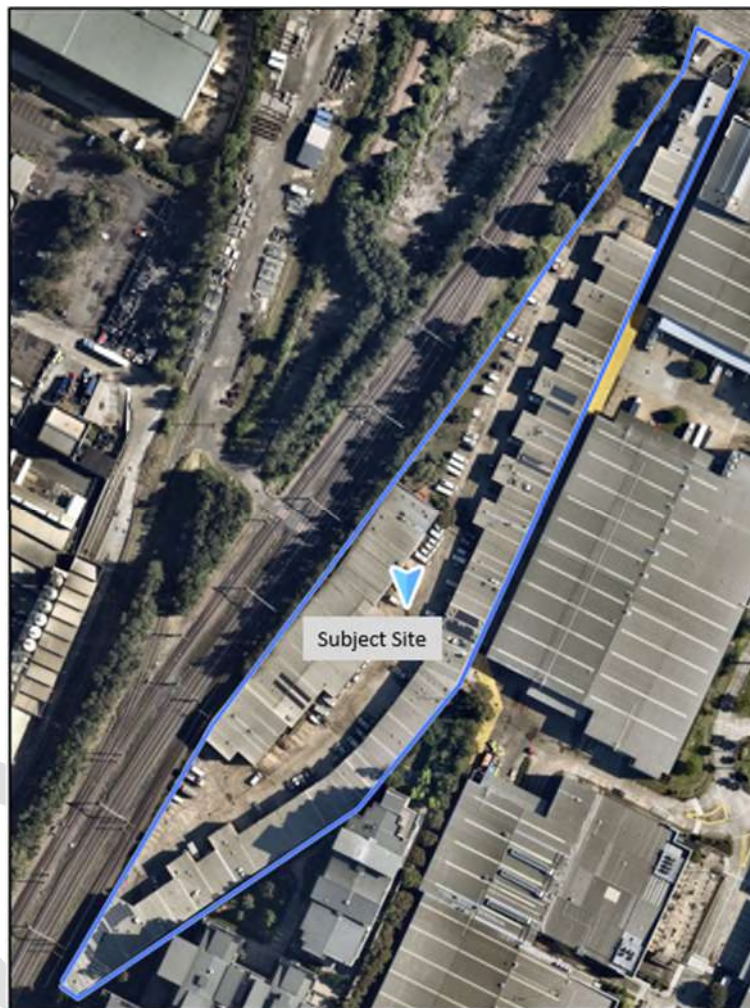


Figure 1 – Site location (Source Nearmap 2022)

### 2.2 EXISTING LAND USE AND ZONING

The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 53 onsite industrial unit including office space. The site has vehicular access via left-in left-out driveway off Parramatta Road. Vehicular access is restricted to left-in and left-out only due to existing median on Parramatta Road fronting the subject site.

### 3 EXISTING ROAD NETWORK

---

#### **Parramatta Road (A44)**

Parramatta Road forms part of a State Road network that provides a major east / west connection between Homebush, Clyde, Burwood, Summer Hill and Ashfield. It has divided carriageway with two lanes in each direction with varying widths and a median. Parramatta Road has posted speed limit of 60 km/hr.

#### **Courallie Ave**

Courallie Ave is a local road that runs in loop in a south to north alignment near the subject site. It primarily provides a north / south connection between Parramatta Rd and Arthur Street for existing residential properties. It has one traffic lane in each direction. Courallie Ave has a posted speed limit of 50km/h.

#### **Marlborough Road**

Marlborough Road is a local road that runs in a south to north alignment on either side of the Centenary Drive (A3) near the subject site. It primarily provides a north / south connection between Parramatta Rd and Railway line for existing commercial and residential properties. It has three traffic lanes in each direction. Marlborough Road has a posted speed limit of 60km/h.

## 4 TRAFFIC VOLUMES

### 4.1 EXISTING TRAFFIC VOLUMES

Figure 2 and Figure 3 below presents the volumes from TfNSW traffic counts stations located on Parramatta Road (2016). This location is considered to be representative of the scale of traffic volumes travelling along Parramatta Road fronting the subject site. The volumes on Parramatta Road west of Telopea Avenue indicate that the section of Parramatta Road would be classified as a class 4 urban road (4U), typically considered as a State Road with moderately high traffic volumes.

	2016	2017	2018
→ E	5,197	-	-
← W	5,570	-	-
→ E ← W	10,767	-	-

Figure 2: AM peak traffic Volumes (2016)

	2016	2017	2018
→ E	6,067	-	-
← W	6,244	-	-
→ E ← W	12,311	-	-

Figure 3: AM peak traffic Volumes (2016)

### 4.2 ROAD CAPACITY

The capacity of urban and rural roads is generally determined by the capacity of intersections. Table 4.3 and 4.4 of the NSW "Guide to Traffic Generating Developments" below provides some guidance on mid-block capacities for urban roads and levels of service.

A desirable level of service on an urban road is generally considered to be a level of service (LoS) C or better however on an arterial road such as the Parramatta Road a LoS D is still considered acceptable. Based on the tables below it was considered that the Parramatta Road would have a one-way midblock capacity of up to 2,200 vehicles per hour.

**Table 4.3**  
**Typical mid-block capacities for urban roads with interrupted flow**

Type of Road	One-Way Mid-block Lane Capacity (pcu/hr)	
Median or inner lane:	Divided Road	1,000
	Undivided Road	900
Outer or kerb lane:	With Adjacent Parking Lane	900
	Clearway Conditions	900
	Occasional Parked Cars	600
4 lane undivided:	Occasional Parked Cars	1,500
	Clearway Conditions	1,800
4 lane divided:	Clearway Conditions	1,900

**Table 4.4**  
**Urban road peak hour flows per direction**

Level of Service	One Lane (veh/hr)	Two Lanes (veh/hr)
A	200	900
B	380	1400
C	600	1800
D	900	2200
E	1400	2800

As the 2016 traffic volumes above are more than the determined one-way road capacity of 2,200 vehicles per hour for Parramatta Road, it is evident that **Parramatta Road** in the vicinity of the subject site **is currently operating beyond its capacity** available to cater for any additional traffic generated by development in the area.



## 5 EXISTING PUBLIC TRANSPORT NETWORK

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### 5.1 BUS SERVICE

There are currently limited bus routes in the vicinity of the site. The site is currently serviced by one main bus route, Route 401 providing connection to Lidcombe Rail Station. Routes 525 and 526 passes across the site providing connection to Parramatta and Rhodes shopping centre.

### 5.2 RAIL SERVICE

There are several rail stations near the subject site. Three main rail stations near the southwest southeast boundary of the site are Lidcombe, Flemington, and Strathfield. Lidcombe station is located approximately 2.3 km from the site, Flemington and Strathfield station is located approximately 1.5km and 2.3km from the site, respectively.

### 5.3 PEDESTRIAN AND BICYCLE FACILITIES

Pedestrian infrastructure along Parramatta Road fronting the site is generally of a good standard with a network of concrete footpaths, pedestrian crossings and signalised intersections with pedestrian phases providing safe and convenient access between the sites. There is approximately 1.5m wide footpath across the frontage of the site.

The road network surrounding the site does not provide any dedicated infrastructure for cyclists who must share the road space with other vehicles.

Overall, the existing site has access to pedestrian infrastructure and public transport that can accommodate the requirements of the proposed development.

### 5.4 CRASH HISTORY

Crash History Data extracted from TfNSW Centre for Road Safety website indicate that total seven crashes occurred near the site in last five years from 2017 to 2021. Three crashes resulted in minor injury and remaining four crashes resulted in moderate injury. Location of the crashes occurred is shown in figure 4 below.

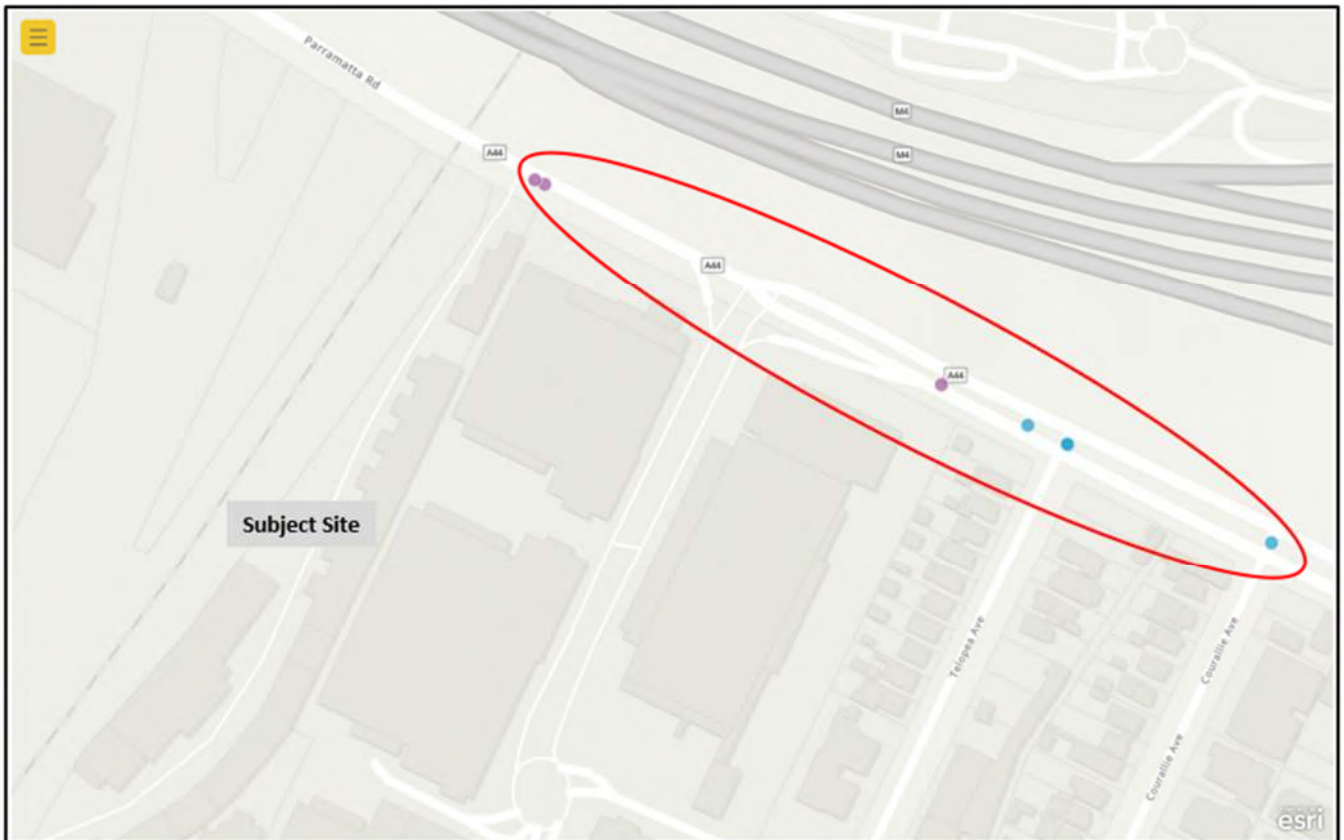


Figure 4.0 – Location of crashes occurred near the site (Source: TfNSW Centre for Road Safety)

## 5.5 EXISTING PARKING CONTROLS

Subject site currently has onsite parking available for tenants and visitors. Clearways are in operation along Parramatta Road fronting the site between 6am-7pm weekdays and 8am – 8pm weekends. In addition, there is “No Stopping” parking restriction in place along Parramatta Road near the site.



Figure 5: Existing parking controls near the site

## 6 DEVELOPMENT PROPOSAL

### 6.1 DEVELOPMENT DESCRIPTION

The proposed development would include the rezoning and redevelopment of the site for mixed use purposes, consisting of the following components:

- Residential Apartments (up to 1,000)
- Commercial / Retail Premises.
- Office Space

Proposed development yield is given in table 1 below:

Apartment	Unit
One Bedroom Units	50
Two Bedroom Units	800
Three Bedroom Units	150
Other Type	Area
Commercial/Retail/Office Space (M <sup>2</sup> )	4000

Table 1: Proposed development yield

Access to the site is proposed from Parramatta Road (left in-left out) via the existing driveway.

Parking for the proposed development will be provided onsite. However, no information was available in relation to the number of parking spaces proposed for the development at the time of drafting this report.

### 6.2 VEHICULAR ACCESS

Vehicular access to the proposed development will be provided via the existing driveway off Parramatta Road. Proposed access will be restricted to left in and left out due to existing median on Parramatta Road.

### 6.3 DCP PARKING REQUIREMENTS

Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.

Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.

Summary of off-street parking in Strathfield Municipal Council LGA is given in Table 2 below:

Land Use	Parking Rate		
Residential Flat Building	1 Bedroom Unit	1 space per unit	Visitors: 1 space per 5 units
	2 Bedroom Unit	1 space per unit	Bicycle Parking: Provide suitable facilities for bicycle parking
	3 Bedroom Unit	1.5 space per unit	
Office Premises	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage) For Offices > 1000sqm GFA 1 space per 75 sqm of GFA (Based on encouraging public transport usage)		
Retail / Commercial Premises	For Shops < 500sqm GFA 1 space per 100 sqm of GFA For Shops between 500sqm and 1000 sqm GFA 1 space per 40 sqm of GFA For Shops > 1000sqm GFA 1 space per 25 sqm of GFA		

Table 2: Off Street Parking – DCP Requirements (Source: - Strathfield Council DCP 20 – 2005)

## 6.4 PARKING REQUIREMENTS FOR THE PROPOSED DEVELOPMENT

Based on the Strathfield Council's DCP requirements estimated parking spaces required for the proposed development are provided in Table 3 below:

Land Use	Number Of Units	GFA Sqm	Parking Rate		No of Parking Spaces Required
Residential Flat Building	50		1 Bedroom Unit	1 space per unit	50
	800		2 Bedroom Unit	1 space per unit	800
	150		3 Bedroom Unit	1.5 space per unit	225
				Visitors: 1 space per 5 units	200
				Bicycle Parking: Provide suitable facilities for bicycle parking	As per Council Requirements
	<b>Total GFA m2</b>	<b>Assumed GFA m2</b>			
Office Premises*	4000	600	For Offices < 1000sqm GFA 1 space per 100 sqm of GFA (Based on encouraging public transport usage)		6
Retail / Commercial Premises*		3400	For Shops < 500sqm GFA 1 space per 100 sqm of GFA		34
			<b>Total</b>		<b>1315</b>

Table 3: Number of parking spaces required as per Council DCP requirements

**\* It was assumed that GFA for Office premises will be 15% of total GFA and GFA for retail / commercial premises will be 85% of total GFA**

## 7 TRAFFIC GENERATION AND IMPACT

The NSW "Guide to Traffic Generating Developments" provides specific advice on the traffic generation potential of various land uses. However, the TfNSW has released a Technical Direction (TDT 2013/04a) with the results of updated traffic surveys and amended land use traffic generation rates.

### 7.1 EXISTING TRAFFIC GENERATION

The site is currently being known as Homebush Business Park and has 53 industrial units including office space onsite. The real estate data obtained from Domain website indicates that each industrial unit has an average GFA of 170m<sup>2</sup> and office space has an average GFA of 30m<sup>2</sup>. The existing traffic generation therefore based on the real estate data and average GFA is shown in Table 4 below:

Existing Land Use	GFA (m2)	Traffic Generate Rate Per Hour		Traffic Generation	
Business Park	9010 (170 x 53)	0.52/100m2 GFA	0.56/100m2 GFA	<b>47</b>	<b>50</b>
Office Space	1590 (30 x 53)	1.6/100m2 GFA	1.2/100m2 GFA	<b>25</b>	<b>19</b>
			<b>Total</b>	<b>72</b>	<b>70</b>

Table 4: Existing Traffic Generation

Based on the traffic generation rates above as per "TfNSW Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a the existing traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.

### 7.2 DEVELOPMENT TRAFFIC

Traffic generation for the proposed development has been estimated based on the traffic generation rates in TfNSW "Guide to Traffic Generating Developments" and Technical Direction TDT 2013/04a.

TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. A linked trip is a trip taken as a side-track from another trip, for example, a person calling in to the centre on the way home from work. A multi-purpose trip is where more than one shop or facility is visited. Any trip discounts would apply differently in new free-standing centres and for new shops within existing centres. Discounts in the former case vary depending on the nature of the adjacent road network. With the latter case, an average discount of about 20% is suggested, with this figure reducing with increasing centre size, with rates of 25% (less than 10,000 m2 GLFA), 20% (10,000-30,000 m2 GLFA) and 15% (over 30,000 m2 GLFA). Accordingly, suggested average discount of 20% has been applied to the total trip generation by the following components of the development:

- Retail / Commercial

Noting the above, 20% of visitors of the retail/commercial either would already be on the site or passing traffic, therefore these trips have been assumed to have been included in the trip generation for other land uses within the site.

In addition, the site currently generates 72 & 70 veh/hr in AM and PM peak. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. The total estimated traffic generation for the proposed development is provided in Table 5 below:

Apartment	No of Units	Traffic Generate Rate Per Hour		Traffic Generation	
		AM	PM	AM	PM
One Bedroom	50	0.09	0.07	5	4
Two Bedroom	800	0.09	0.07	72	56
Three Bedroom	150	0.09	0.07	14	11
			<b>Sub Total</b>	<b>90</b>	<b>70</b>
Other Type	Area				
Commercial/Retail/Office Space	4000	2/100m2 GFA	2/100m2 GFA	80	80
			<b>Sub Total</b>	<b>80</b>	<b>80</b>
			<b>Total</b>	<b>170</b>	<b>150</b>
Average discount of 20% has been applied to Commercial/Retail trip generation				16	16
			<b>Total</b>	<b>154</b>	<b>134</b>
Existing traffic Discount applied to total traffic generation				<b>72</b>	<b>70</b>
			<b>Total</b>	<b>82</b>	<b>64</b>

Table 5: Proposed Traffic Generation




As indicated in Table 5 above the total traffic generation for the proposed development will be 82 veh/hr in AM peak and 64 veh/hr in PM peak which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 10 veh/hr in AM peak and decrease of 6 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd** and surrounding road network.



## 8 SUMMARY

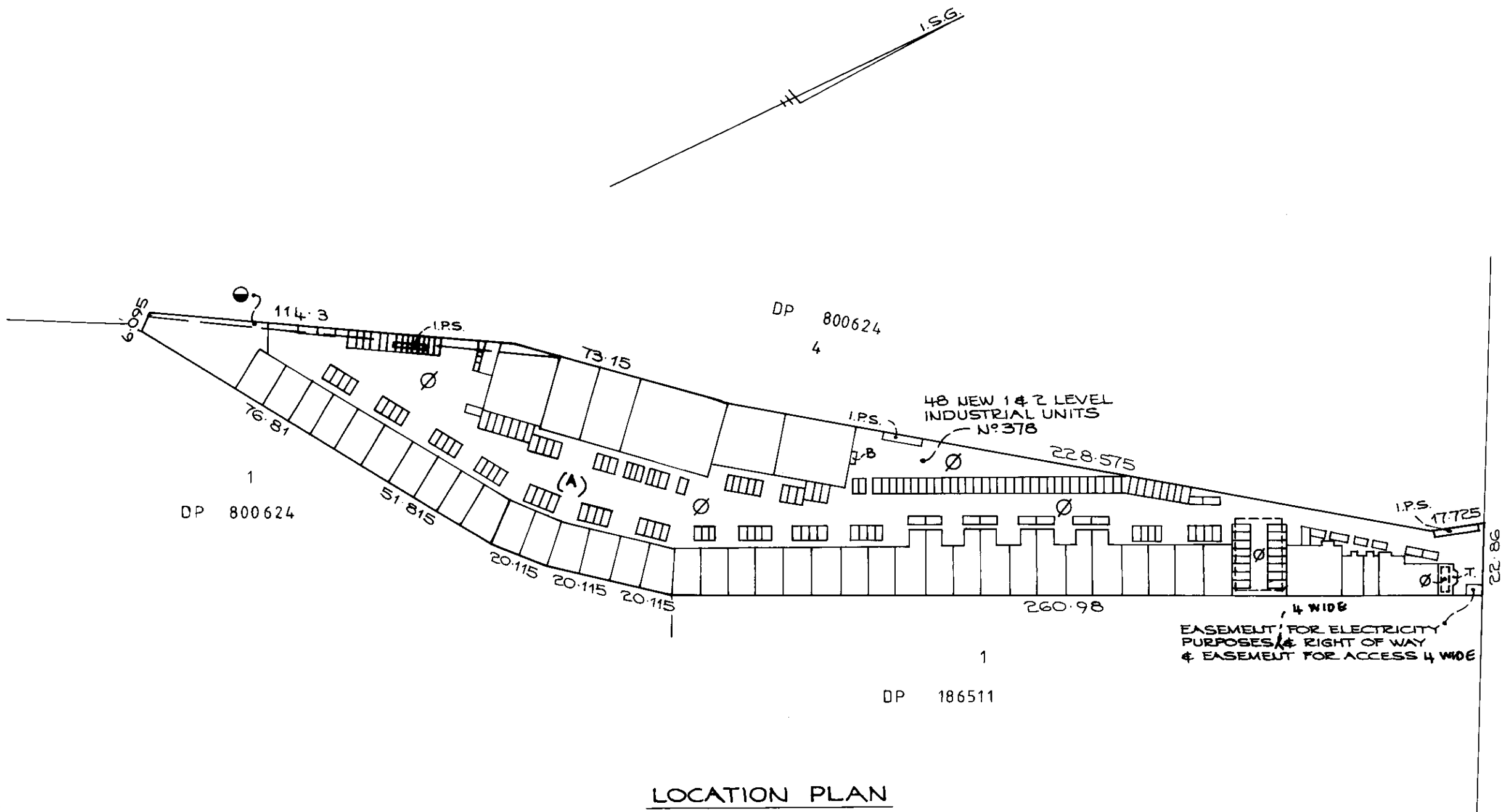
In Summary, main findings of the Due Diligence review are as follows:

- The site is located at 378 Parramatta Road, Homebush West within the Strathfield Municipal Council local government area. The site is legally described as CP SP60097 and is bounded by Parramatta Road to the north, Centenary Drive to the east and Railway track on west and south.
- The subject site is currently zoned as IN1 – General Industrial under the Strathfield Council Local Environmental Plan (LEP) 2012. Site is currently known as business park and being used for an Industrial land use purpose and has 53 onsite industrial units including office space. The site has vehicular access via left in left out driveway off Parramatta Road. Vehicular access is restricted to left in and left out only due to existing median on Parramatta Road fronting the subject site.
- Strathfield Council requires the development to provide 100% car parking on site. Provision of car parking should be in accordance with AS/NZS 2890.1:2004 Parking Facilities – Off-street car parking and AS/NZS 2890.2:2018 Parking Facilities – Off-street commercial vehicle facilities.
- Adequate parking for people with mobility disabilities and safe, easy, and convenient access to the building should be provided in accordance with AS/NZS 2890.6 – 2009.
- Based on real estate data obtained from Domain Website, traffic generation rates as per *"TfNSW Guide to Traffic Generating Developments"* and Technical Direction TDT 2013/04a the current traffic generation to and from the site is around 72 veh/hr in AM peak and 70 veh/hr in PM peak.
- TfNSW Guide to Traffic Generating Development states that, the incidence of linked and multi-purpose trips can reduce overall trip generation rates. Accordingly, suggested average discount of 20% has been applied to the total trip generation by the retail/ commercial of the development. It is considered reasonable to discount existing traffic from the total traffic generation for the proposed development. Hence, the **total traffic generation for the proposed development is estimated to be 82 veh/hr in AM peak and 64 veh/hr in PM peak**, which is marginally higher in AM peak and less in PM peak than the existing traffic generation. **The marginal increase in the traffic volumes** of 10 veh/hr in AM peak and decrease of 6 veh/hr in PM peak and left in and left out access arrangements off Parramatta Road will therefore **have insignificant impact on safety and efficiency of Parramatta Rd and surrounding road network**.
- At the time of preparing Due Diligence Technical Note, some gaps were identified in the data received. It is, therefore, recommended that more detailed traffic study should be undertaken at the development proposal stage to assess the impact of the proposed development on the surrounding road network which should include traffic volume survey on Parramatta Road and SIDRA intersection analysis.

<div><p>COUNCIL'S CERTIFICATE</p><p><b>STRATHFIELD</b> (Name of Council)</p><p>having satisfied itself that the requirements of the "Strata Schemes (Freehold Development) Act 1973 or "Strata Schemes (Leasehold Development) Act 1986 have been complied with, approves of the proposed:</p><p>*strata plan</p><p>*subdivision of land</p><p>illustrated in the annexure to this certificate.</p><p>* The strata plan/strata plan of subdivision is part of a development scheme. The council is satisfied that the plan is consistent with any conditions of any development consent and that the plan gives effect to the stage of the strata development contract to which it relates.</p><p>* The Council does not object to the encroachment of the building beyond the alignment of _____</p><p>* This approval is given on the condition that the use of lot(s) _____ (being utility lot/s designed to be used primarily for the storage or accommodation of boats, motor vehicles or goods and not for human occupation as a residence, office, shop or the like) is restricted to the proprietor or occupier of a lot or proposed lot (not being such a utility lot) the subject of the strata scheme concerned, as referred to in "section 39 of the Strata Schemes (Freehold Development) Act 1973 or "section 68 of the Strata Schemes (Leasehold Development) Act 1986.</p><p>Date: <b>6<sup>th</sup> APRIL 1999</b></p><p>Subdivision No. <b>30/9899</b> <i>Paul G Wilson</i></p><p>General Manager/Authorised Person</p></div>	<div><p>SURVEYOR'S CERTIFICATE</p><p><b>CHRISTOPHER C. ROBERTSON</b></p><p><b>5/6 B.H.BURGESS &amp; ASSOCIATES</b></p><p><b>P.O.BOX 245 OATLEY 2223</b></p><p>a surveyor registered under the Surveyors Act 1929, hereby certify that:</p><p>(1) each applicable requirement of "Schedule 1A to the Strata Schemes (Freehold Development) Act 1973 "Schedule 1A to the Strata Schemes (Leasehold Development) Act 1986 has been met.</p><p>(2) (a) the building encroaches on a public place - (b) the building encroaches on land (other than a public place) in respect of which an encroachment or appropriate easement has been created by registered - (c) is to be created under section 88B of the Conveyancing Act 1919.</p><p>(3) the survey information recorded in any accompanying location plan is accurate.</p><p>Signature: <i>C.C. Robertson</i></p><p>Date: <b>23/2/99</b></p><p>*Delete if inapplicable</p><p>*State whether dealing or plan, and quote registered number.</p><p>This is sheet 1 of my Plan in <b>10</b> sheets.</p></div>	<div><p>PLAN OF SUBDIVISION OF LOT 100 IN D.P. 872564</p><p><b>STRATHFIELD</b> <b>LGA AUBURN</b></p><p>Suburb/Locality: <b>HOME BUSH WEST</b></p><p>Parish: <b>LIBERTY PLAINS</b> County: <b>CUMBERLAND</b></p><p>Reduction Ratio <b>4:</b> _____ Lengths are in metres </p><p>Name of, and *address for service of notices on, the owners corporation</p><p>*Address required on original strata plan only.</p><p><b>THE OWNERS STRATA PLAN N° 60097</b> <b>N° 378 PARRAMATTA ROAD</b> <b>HOME BUSH WEST 2140</b></p></div>	<div><p><b>SP60097</b></p><p>Registered:  <b>4-5-1999</b></p><p>C.A.: <b>No. 30/9899 OF 6.4.1999</b></p><p>Purpose: <b>STRATA PLAN</b></p><p>Ref. Map: <b>U0045-22</b></p><p>Last Plan: <b>DP872564</b></p></div>
<div><p>Signatures, seals and statements of intention to create easements, restrictions on the use of land or positive covenants.</p><p>IT IS INTENDED TO CREATE PURSUANT TO SECTION 88(B) OF THE CONVEYANCING ACT 1919 - 1964 AS AMENDED AND SECTION 7(3) OF THE STRATA SCHEMES MANAGEMENT ACT 1996:</p><p>1. RESTRICTION AS TO USER</p><p>2. POSITIVE COVENANT</p><p>3. RIGHT OF WAY AND EASEMENT FOR ACCESS. <b>4 WIDE</b></p><p>4. EASEMENT FOR ELECTRICITY PURPOSES. <b>4 WIDE</b></p><p><i>S. R. E. Smith</i> <b>7TH</b> <b>APRIL 99</b></p><p><i>W. E. E. E. E.</i></p><p><i>DAAR PTY LIMITED</i></p><p></p><p><b>DEVELOPERS</b> <b>DAAR PTY LIMITED</b> (Inert type being adopted) Model By-laws adopted for this scheme</p><p>Keeping of Animals: Option A/B/C</p><p>*Schedule of By-laws in <b>5</b> sheets filed with plan</p><p>*No By-Laws apply</p><p>*Strike out whichever is inapplicable</p></div>		<div><p><b>FOR LOCATION PLAN</b></p><p><b>SEE SHEETS 2 &amp; 3</b></p></div>	

PLAN AMENDED IN LTD (AREAS OF LOTS 4, 43 & 48 & LGA & EASEMENTS WIDTHS)

Plan Drawing only to appear in this space



LOCATION PLAN  
(FOR LOCATION DETAILS SEE SHEET 3)

- T. DEVOTES TERRACE  
||| CARSPACE  
I.P.S. ILLUMINATED POLE SIGNAGE  
B. BALCONY  
Ø DETENTION AREA (RESTRICTION ON THE USE OF LAND)  
● COVENANT (VIDE TRANSFER N° 5284971 V)
- (A) RESERVATIONS & CONDITIONS IN THE CROWN GRANTS

Reduction Ratio 1:1500

Lengths are in metres

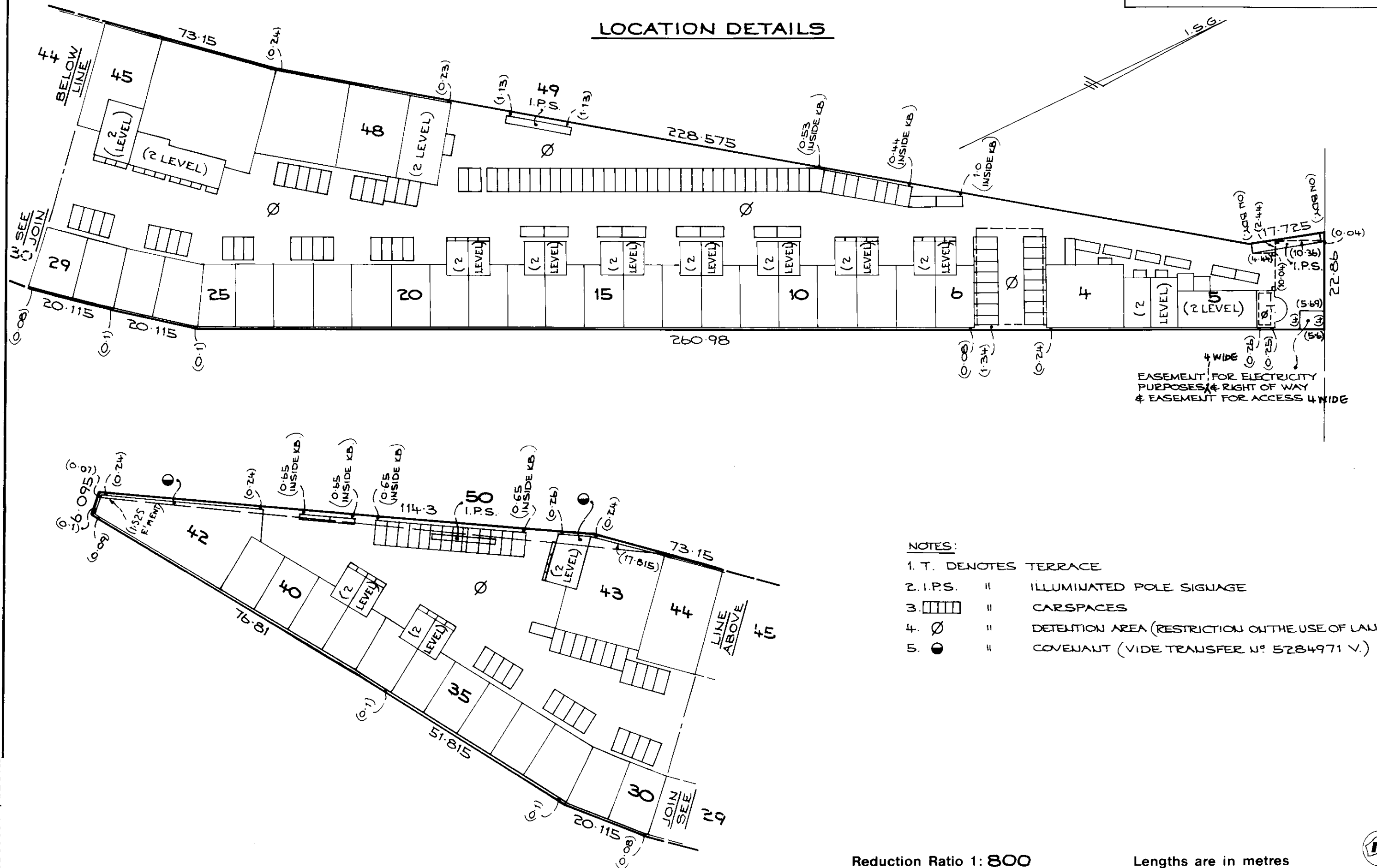
C. C. Robertson  
Surveyor Registered under Surveyors Act 1929

Authorised Person




SURVEYOR'S REFERENCE: 55081

## STRATA PLAN 60097

### LOCATION DETAILS



NOTES:

1. T. DENOTES TERRACE
2. I.P.S.     "     ILLUMINATED POLE SIGNAGE
3.      "     CARSPACES
4.      "     DETENTION AREA (RESTRICTION ON THE USE OF LAND)
5.      "     COVENANT (VIDE TRANSFER Nº 5284971 V.)

Reduction Ratio 1: 800

Lengths are in metres

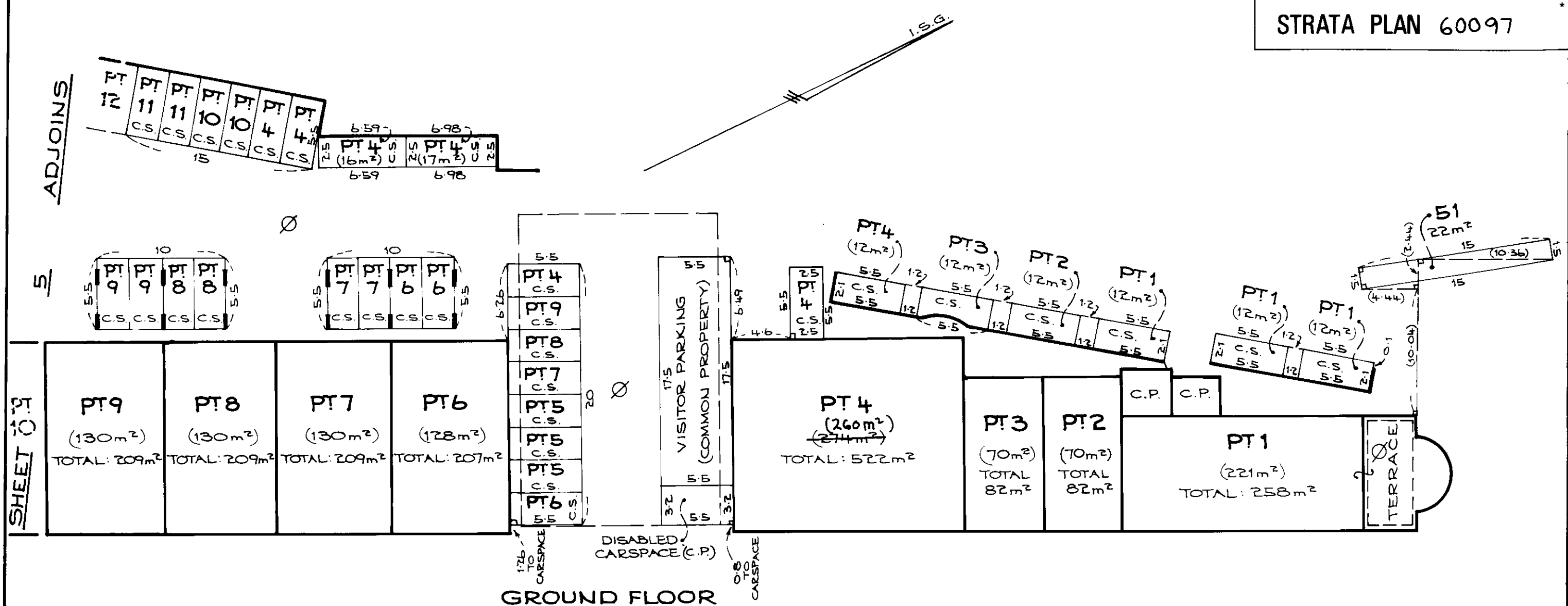
Surveyor Registered under Surveyors Act 1929

~~General Manager~~/Authorised Person

SURVEYOR'S REFERENCE: 55081

\*OFFICE USE ONLY

STRATA PLAN 60097



## SCHEDULE of UNIT ENTITLEMENTS

LOT N°	UNIT ENTITLEMENT	LOT N°	UNIT ENTITLEMENT	LOT N°	UNIT ENTITLEMENT
1	42	18	25	35	18
2	15	19	25	36	25
3	15	20	18	37	27
4	61	21	18	38	25
5	39	22	18	39	25
6	25	23	18	40	17
7	25	24	18	41	18
8	25	25	17	42	57
9	25	26	20	43	69
10	31	27	19	44	47
11	31	28	19	45	67
12	31	29	20	46	109
13	31	30	19	47	48
14	31	31	19	48	94
15	31	32	22	49	1
16	31	33	18	50	1
17	31	34	18	51	1
AGGREGATE				1500	

## NOTES

- C.P. DENOTES COMMON PROPERTY
- I.P.S. " ILLUMINATED POLE SIGNAGE
- R " RIGHT ANGLE
- AREAS INCLUDE THE TERRACE \* ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
- CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS (WHERE NOT COVERED)
- Ø DENOTES DETENTION AREA (RESTRICTION ON THE USE OF LAND)
- C.S. " CARSPACE
- " INSIDE FACE OF KERB (CARSPACES)
- " CENTRE OF COLUMN AND FACE OF COLUMN
- CARSPACES ARE 5.5 x 2.5 AND CONTAIN AREA OF 14m<sup>2</sup> UNLESS SHOWN OTHERWISE.
- THE TERRACE WHERE NOT COVERED IS RESTRICTED IN STRATUM TO 3.8 ABOVE THE UPPER SURFACE OF ITS FLOOR.
- LOT 51 IS LIMITED IN STRATUM TO 4 BELOW THE UPPER SURFACE OF THE MAIN GROUND FLOOR OF LOT 1 AND IS UNLIMITED IN HEIGHT.

Reduction Ratio 1: 300

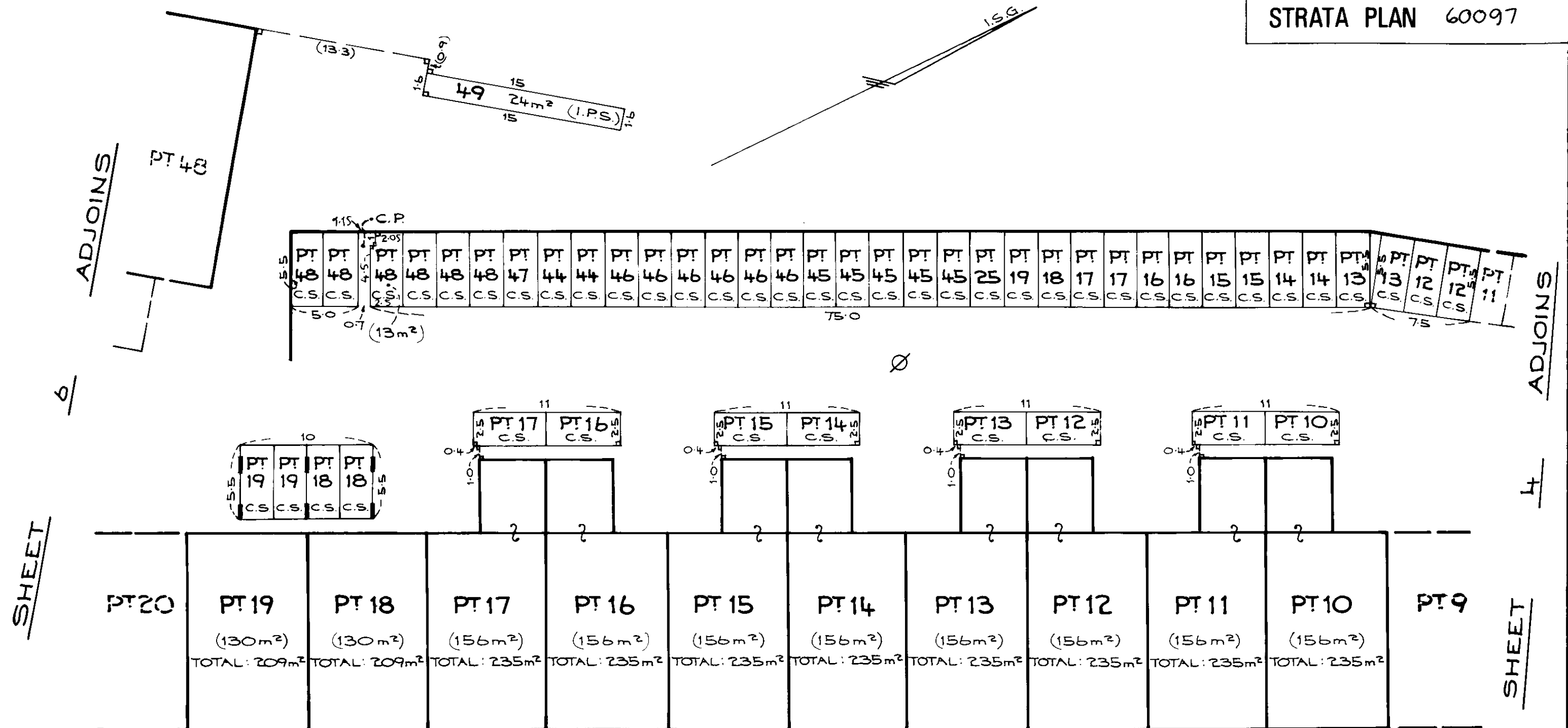
Lengths are in metres

Surveyor Registered under Surveyors Act 1929

General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081

\*OFFICE USE ONLY







GROUND FLOOR

LOTS 10 TO 19 & 49

CARSPACES LOTS 12 TO 19, 25, & 45 TO 48

NOTES

1. I.P.S. DENOTES ILLUMINATED POLE SIGNAGE
2.  RIGHT ANGLE
3. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
4. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS (WHERE NOT COVERED)
5. LOT 49 IS LIMITED IN STRATUM TO 5 BELOW THE UPPER SURFACE OF THE MAIN GROUND FLOOR OF LOT 48 AND IS UNLIMITED IN HEIGHT.
6.  DENOTES DETENTION AREA (RESTRICTION ON THE USE OF LAND)
7. CARSPACES ARE 5.5 x 2.5 AND CONTAIN AN AREA OF 14m<sup>2</sup> UNLESS SHOWN OTHERWISE.
8. C.S. DENOTES CAR SPACE
9.  DENOTES INSIDE FACE OF KERB (CAR SPACES)
10.  CENTRE OF COLUMN AND FACE OF COLUMNS.
11. C.P. DENOTES COMMON PROPERTY.

Reduction Ratio 1: 300

**Lengths are in metres**

Surveyor Registered under Surveyors Act 1929

~~General Manager~~/Authorised Person

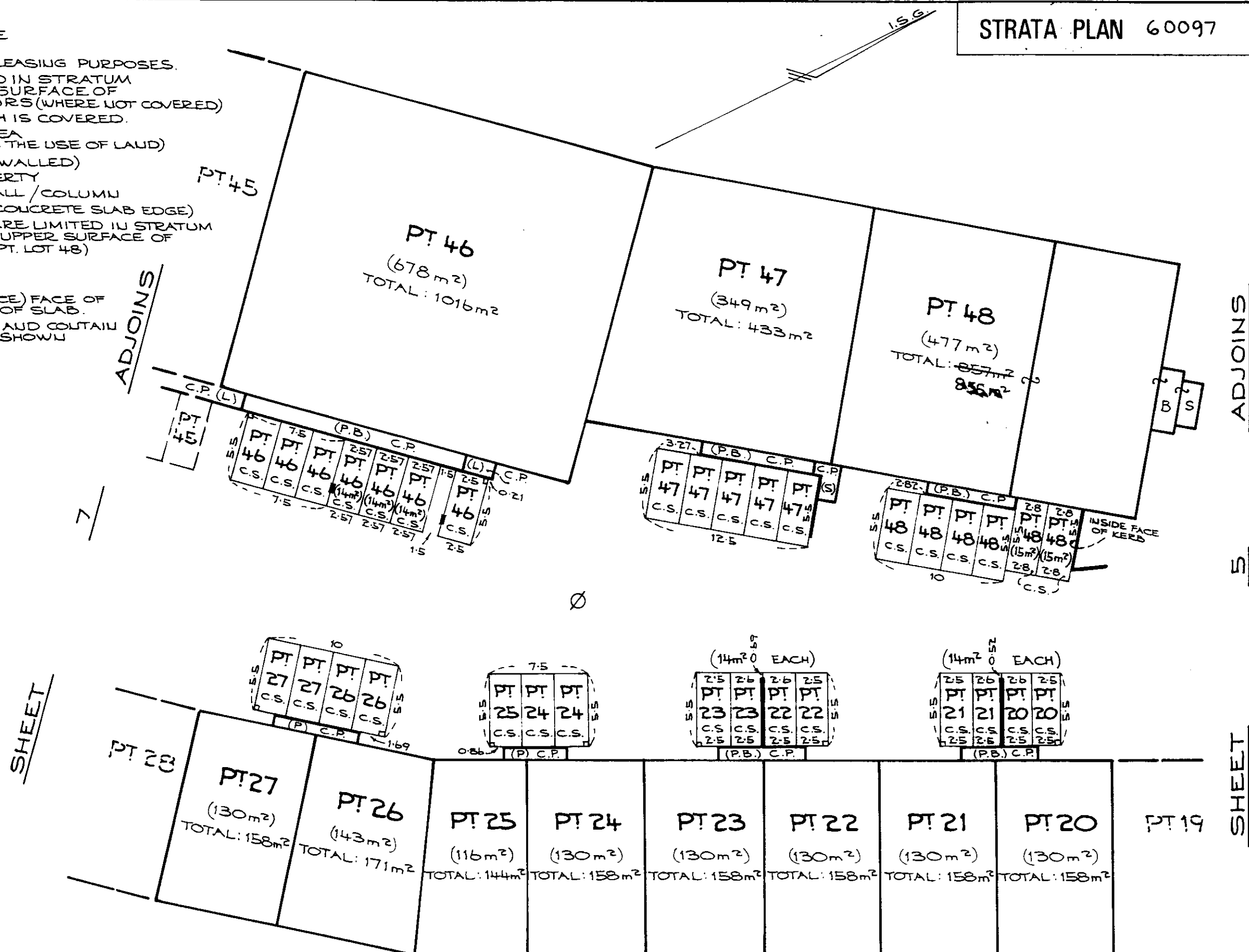
SURVEYOR'S REFERENCE: 55081



STRATA PLAN 60097

## NOTES

1.  $\perp$  DENOTES RIGHT ANGLE
2. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
3. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS (WHERE NOT COVERED)
4. B DENOTES BALCONY WHICH IS COVERED.
5.  $\emptyset$  " DETENTION AREA (RESTRICTION ON THE USE OF LAND)
6. P.B. " PLANTER BOX (WALLED)
7. C.P. " COMMON PROPERTY
8.  $\text{---}$  " CENTRE OF WALL / COLUMN
9. P. " PLANTER BED (CONCRETE SLAB EDGE)
10. S. " STAIRS WHICH ARE LIMITED IN STRATUM TO 3 ABOVE THE UPPER SURFACE OF THEIR TREADS (PT. LOT 48)
11. C.S. " CAR SPACE
12. L. " LANDING
13.  $\text{---}$  " INSIDE (CARSPACE) FACE OF WALL OR EDGE OF SLAB.
14. CARSPACES ARE 5.5 x 2.5 AND CONTAIN AN AREA OF 14m<sup>2</sup> UNLESS SHOWN OTHERWISE.



## GROUND FLOOR

LOTS 20 TO 27 & 46 TO 48  
CARSPACES LOTS 20 TO 27 & 46 TO 48

Reduction Ratio 1: 300

Lengths are in metres

C.C. Robertson  
Surveyor Registered under Surveyors Act 1929

Paul G. Wilson  
Authorised Person

SURVEYOR'S REFERENCE: 55081

\*OFFICE USE ONLY

STRATA PLAN 60097

## NOTES

1. C.P. DENOTES COMMON PROPERTY
2.  $\perp$  " RIGHT ANGLE
3. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
4. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS.
5.  $\emptyset$  DENOTES DETENTION AREA (RESTRICTION ON THE USE OF LAND)
6. L. " LANDING
7. P.B. " PLANTER BOX (WALLED)
8.  $\text{---}$  " INSIDE (CARSPACE) FACE OF WALL OR EDGE OF SLAB.
9.  $\text{---}$  " CENTRE OF COLUMN/WALL AND FACE OF COLUMN.
10. P. " PLANTER BED (CONCRETE SLAB EDGE)
11. C.S. " CARSPACE
12. CARSPACES ARE 5.5 x 2.5 AND CONTAIN AN AREA OF 14m<sup>2</sup> UNLESS SHOWN OTHERWISE.



Reduction Ratio 1: 300

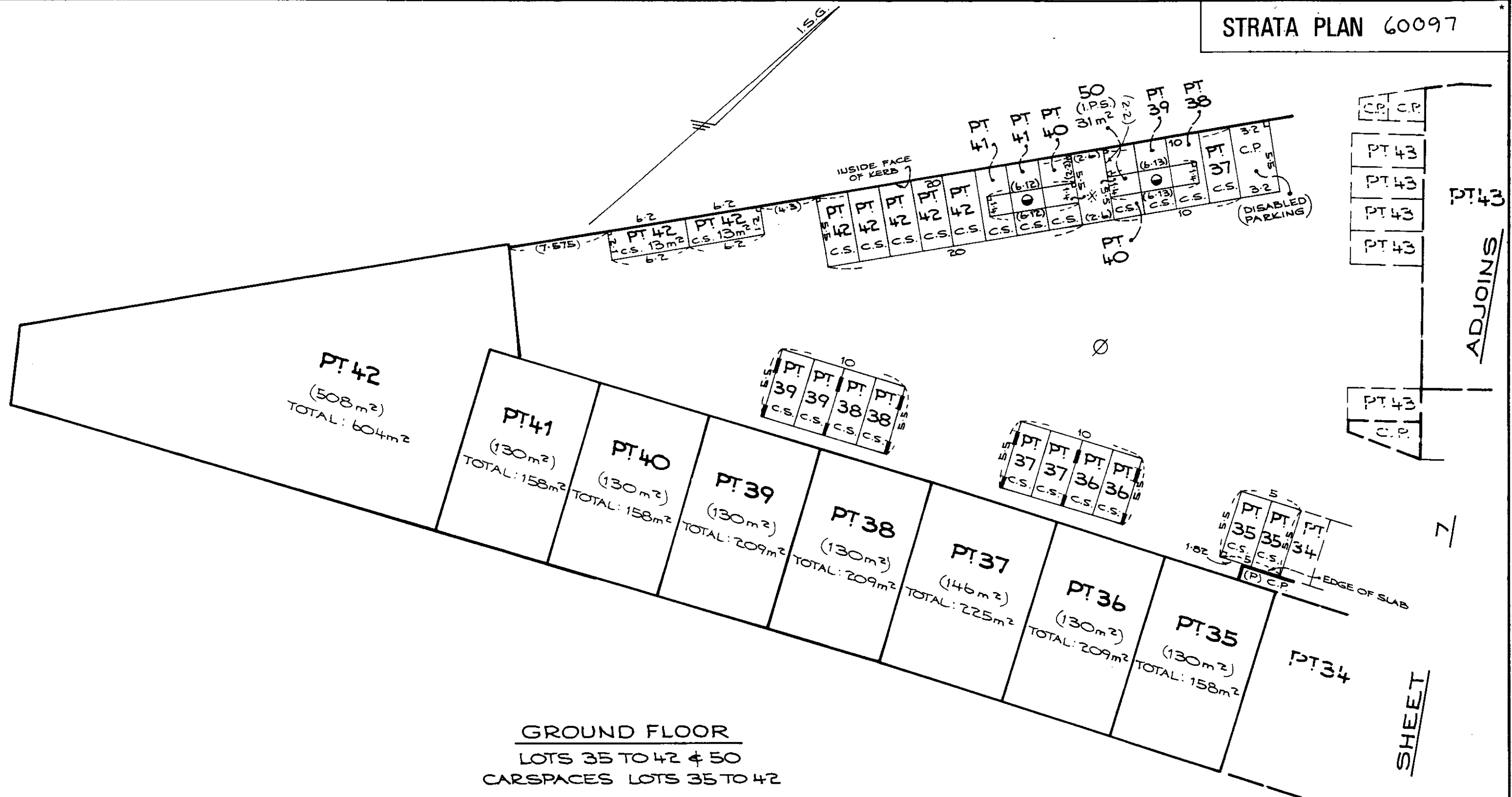
Lengths are in metres

C.C. Robinson  
Surveyor Registered under Surveyors Act 1929

Paul G. Whelan  
General Manager/Authorised Person

SURVEYOR'S REFERENCE 55081

## STRATA PLAN 60097



## NOTES

1. C.P. DENOTES COMMON PROPERTY
2.  $\perp$  " RIGHT ANGLE
3. I.P.S. " ILLUMINATED POLE SIGNAGE
4. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
5. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS. (UNLESS COVERED)
6. C.S. DENOTES CARSPACE
7.  $\emptyset$  " DEDICATION AREA (RESTRICTION ON THE USE OF LAND)
8.  $\bullet$  " CENTRE OF COLUMN AND FACE OF COLUMN.
9. P. " PLANTER BED (CONCRETE SLAB EDGE)
10.  $\odot$  " THESE PARTS OF LOT 50 ARE LIMITED IN STRATUM TO 2.55 ABOVE THE UPPER SURFACE OF THE RESPECTIVE FLOORS OF THE CARSPACES BELOW AND ARE UNLIMITED IN HEIGHT.
11.  $\times$  " THAT THIS PART OF LOT 50 IS LIMITED IN STRATUM TO 3 BELOW THE UPPER SURFACE OF THE FLOOR LEVEL OF CARSPACE PT. LOT 40 ADJOINING TO THE NORTHEAST AND IS UNLIMITED IN HEIGHT.
12. CARSPACES ARE 5.5 X 2.5 AND CONTAIN AN AREA OF 14m<sup>2</sup> UNLESS SHOWN OTHERWISE.

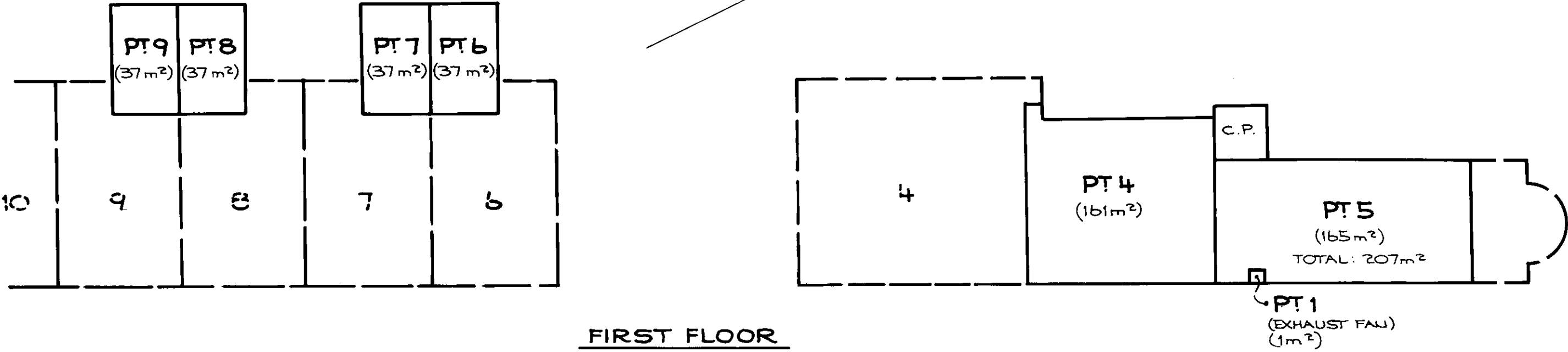
Reduction Ratio 1:300

Lengths are in metres

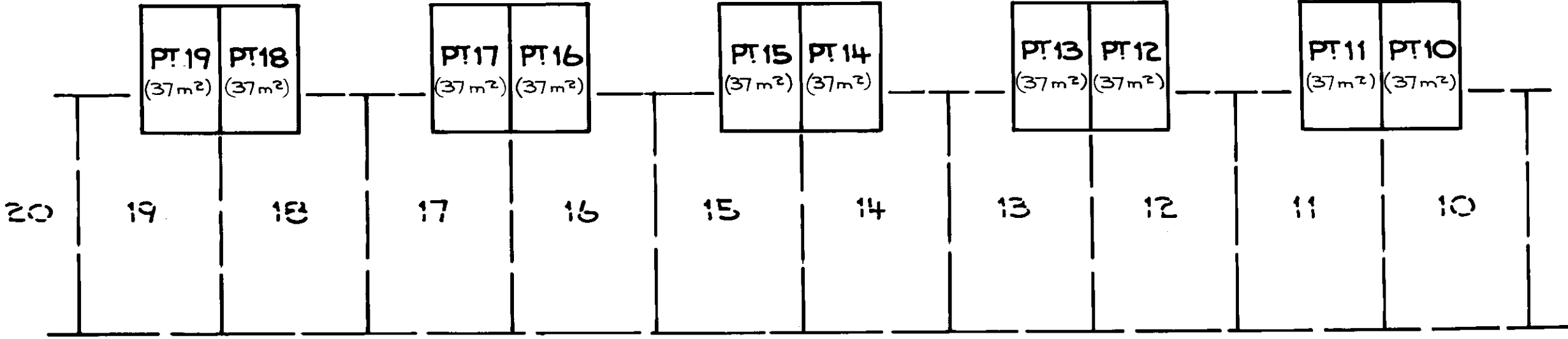
Surveyor Registered under Surveyors Act 1929

General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081



FIRST FLOOR



FIRST FLOOR

NOTES

- 1. C.P. DENOTES COMMON PROPERTY.
- 2. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.

Reduction Ratio 1: 300

Lengths are in metres

C.C. Raut  
Surveyor Registered under Surveyors Act 1929

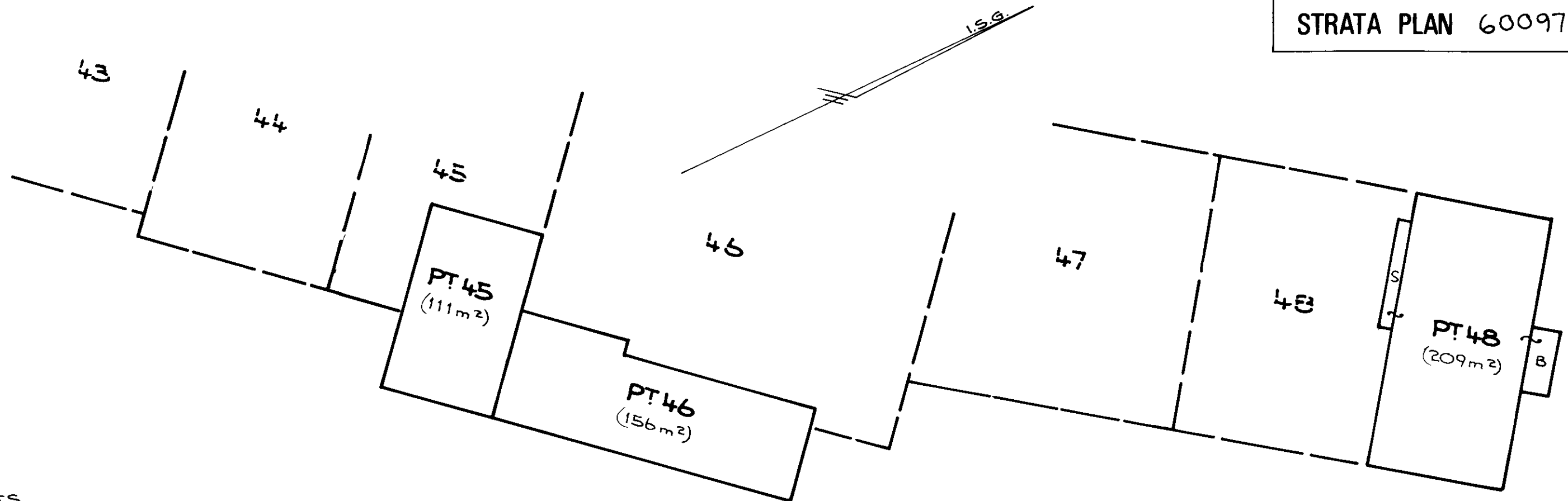
General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081



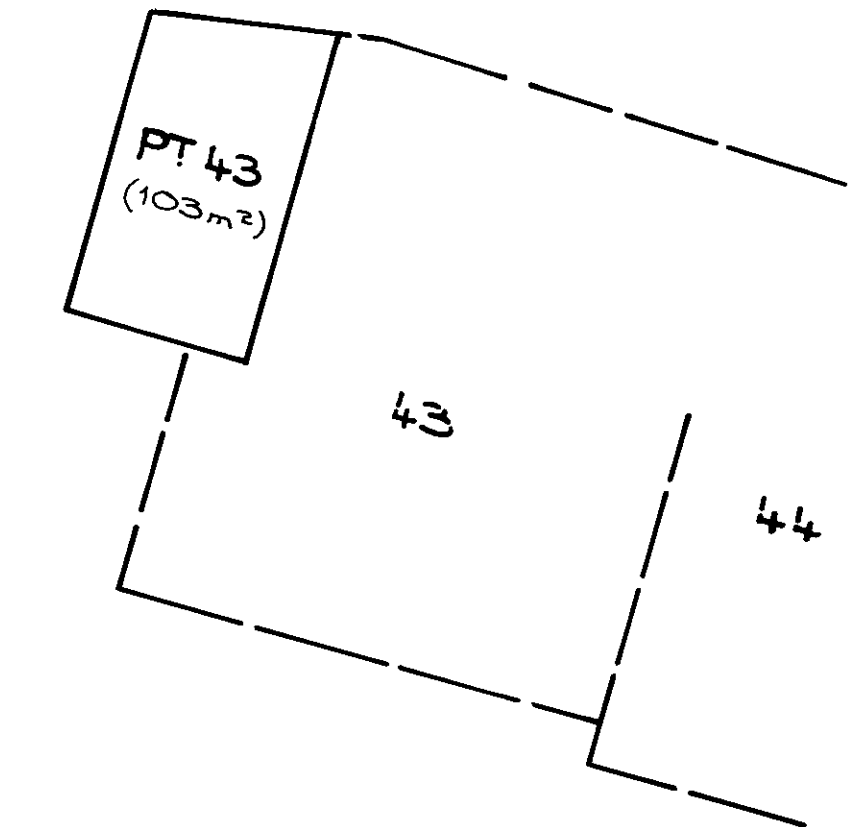
\*OFFICE USE ONLY

STRATA PLAN 60097



## NOTES.

1. AREAS ARE APPROXIMATE AND INCLUDE THE BALCONY AND ARE NOT SUITABLE FOR LEASING PURPOSES.
2. B. DENOTES BALCONY
3. S. II STAIRS (INTERNAL)
4. BALCONY WHERE NOT COVERED IS LIMITED IN STRATUM TO 2.7 ABOVE THE UPPER SURFACE OF ITS FLOOR.

FIRST FLOORFIRST FLOOR

Reduction Ratio 1: 300

Lengths are in metres

*C.C. Robertson*  
Surveyor Registered under Surveyors Act 1929

*[Signature]*  
General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081

\*OFFICE USE ONLY



## Form 27

Strata Schemes (Freehold Development) Act 1973

## By-Laws

**Instrument setting out the terms of by-laws to be created upon registration of the strata plan.**

**1. Vehicles**

- (1) An owner or occupier of a lot must not park or stand any motor or other vehicle on common property or permit any invitees of the owner or occupier to park or stand any motor or other vehicle on common property except with the prior written approval of the owners corporation.
- (2) The owners corporation must not unreasonably withhold its approval to the parking or standing of a motor vehicle on the common property.
- (3) An owner or occupier shall not park or stand any motor or other vehicle upon a car parking space reserved for disabled persons unless the driver of the vehicle is the holder of a current disabled drivers' permit and such permit is displayed in a prominent position within the vehicle at all times whilst such vehicle is parked in a disabled car space.
- (4) An owner or occupier of a lot shall ensure that all vehicles entering or leaving the common property shall do so in a forward direction only. The reversing of vehicles within the common property shall be restricted to only such as maybe necessary for the turning of vehicles to permit travel in a forward direction.

**2. Car spaces**

An owner or occupier of a lot may use the car spaces which form part of the lot only for the parking of motor vehicles and in particular shall not use any car space for the storage of materials or goods of any nature.

**3. Obstruction and use of common property**

- (1) An owner or occupier of a lot must not obstruct lawful use of common property by any person except on a temporary and non-recurring basis.
- (2) An owner or occupier shall not use any part of the common property for the storage of materials or goods of any nature.
- (3) An owner or occupier of a lot shall not use any common property water supply or apparatus for any purpose, other than in the case of emergency, without the prior written consent of the owners corporation.

**4. Damage to common property**

- (1) An owner or occupier of a lot must not mark, paint, drive nails or screws or the like into, or otherwise damage or deface, any structure that forms part of the common property except with the prior written consent of the owners corporation.
- (2) An approval given by the owners corporation under sub-clause (1) cannot authorise any additions to the common property.
- (3) This by-law does not prevent an owner or person authorised by an owner from installing:
  - (a) any locking or other safety device for protection of the owner's lot against intruders or to improve safety within the owner's lot, or

- (b) any screen or other device to prevent entry of animals or insects on the lot, or
- (c) any sign to advertise the activities of the occupier of the lot, or
- (d) any device used to affix decorative items to the internal surfaces of walls in the owner's lot.

- (4) Any such locking or safety device, screen, other device or sign must be installed in a competent and proper manner and must have an appearance, after it has been installed, consistent with any guidelines established by the owners corporation about such installations or, in the absence of guidelines, in keeping with the appearance of the rest of the building.

- (5) Despite Section 62 of Strata Schemes Management Act, the owner of a lot must:

- (a) maintain and keep in a state of good and serviceable repair any installation referred to in sub-clause (3) that forms part of the common property and that services the lot, and
- (b) repair any damage caused to any part of the common property by the installation or removal of any locking or safety device, screen, other device referred to in sub-clause (3) that forms part of the common property and that services the lot.

**5. Children on common property**

An owner or occupier of a lot must not permit any child of whom the owner or occupier has control to remain on common property, unless accompanied by an adult exercising effective control.

**6. Behaviour of invitees**

An owner or occupier of a lot must take all reasonable steps to ensure that invitees of the owner or occupier do not behave in a manner likely to interfere with the peaceful enjoyment of the owner or occupier of another lot or any person lawfully using common property; and shall take all reasonable measures to ensure that invitees of the owner or occupier comply with these by-laws.

**7. Depositing rubbish and other material on common property**

An owner or occupier of a lot must not deposit or throw on the common property any rubbish, dirt, dust or other material or discarded item except with the prior written approval of the owners corporation.

**8. Cleaning windows and doors**

An owner or occupier of a lot must keep clean all exterior surfaces of glass in windows and doors on the boundary of the lot, including so much as is common property, unless:

- (a) the owners corporation resolves that it will keep the glass or specified part of the glass clean, or
- (b) that glass or part of the glass cannot be accessed by the owner or occupier of the lot safely or at all.

**9. Garbage disposal**

- (1) An owner or occupier of a lot in a strata scheme that does not have shared receptacles for garbage, recyclable material or waste:



- (a) must maintain such receptacles within the lot, or on such part of the common property as may be authorised by the owners corporation, in clean and dry condition and (except in the case of receptacles for recyclable material) adequately covered, and
  - (b) must ensure that before refuse, recyclable material or waste is placed in the receptacles it is, in the case of refuse, securely wrapped or, in the case of tins or other containers, completely drained, or, in the case of recyclable material or waste, separated and prepared in accordance with the applicable recycling guidelines, and
  - (c) for the purpose of having the garbage, recyclable material or waste collected, must place the receptacles within an area designated for that purpose by the owners corporation and at a time not more than 12 hours before the time at which garbage, recyclable material or waste is normally collected, and
  - (d) when the garbage, recyclable material or waste has been collected, must promptly return the receptacles to the lot or other area referred to in paragraph (a), and
  - (e) must not place any thing in the receptacles of the owner or occupier of any other lot except with the permission of that owner or occupier, and
  - (f) must promptly remove any thing which the owner, occupier or garbage or recycling collector may have spilled from the receptacles and must take such action as may be necessary to clean the area within which that thing was spilled.
- (2) Sub-clause (1) does not require an owner or occupier of a lot to dispose of any chemical, biological, toxic or other hazardous waste in a manner that would contravene any relevant law applying to the disposal of such waste.
- (3) An owner or occupier of a lot in a strata scheme that has shared receptacles for garbage, recyclable material or waste:
- (a) must ensure that before refuse, recyclable material or waste is placed in the receptacles it is, in the case of refuse, securely wrapped or, in the case of tins or other containers, completely drained, or, in the case of recyclable material or waste, separated and prepared in accordance with the applicable recycling guidelines, and
  - (b) must promptly remove any thing which the owner, occupier or garbage or recycling collector may have spilled in the area of the receptacles and must take such action as may be necessary to clean the area within which that thing was spilled.
- (4) Sub-clause (3) does not require an owner or occupier of a lot to dispose of any chemical, biological, toxic or other hazardous waste in a manner that would contravene any relevant law applying to the disposal of such waste.

#### 10. Appearance of lot

The owner or occupier of a lot must not, without the prior written approval of the owners corporation, maintain within the lot anything visible from outside the lot that, viewed from outside the lot, is not in keeping with the rest of the building.

#### 11. Change in use of lot to be notified

An occupier of a lot must notify the owners corporation if the occupier changes the existing use of the lot in a way that may affect the insurance premiums for

the strata scheme (for example, if the change of use results in a hazardous activity being carried out on the lot).

#### 12. Preservation of fire safety

- (1) The owner or occupier of a lot must not do any thing or permit any invitees of the owner or occupier to do any thing on the lot or common property that is likely to affect the operation of fire safety devices in the parcel or to reduce the level of fire safety in the lots or common property.
- (2) An owner or occupier of a lot will not use any fire safety apparatus, hydrant, or hose reel for any purpose other than the control of fire or other emergency occurrence, nor place any vehicle, goods, or materials in any location which may impede access to, use of, or serviceability of any fire safety apparatus, hydrant, or hose reel.

#### 13. Prevention of hazards

The owner or occupier of a lot must not do any thing or permit any invitees of the owner or occupier to do any thing on the lot or common property that is likely to create a hazard or danger to the common property or to the owner or occupier of another lot or any person lawfully using the common property.

#### 14. Provision of amenities or services

- (1) The owners corporation may, by special resolution, determine to enter into arrangements for the provision of the following amenities or services to one or more of the lots, or to the owners or occupiers of one or more of the lots:
  - (a) security services,
  - (b) promotional services,
  - (c) cleaning,
  - (d) garbage disposal and recycling services,
  - (e) electricity, water or gas supply,
  - (f) telecommunication services (for example, cable television).
  - (g) such other, amenities and support services as the owners corporation may resolve.
- (2) If the owners corporation makes a resolution referred to in sub-clause (1) to provide an amenity or service to a lot or to the owner or occupier of a lot, it must indicate in the resolution the amount for which, or the conditions on which, it will provide the amenity or service.

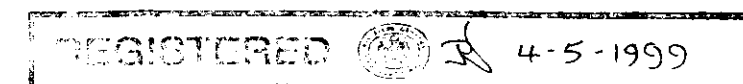
#### 15. Management

The executive committee shall be authorised and empowered on behalf of the owners corporation to enter into such agreements and arrangements as it may resolve to be appropriate for the management, control, administration and security of any buildings or other common property for such periods and upon such terms as the executive committee may determine.

The Common Seal of Daar Pty )  
Limited was hereunto affixed )  
by authority of the Directors in )  
the presence of:

Director

) Secretary



SIGNED IN MY PRESENCE BY

DARREN JOHN WISSAM

MANAGER SETTLEMENTS

of the Commonwealth Bank of Australia.  
the duly constituted Attorney of the said  
bank who is personally known to me.

N. DWYER

16-24 Elsie St. Burnwood.

COMMONWEALTH BANK OF AUSTRALIA by its attorney  
who is MANAGER SETTLEMENTS  
for the time being at Sydney and who is the attorney  
mentioned and referred to in Power of Attorney registered  
in the LAND TITLES OFFICE Book 4049 No. 321.

DARREN JOHN WISSAM

SP60097

REGISTERED  R 4-5-1999

SHEET 5 OF 5 SHEETS



(A) COVENANT (5284971)  
(B) -RIGHT OF WAY& EASEMENT FOR ACCESS 4 METERS WIDE(SP60097)  
-EASEMENT FOR ELECTRICITY PURPOSES 4 METERS WIDE(SP60097)



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No Investigation of Underground services has been made. All relevant Authorities should be notified prior to any excavation on or near the site.

Developers & Excavators may be held financially responsible by the asset owner should they damage underground networks.

NOTE:

BOUNDARIES SHOULD BE MARKED PRIOR TO ANY WORKS BEING CARRIED OUT ON OR NEAR THE BOUNDARIES.

THIS PLAN IS PREPARED FOR DETAIL AND LEVEL PURPOSES ONLY AND AS SUCH

DIMENSIONS AND AREAS ARE COMPILED FROM PLANS AVAILABLE FROM LRS. THE BEARINGS ON THESE PLAN BOUNDARIES ARE FROM LAND TITLE OFFICE PLANS.

NO COVENANTS AND/OR RESTRICTIONS HAVE BEEN INVESTIGATED

THESE NOTES ARE AN INTEGRAL PART OF THE PLAN AND MUST NOT BE ERASED.

ANY STRUCTURES RELATED TO PHYSICAL FEATURES (BUILDINGS, TREES, ETC.) MUST BE CONFIRMED PRIOR TO FINAL DESIGN.

ALL SERVICES MUST BE VERIFIED BY THE CONTRACTOR PRIOR TO CONSTRUCTION.

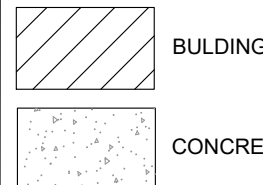
DISCLAIMER OF LIABILITIES TO ANY THIRD PARTIES : This Plan is made solely for the use and benefit of the client named and no liability or responsibility whatsoever is accepted to any third party who may rely on this Plan wholly or in part. Any third parties acting or relying of this Plan whether wholly or in part are in breach of our copyright and do so at their own risk.



ISG



LEGENDS :



WT : WINDOW TOP  
WB : WINDOW BOTTOM  
C : COMMUNICATION PIT  
H : STOP VALVE  
HY : HYDRANT  
WM : WATER METER  
PP : POWER POLE  
SS : SIGN STREET  
LP : LIGHT POLE

**BAISSLINE**  
SURVEYING

baisslinesurveying.com.au  
adrian@baisslinesurveying.com.au  
0432 648 475

TITLE  
DETAIL SURVEY STRATA PLAN 60097  
NO.378 PARRAMATTA ROAD, HOMEBUSH WEST

CLIENT  
STRATA PLAN 60097

SCALE  
1:700@ A1

Origin of Levels  
SSM 58095  
RL 16.885 (AHD)

DATE  
15-6-2024

DRAWING No.  
1

SHEET  
1  
OF  
5 SHEETS

JOB REFERENCE  
PARRA-DET

AMENDMENTS

DATE	DESCRIPTION



ISG



LOT 2  
DP 883809

SP 60097  
AREA 18210 m<sup>2</sup> (BY TITLE)

DOUBLE STOREY  
RENDER  
STRATA BUILDING

CONCRETE DRIVEWAY

DOUBLE STOREY  
RENDER  
STRATA BUILDING

*[Handwritten Signature]*

SAM PYRUZ  
REGISTERED LAND SURVEYOR NSW

DATE

SP 87671



www.1100.com.au

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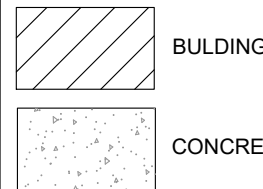
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LEGENDS :



WT : WINDOW TOP  
WB : WINDOW BOTTOM  
[Symbol] : COMMUNICATION PIT  
[Symbol] : HYDRANT  
[Symbol] : STOP VALVE  
[Symbol] : WATER METER  
[Symbol] : POWER POLE  
[Symbol] : SIGN STREET  
[Symbol] : LIGHT POLE

 baisslinesurveying.com.au adrian@baisslinesurveying.com.au 0432 648 475	TITLE DETAIL SURVEY STRATA PLAN 60097 NO.378 PARRAMATTA ROAD, HOMEBUSH WEST				SHEET 2 OF  5 SHEETS  PARRA-DET	AMENDMENTS	
	CLIENT  STRATA PLAN 60097					DATE	DESCRIPTION
SCALE 1:250@ A1	Origin of Levels SSM 58095 RL 16.885 (AHD)	DATE 15-6-2024	DRAWING No. 1				





LOT 2  
DP 883809

SP 60097  
AREA 18210 m<sup>2</sup> (BY TITLE)

DOUBLE STOREY  
RENDER  
STRATA BUILDING

CONCRETE DRIVEWAY



No Investigation of Underground services has been made. All relevant Authorities should be notified prior to any excavation on or near the site.

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LEGENDS :	
	BUILDING
	CONCRETE
WT :	WINDOW TOP
WB :	WINDOW BOTTOM
	COMMUNICATION PIT
	STOP VALVE
	HYDRANT
	WATER METER
	POWER POLE
	SIGN STREET
	LIGHT POLE

 baisslinesurveying.com.au adrian@baisslinesurveying.com.au 0432 648 475	TITLE DETAIL SURVEY STRATA PLAN 60097 NO.378 PARRAMATTA ROAD, HOMEBUSH WEST			SHEET 3 OF  5 SHEETS	AMENDMENTS	
	CLIENT  STRATA PLAN 60097				DATE	DESCRIPTION
				JOB REFERENCE  PARRA-DET		
SCALE 1:250@ A1	Origin of Levels SSM 58095 RL 16.885 (AHD)	DATE 15-6-2024	DRAWING No. 1			



MULTI STOREY  
BRICK BUILDING



LOT 1  
DP 1184509



[www.1100.com.au](http://www.1100.com.au)

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BOUNDARIES SHOULD BE MARKED PRIOR TO ANY WORKS BEING CARRIED OUT ON OR NEAR THE BOUNDARIES.

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DIMENSIONS AND AREAS ARE COMPILED FROM PLANS AVAILABLE FROM LRS. THE BEARINGS ON THESE PLAN BOUNDARIES ARE FROM LAND TITLE OFFICE PLANS.

NO COVENANTS AND/OR RESTRICTIONS HAVE BEEN INVESTIGATED

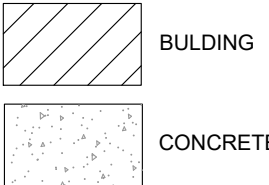
THESE NOTES ARE AN INTEGRAL PART OF THE PLAN AND MUST NOT BE ERASED.

ANY STRUCTURES RELATED TO PHYSICAL FEATURES (BUILDINGS, TREES, ETC.) MUST BE CONFIRMED PRIOR TO FINAL DESIGN.

ALL SERVICES MUST BE VERIFIED BY THE CONTRACTOR PRIOR TO CONSTRUCTION.

DISCLAIMER OF LIABILITIES TO ANY THIRD PARTIES : This Plan is made solely for the use and benefit of the client named and no liability or responsibility whatsoever is accepted to any third party who may rely on this Plan wholly or in part. Any third parties acting or relying of this Plan whether wholly or in part are in breach of our copyright and do so at their own risk.

LEGENDS :



WT : WINDOW TOP  
WB : WINDOW BOTTOM  
CP : COMMUNICATION PIT  
SV : STOP VALVE  
H : HYDRANT  
WM : WATER METER  
PP : POWER POLE  
SS : SIGN STREET  
LP : LIGHT POLE



[baisslinesurveying.com.au](http://baisslinesurveying.com.au)  
[adrian@baisslinesurveying.com.au](mailto:adrian@baisslinesurveying.com.au)  
0432 648 475

TITLE  
DETAIL SURVEY STRATA PLAN 60097  
NO.378 PARRAMATTA ROAD, HOMEBUSH WEST

CLIENT  
STRATA PLAN 60097

SCALE  
1:250@ A1

Origin of Levels  
SSM 58095  
RL 16.885 (AHD)

DATE  
15-6-2024

DRAWING NO.  
1

SHEET  
4  
OF

5 SHEETS

JOB REFERENCE  
PARRA-DET

AMENDMENTS

DATE	DESCRIPTION



ISG



PARRAMATTA

ROAD

BM NAIL IN KERB  
RL 16.79 (AHD)

16°18'20" 17.725  
116°57'20" 22.86

DOUBLE STOREY  
RENDER/GLASS  
OFFICE  
NO.378

MULTI STOREY  
BRICK BUILDING

CONCRETE DRIVEWAY

CONCRETE DRIVEWAY

35°50'50" 228.575



www.1100.com.au

No Investigation of Underground services has been made. All relevant Authorities should be notified prior to any excavation on or near the site.

Developers & Excavators may be held financially responsible by the asset owner should they damage underground networks.

NOTE:

BOUNDARIES SHOULD BE MARKED PRIOR TO ANY WORKS BEING CARRIED OUT ON OR NEAR THE BOUNDARIES.

THIS PLAN IS PREPARED FOR DETAIL AND LEVEL PURPOSES ONLY AND AS SUCH

DIMENSIONS AND AREAS ARE COMPILED FROM PLANS AVAILABLE FROM LRS. THE BEARINGS ON THESE PLAN BOUNDARIES ARE FROM LAND TITLE OFFICE PLANS.

NO COVENANTS AND/OR RESTRICTIONS HAVE BEEN INVESTIGATED

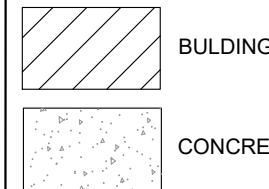
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LEGENDS :



WT : WINDOW TOP  
WB : WINDOW BOTTOM  
[Symbol] : COMMUNICATION PIT  
[Symbol] : STOP VALVE  
[Symbol] : HYDRANT  
[Symbol] : WATER METER  
[Symbol] : POWER POLE  
[Symbol] : SIGN STREET  
[Symbol] : LIGHT POLE



baisslinesurveying.com.au  
adrian@baisslinesurveying.com.au  
0432 648 475

TITLE  
DETAIL SURVEY STRATA PLAN 60097  
NO.378 PARRAMATTA ROAD, HOMEBUSH WEST

CLIENT  
STRATA PLAN 60097

SCALE  
1:250@ A1

Origin of Levels  
SSM 58095  
RL 16.885 (AHD)

DATE  
15-6-2024

DRAWING NO.  
1

SHEET  
5  
OF

5 SHEETS

PARRA-DET

AMENDMENTS

DATE DESCRIPTION





PARRAMATTA ROAD

LOCATION PLAN

**Lengths are in metres**

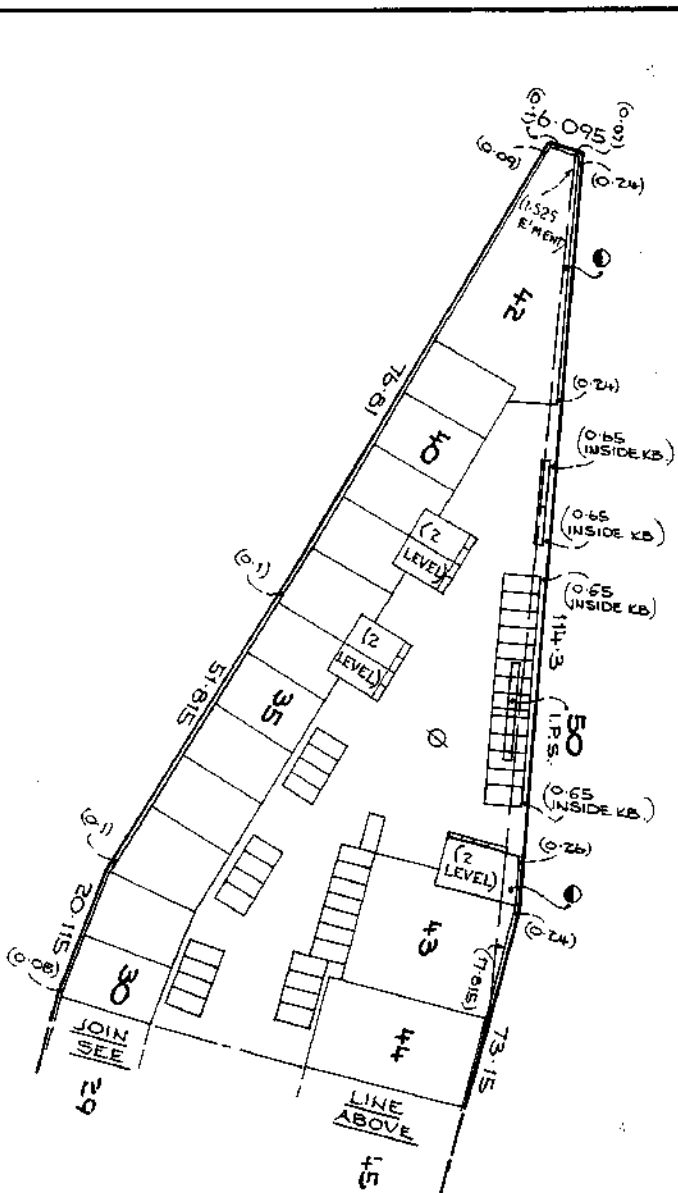
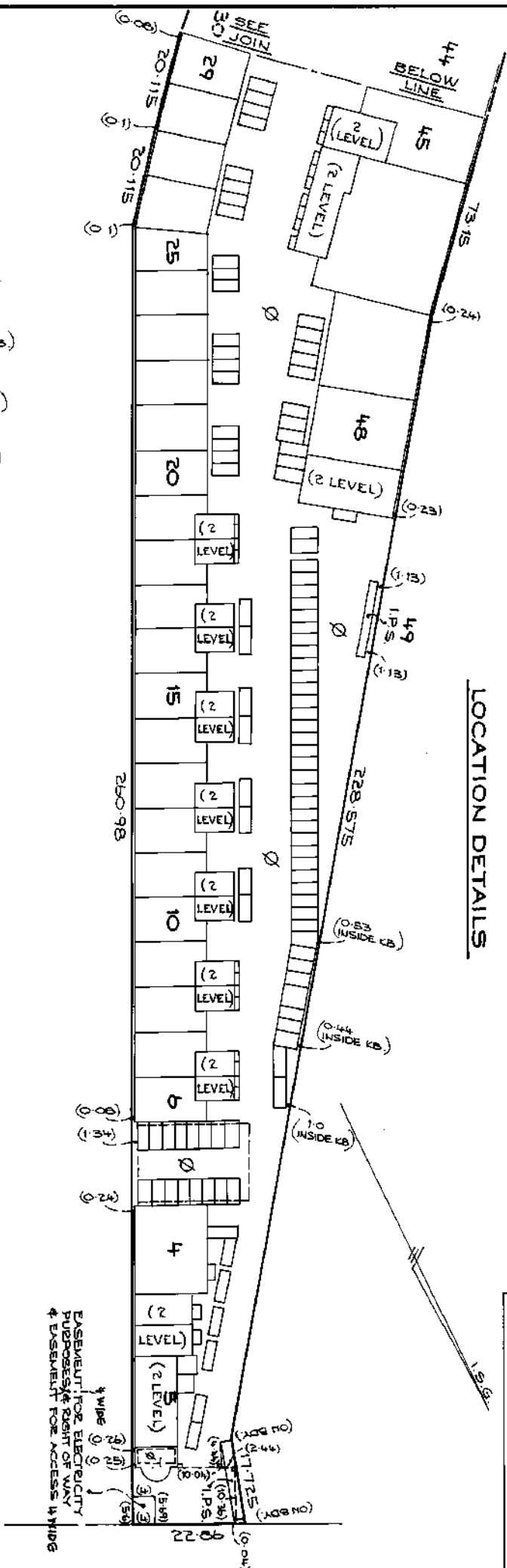
Surveyor Registered under Surveyors Act 1929  
SURVEYOR'S REFERENCE: 55081

Surveyor Registered under Surveyors Act 1929

**Confidentiality Waiver/Authorized Person**

STRAITA PLAN 60097

LOCATION DETAILS



NOTES:

1. T. DENOTES TERRACE
2. I.P.S. " ILLUMINATED POLE SIGNAGE
3. " " CARSPACES
4. " " DETENTION AREA (RESTRICTION ON THE USE OF LAND)
5. " " COVENANT (VIDE TRANSFER W/ 5284971 V)

Reduction Ratio 1: 800

Lengths are in metres

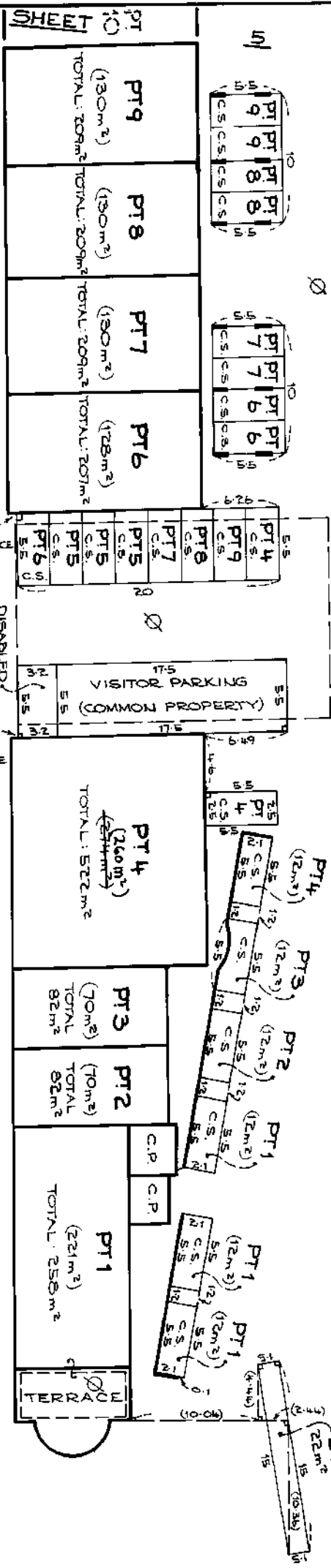
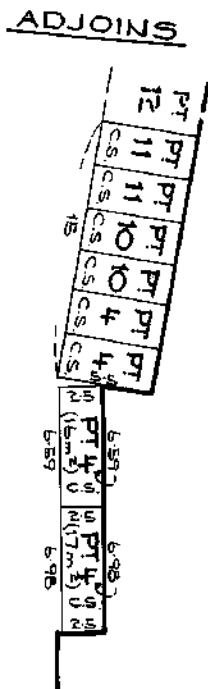


C.C. Robertson

Surveyor Registered under Surveyors Act 1929

General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081



GROUND FLOOR

LOTS 1-4, 6-9, 51  
4 CARSPACES LOTS 1-11 INCLUSIVE

SCHEDULE OF UNIT ENTITLEMENTS

LOT N°	UNIT ENTITLEMENT	LOT N°	UNIT ENTITLEMENT	LOT N°	UNIT ENTITLEMENT
1	12	18	25	35	18
2	15	19	25	36	25
3	15	20	18	37	27
4	61	21	18	38	25
5	39	22	18	39	25
6	25	23	18	40	17
7	25	24	18	41	18
8	25	25	17	42	57
9	25	26	20	43	69
10	31	27	19	44	47
11	31	28	19	45	67
12	31	29	20	46	109
13	31	30	19	47	48
14	31	31	19	48	94
15	31	32	22	49	1
16	31	33	18	50	1
17	31	34	18	51	1
				AGGREGATE	1500

NOTES

1. C.P. DENOTES COMMON PROPERTY
2. I.P.S. ILLUMINATED POLE SIGNAGE
3. L.R. RIGHT ANGLE
4. AREAS INCLUDE THE TERRACE \*ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
5. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS (WHERE NOT COVERED)
6. Ø DENOTES DETENTION AREA (RESTRICTION ON THE USE OF LAND)
7. C.S. CARSPACE
8. I INSIDE FACE OF KEED (CARSPACES)
9. I CENTRE OF COLUMN AND FACE OF COLUMN
10. CARSPACES ARE 5.5 x 2.5 AND CONTAIN AREA OF 14m<sup>2</sup> UNLESS SHOWN OTHERWISE.
11. THE TERRACE WHERE NOT COVERED IS RESTRICTED IN STRATUM TO 3.6 ABOVE THE UPPER SURFACE OF ITS FLOOR.
12. LOT 51 IS LIMITED IN STRATUM TO 4 BELOW THE UPPER SURFACE OF THE MAIN GROUND FLOOR OF LOT 1 AND IS UNLIMITED IN HEIGHT.

Reduction Ratio 1: 300

Lengths are in metres

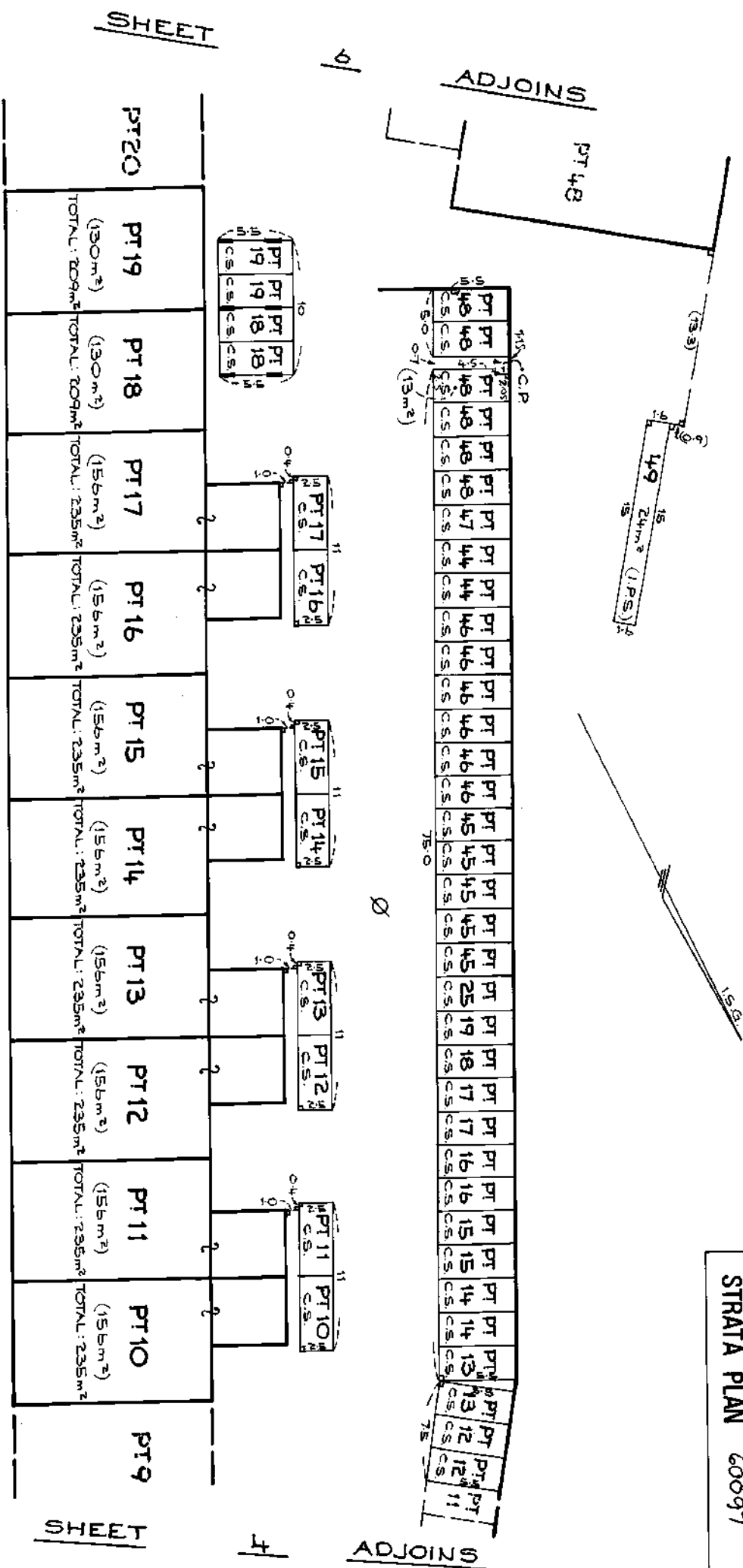


Surveyor Registered under Surveyors Act 1929  
SURVEYOR'S REFERENCE: 55081

General Manager/Authorised Person



STRATA PLAN 60097



GROUND FLOOR  
LOTS 10 TO 19 & 49  
CARSPACES LOTS 12 TO 19, 25, & 45 TO 48

- NOTES
1. I.P.S. DENOTES ILLUMINATED POLE SIGNAGE
  2. h RIGHT ANGLE
  3. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
  4. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS (WHERE NOT COVERED)
  5. LOT 49 IS LIMITED IN STRATUM TO 5 BELOW THE UPPER SURFACE OF THE MAIN GROUND FLOOR OF LOT 48 AND IS UNLIMITED IN HEIGHT
  6.  $\emptyset$  DENOTES DETENTION AREA (RESTRICTION ON THE USE OF LAND)
  7. CARSPACES ARE 5.5 x 2.5 AND CONTAIN AN AREA OF 14m² UNLESS SHOWN OTHERWISE.
  8. C.S. DENOTES CAR SPACE
  9. — DENOTES INSIDE FACE OF KEEP (CAR SPACES)
  10. — DENOTES CENTRE OF COLUMN AND FACE OF COLUMN.
  11. C.P. " COMMON PROPERTY.

Reduction Ratio 1: 300

Lengths are in metres



Surveyor Registered under Surveyors Act 1929

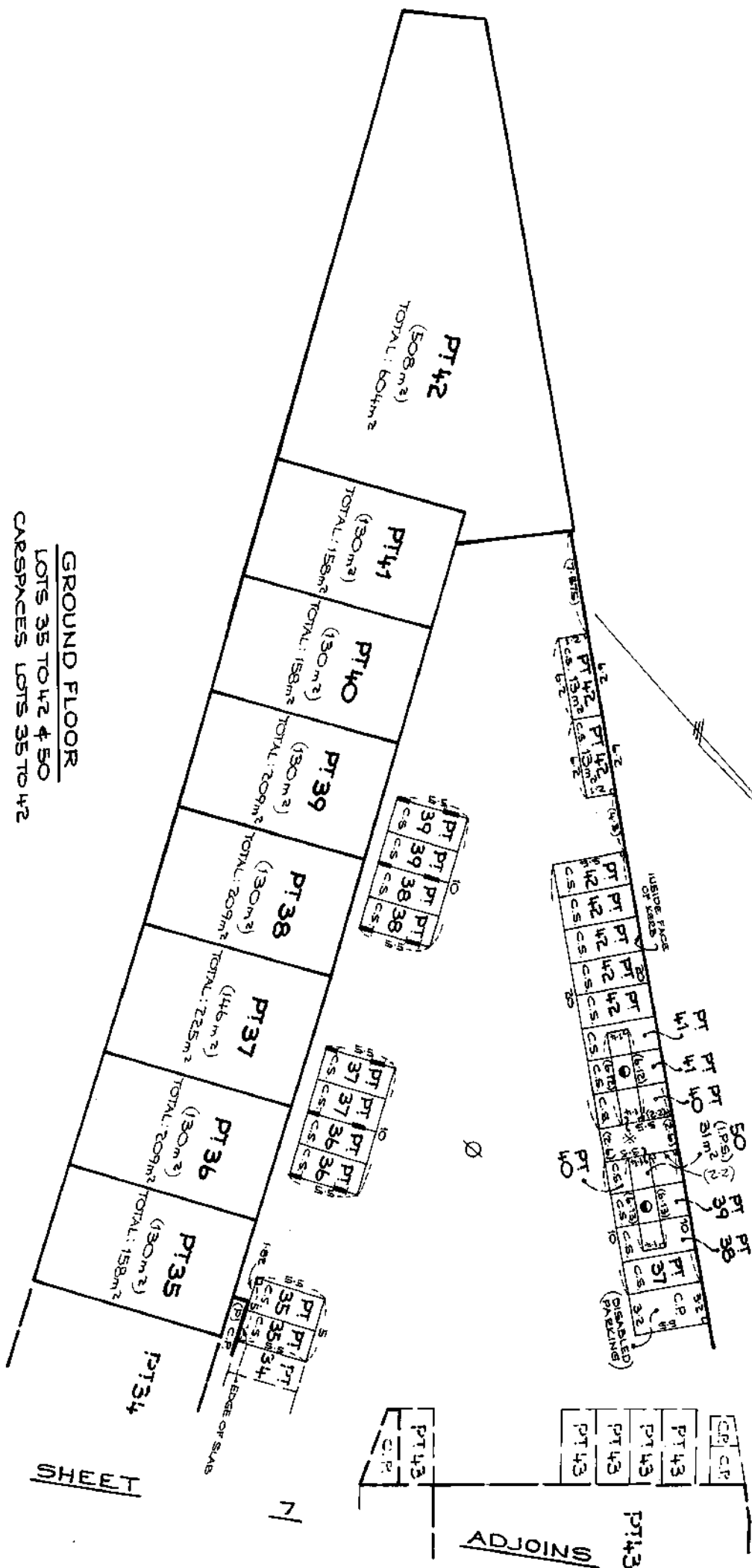
C.C. Robertson

General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081







NOTES

1. C.P. DENOTES COMMON PROPERTY
2. H. RIGHT ANGLE
3. I.P.S. ILLUMINATED POLE SIGNAGE
4. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.
5. CARSPACES ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THEIR RESPECTIVE FLOORS (UNLESS COVERED)
6. C.S. DENOTES CARSPACE
7. Ø. DEUTATION AREA (RESTRICTION ON THE USE OF LAND)
8. P. PLASTER BED (CONCRETE SLAB EDGE)
9. P. PLASTER BED (CONCRETE SLAB EDGE)
10. Ø. THESE PARTS OF LOT 50 ARE LIMITED IN STRATUM TO 2.5 ABOVE THE UPPER SURFACE OF THE RESPECTIVE FLOORS AND ARE UNLIMITED IN HEIGHT.
11. X. THAT THIS PART OF LOT 50 IS LIMITED IN STRATUM TO 3 BELOW THE UPPER SURFACE OF THE FLOOR LEVEL OF CARSPACE PT LOT 40 ADJOINING TO THE NORTHWEST AND IS UNLIMITED IN HEIGHT.
12. CARSPACES ARE 3.5 X 2.5 AND CONTAIN AN AREA OF 14.25 M<sup>2</sup> UNLESS SHOWN OTHERWISE.

GROUND FLOOR  
LOTS 35 TO 42 & 50  
CARSPACES LOTS 35 TO 42

Reduction Ratio 1: 300

Lengths are in metres

Surveyor Registered under Surveyors Act 1929

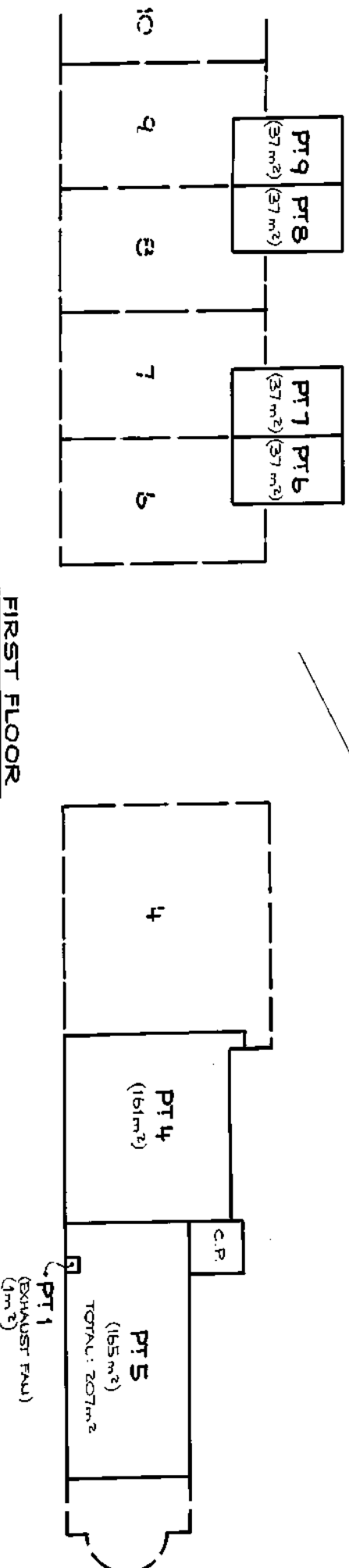
General Manager/Authorised Person

SURVEYOR'S REFERENCE: 55081



STRATA PLAN 60097

\*OFFICE USE ONLY



## FIRST FLOOR

- NOTES
1. C.P. DENOTES COMMON PROPERTY.
  2. AREAS ARE APPROXIMATE ONLY AND NOT SUITABLE FOR LEASING PURPOSES.

Reduction Ratio 1: 300

Lengths are in metres

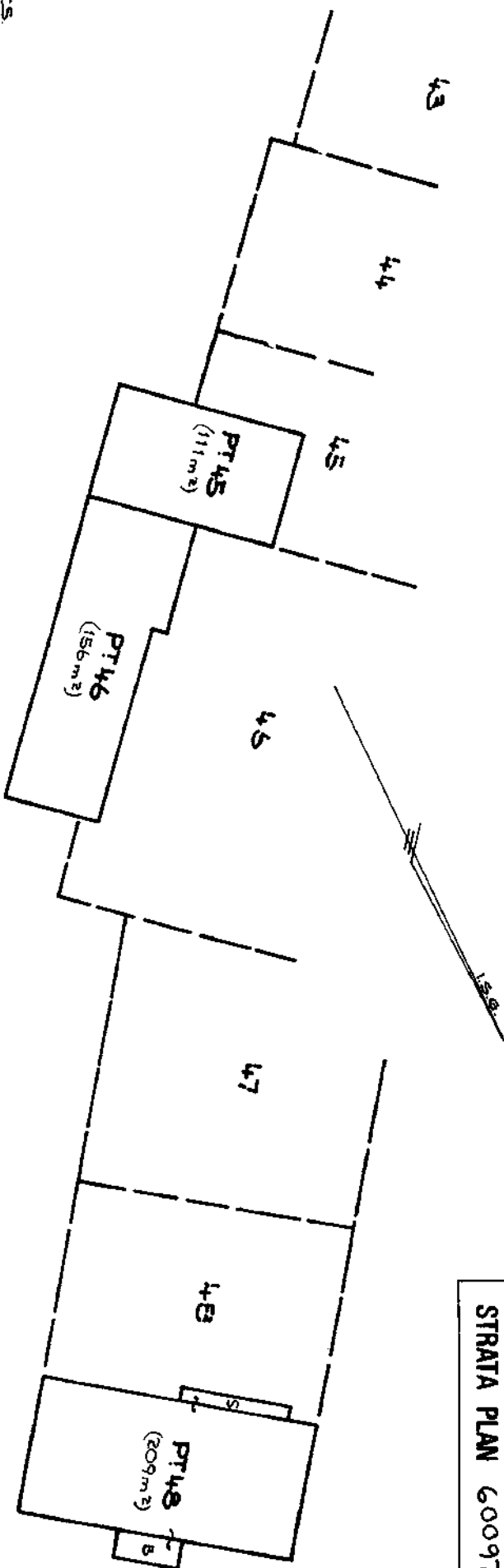


Surveyor Registered under Surveyors Act 1929

General Manager/Authorised Person

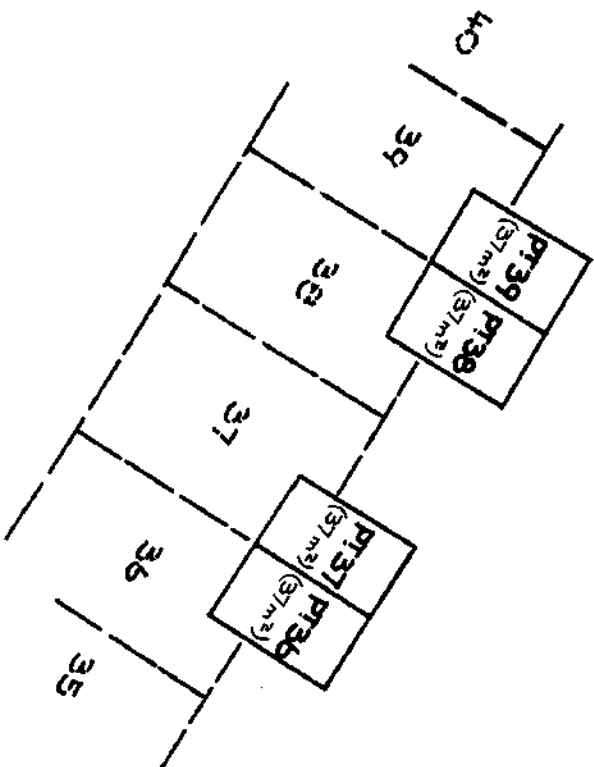
SURVEYOR'S REFERENCE: 55081

STRATA PLAN 60097



- NOTES
1. AREAS ARE APPROXIMATE AND INCLUDE THE BALCONY AND ARE NOT SUITABLE FOR LEASING PURPOSES.
  2. D. DENOTES BALCONY
  3. S. DENOTES STAIRS (INTERNAL)
  4. BALCONY WHERE NOT COVERED IS LIMITED IN STRATUM TO 7.7 ABOVE THE UPPER SURFACE OF ITS FLOOR.

FIRST FLOOR



FIRST FLOOR

Reduction Ratio 1: 300

Lengths are in metres



Surveyor Registered under Surveyors Act 1928  
C.C. Ridd  
General Manager/Authorised Person  
SURVEYOR'S REFERENCE: 55081



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 1:30:45 PM

---

Submitted on Wed, 28/08/2024 - 13:30

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2135

**Please provide your view on the project**

I am just providing comments

### **Submission**

I'm a property owner in the Strathfield triangle and would like to provide my submission  
1, Inconsistent height (a) creating undesirable living (b) not maximising the benefits of a prime location. One side of Leicester ave (17 metres height limit), Manson Rd and Swan ave (21 height limit) have very height limit.

The other side of these streets have extremely high height limits of 40m to 114 metres  
This creates mountain and valley effect with low height buildings being buried in a huge mountain of jungle concrete—creating overshadowing, invasion of privacy (overlooking) and reduction in the property value. Who would want to live in a detached house or apartment that is surrounded by buildings which are at least 3 times its height? One can't even see the sky. This area should be zoned as mixed use as it is just next to the train station. Please provide consistent height or defer rezoning until consistency can be achieved. 2. Amalgamation site—please remove Amalgamation of sites. Developers will not

make money from the heritage sites. 3.Rezoning will increase council rate

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 2:09:22 PM

---

Submitted on Wed, 28/08/2024 - 14:09

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am making a personal submission

## Name

**First name**

■

**Last name**

■

**I would like my name and personal contact details to remain confidential**

Yes

## Info

**Email**

■

**Suburb/Town & Postcode**

2141

**Please provide your view on the project**

I support it

### Submission

Submission in Support of the Homebush TOD Rezoning Proposal

I support the Homebush TOD Rezoning Proposal because it offers a much-needed opportunity for people like me who have been struggling with rental instability for years. Over the last decade, I've had to move five times due to rental price increases, which has made it difficult to establish a stable and secure living situation.

I've been saving for a small apartment for a long time, and the TOD proposal gives me hope that I'll finally be able to afford a home near a train station, providing me with both stability and convenience. While I don't live locally, this proposal would allow people like me to achieve the security of homeownership and no longer have to worry about being forced out of a rental property. I fully support this rezoning proposal and the positive impact it can have on people in similar situations.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 3:59:31 PM  
**Attachments:** [to-nsw-government-planning.docx](#)

---

Submitted on Wed, 28/08/2024 - 15:58

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Ya Nan

### **Last name**

Shen

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Strathfield NSW 2135

### **Please provide your view on the project**

I object to it

### **Submission file**

[to-nsw-government-planning.docx](#) (13.11 KB)

### **Submission**

My name is Ya Nan (Jeff) Shen. I am the property owner of [REDACTED] Mosely Street Strathfield NSW 2135, and this is my residential home. My property is back to back to the houses on the eastern side of the Swan Avenue. Swan Avenue eastern side will be rezoned from R3 to R4, while Mosely Street under Burwood council is a R2 conservation area. If this rezoning proposal is approved, the developer may build a high raise building right next to my back yard.

I understand government need the rezoning to resole the housing issues in Sydney. The planning proposal will benefit less for the development to the eastern side of Swan

Avenue, meanwhile it will cause many problems to the properties on the western side of Mosely Street. I will find myself very uncomfortable to live in a house next to a high raise building. My property value may go down for this reason.

Can I suggest the rezoning will be applied to the western side of the Swan Avenue only? Or consider both the eastern side Swan Avenue and western side of the Mosely Street are rezoned together.

For any further discussion, please contact me via email: [REDACTED] or phone [REDACTED].

Regards,

Jeff Shen

**I agree to the above statement**

Yes



To NSW Government Planning

Re: Homebush TOD rezoning proposal

Dear Officer,

My name is Ya Nan (Jeff) Shen. I am the property owner of [REDACTED] Mosely Street Strathfield NSW 2135, and this is my residential home. My property is back to back to the houses on the eastern side of the Swan Avenue. Swan Avenue eastern side will be rezoned from R3 to R4, while Mosely Street under Burwood council is a R2 conservation area. If this rezoning proposal is approved, the developer may build a high raise building right next to my back yard.

I understand government need the rezoning to resolve the housing issues in Sydney. The planning proposal will benefit less for the development to the eastern side of Swan Avenue, meanwhile it will cause many problems to the properties on the western side of Mosely Street. I will find myself very uncomfortable to live in a house next to a high raise building. My property value may go down for this reason.

Can I suggest the rezoning will be applied to the western side of the Swan Avenue only? Or consider both the eastern side Swan Avenue and western side of the Mosely Street are rezoned together.

For any further discussion, please contact me via email [REDACTED] or phone [REDACTED]

Regards,

Jeff Shen

**From:** [REDACTED]  
**To:** [DPE Homebush TOD Mailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Re: Agency Distribution Homebush TOD Precinct exhibition is live  
**Date:** Wednesday, 28 August 2024 4:00:42 PM  
**Attachments:** [image001.png](#)  
[Outlook-rt1vkjfi.png](#)  
[Homebush Letter to DPHI.pdf](#)

---

Hi DPIE Team,

Please find Ausgrid response attached re Homebush TOD.

Regards,

**Jonothan Clarke**

Customer Manager - Government & Transport | Customer Connections | Customer Assets & Digital



[REDACTED]  
Level 12, 24-28 Campbell Street, Sydney NSW 2000  
[REDACTED]

For Official use only

---

**From:** [REDACTED]  
**Sent:** Wednesday, 17 July 2024 10:19 AM

**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Agency Distribution Homebush TOD Precinct exhibition is live

Hi All

Thank you for your agencies involvement in planning for the Homebush Precinct as part of the Transport Oriented Development (TOD) program. The Department of Planning, Housing and Infrastructure appreciate your agency taking the time to collaborate and provide feedback on the draft rezoning proposal.

The Department advises that:

- the draft Homebush TOD Precinct rezoning proposal has been finalised and is now on public exhibition, with feedback sought until Friday 16 August.
- the proposal, including all supporting documentation, can be viewed on the Department's website at <https://www.planning.nsw.gov.au/plans-for-your-area/priority-growth-areas-and-precincts/parramatta-road/homebush>
- The proposal will contribute to the NSW Government's commitment to building 377,000 new homes by 2029. The rezoning of the Homebush Precinct will enable the delivery of

well-located homes near existing transport infrastructure.

- As part of the exhibition, the Department will be consulting with industry and landowners about the delivery of housing and infrastructure. It is important to move the project forward and deliver homes near existing transport infrastructure to meet demand and deliver on the National Housing Accord to address the housing crisis.

The Department invites your agency to view the exhibition material looks forward to receiving your agencies feedback on the proposal and will continue to work with your agency throughout the next steps and finalisation of the plan in 2024. The Department would be appreciated if your agency can forward any feedback on the draft Homebush TOD Precinct rezoning proposal directly to the Department's Homebush TOD Project Team [homebushtod@dpie.nsw.gov.au](mailto:homebushtod@dpie.nsw.gov.au)

Regards

**Homebush TOD Team**

Planning Land Use Strategy and Housing | Department of Planning, Housing and Infrastructure

**E** [homebushtod@dpie.nsw.gov.au](mailto:homebushtod@dpie.nsw.gov.au)

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

[dphi.nsw.gov.au](http://dphi.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

This e-mail may contain confidential or privileged information. If you have received it in error, please notify the sender immediately via return e-mail and then delete the original e-mail. If you are the intended recipient, please note the change of sender email address to [@ausgrid.com.au](mailto:@ausgrid.com.au). Ausgrid has collected your business contact details for dealing with you in your business capacity. More information about how we handle your personal information, including your right of access is contained at <http://www.ausgrid.com.au/>

23 August 2024



Homebush TOD Team  
Department of Planning, Housing and Infrastructure  
4 Parramatta Square,  
12 Darcy Street,  
Parramatta NSW 2150

24-28 Campbell St  
Sydney NSW 2000  
All mail to  
GPO Box 4009  
Sydney NSW 2001  
T +61 2 13 13 65  
ausgrid.com.au

To whom this may concern,

**RE: Homebush TOD Precinct rezoning**

We thank you for the opportunity to provide a response to the draft Homebush rezoning proposal as part of the Transport Oriented Development (TOD) program. Ausgrid is committed to providing safe, reliable and affordable electricity supply to the customers in our area, in terms of both providing a connection, but also by providing a means for exchanging energy between customers. Timely and effective inclusion of electricity supply infrastructure in the proposed development is a key element of meeting government, developer and customer needs over the life of the precinct.

Ausgrid has been liaising with the various NSW Government bodies involved in this project throughout the planning process and has appreciated the cooperation in identifying the electricity infrastructure requirements necessary to successfully provide for the Homebush TOD Precinct.

We have worked closely with numerous stakeholders including Greater Sydney Commission, Transport for NSW, Sydney metro and Planning NSW. To date we have been able to effectively meet the growing demand for electricity in cooperation with those bodies.

In terms of rezoning proposal for Homebush, in addition to the general reticulation of power within the precinct, Ausgrid confirms there is limited capacity available at the zones surrounding the developments. Substantial network augmentation is required at existing Burwood, Concord, Flemington and Olympic Park zones to meet the ongoing growing supply demands of the proposed Homebush rezoning and surrounding developments.

We look forward to continuing our effective engagement with all stakeholders to ensure we manage all the risks and to realise all the opportunities to deliver a successful project.

Connecting communities,  
empowering lives

Please do not hesitate to contact me for clarification or further information if required.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'M.S. Appleton'.

Mark Appleton  
Head of Asset Management & Planning (acting)  
Ausgrid

Two lines of blacked-out text, likely redacting contact details such as a phone number and email address.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 6:45:29 PM

---

Submitted on Wed, 28/08/2024 - 18:45

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2140

**Please provide your view on the project**

I support it

**Submission**

I support it

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 7:11:31 PM

---

Submitted on Wed, 28/08/2024 - 19:11

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

**Submission**

I support the Homebush TOD around North Strathfield station areas

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 7:13:09 PM

---

Submitted on Wed, 28/08/2024 - 19:12

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2137

**Please provide your view on the project**

I support it

**Submission**

I support the Homebush TOD project

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 8:37:00 PM  
**Attachments:** [submission-to-nsw-government.docx](#)

---

Submitted on Wed, 28/08/2024 - 20:35

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Homebush 2140

**Please provide your view on the project**

I object to it

**Submission file**

[submission-to-nsw-government.docx](#) (15.73 KB)

**Submission**

Please see attached letter.

**I agree to the above statement**

Yes

[REDACTED]  
Homebush, NSW, 2153  
[REDACTED]  
[REDACTED]

28 August 2024

Dear Department of Planning, Housing and Infrastructure,

Subject: Objection to Homebush TOD Rezoning Proposal and Request for Considerations

We are writing to express our concerns and opposition to the proposed rezoning in our area.

**\*\*Objection to Green Space Rezoning\*\***

We strongly disagree with the proposed rezoning of the green space. Historically, our houses have never been subjected to flooding. In contrast, it was the house across the road at number 43 that experienced flooding, yet this property is now being considered for apartment development. This decision seems to overlook the actual flooding history.

**\*\*Impact on Community and Environment\*\***

The potential impact on our community and environment is another significant concern. The current infrastructure, particularly public transport and road networks, is already under strain. Trains heading to the city during peak hours are overcrowded, and traffic at currently congested points such as DFO roundabout can take 10-15 minutes to navigate. Events at Sydney Olympic Park, further exacerbate the congestion issues. Introducing high-density

apartment buildings will only exacerbate these issues, leading to further strain on our community's quality of life.

Additionally, the rezoning to high density could result in a significant increase in population density, which our local infrastructure is not equipped to handle. The increase in noise, pollution, and strain on local services such as schools, healthcare, and recreational facilities could detrimentally affect the liveability of our area. The character of our neighbourhood, currently defined by a quiet family-friendly atmosphere and native flora and fauna, would be at risk of being fundamentally altered by such developments.

High-density housing also raises concerns about the long-term environmental impact. Increased population density can lead to greater waste production, higher energy consumption, and a reduction in biodiversity. The potential loss of mature trees and natural habitats is particularly troubling, as these are crucial for maintaining air quality and providing natural beauty that enhances our community's well-being.

**\*\*Request for Consideration if Proposal Proceeds\*\***

Should the NSW Government/Councils decide to proceed with the rezoning and development, we request that all properties within a designated block, such as Block A Ismay Avenue (which includes the green space), be sold together as a unit to a developer. This approach will ensure that development is cohesive and considers the broader impact on the community.

Thank you for considering our concerns. We trust that the NSW Government and Councils will take these points into account when making a decision that will significantly impact our neighbourhood.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 9:14:34 PM

---

Submitted on Wed, 28/08/2024 - 21:14

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Bong

**Last name**

Yeun

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield 2137

**Please provide your view on the project**

I support it

**Submission**

We need more FSR and more high raises Apartments near North Strathfield Metro station.

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 10:06:24 PM

---

Submitted on Wed, 28/08/2024 - 22:06

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield

**Please provide your view on the project**

I support it

**Submission**

[REDACTED]

28/8/24

NSW Department of Planning and Environment

GPO Box 39

Sydney NSW 2001

Subject: Support for Homebush Transport-Oriented Development (TOD) Proposal with Recommendations for Enhanced Amalgamation and Sustainable Urban Growth

Dear Sir/Madam,

I am writing to express my strong support for the proposed Transport-Oriented Development (TOD) plan for the Homebush area, which includes the precinct where my home [REDACTED] Conway Ave, North Strathfield is located. The TOD proposal is a visionary plan that aligns with global urban development trends and addresses the pressing housing and environmental challenges facing Sydney.

**Support for the TOD Proposal:**

The TOD proposal presents a comprehensive and forward-thinking strategy that integrates housing development with transport infrastructure. By focusing on increasing housing density around transport hubs, such as North Strathfield, the plan will create vibrant, walkable communities with easy access to jobs, services, and public transport. This approach not only addresses Sydney's housing crisis but also contributes to reducing urban sprawl and promoting more sustainable living.

**Recommendations for Enhanced Amalgamation and Sustainable Growth:**

**Increasing the Floor Space Ratio (FSR):**

To encourage successful property amalgamation and ensure the TOD objectives are fully realized, I recommend increasing the Floor Space Ratio (FSR) for developments in the rezoned areas. A higher FSR would allow developers to build more units on a given plot of land, which could provide the necessary financial incentive for property owners, particularly those in duplexes, to participate in the redevelopment process. This approach would help achieve consistent and higher-density development, aligning with the goals of the TOD proposal.

**Building for the Future – Learning from Global Cities:**

The TOD proposal is a step towards transforming Sydney into a more sustainable and livable city, much like other major global cities such as New York, London, Tokyo, and Paris. In these cities, the density around metro stations is significantly higher, and the need for private car ownership is greatly reduced. Residents rely on well-connected public transport networks, which not only reduces traffic congestion but also contributes to a lower carbon footprint.

By encouraging higher density development around transport hubs, the TOD proposal supports the shift towards a more sustainable urban environment. This approach aligns with global best practices and is crucial for addressing the environmental challenges posed by climate change. Fewer cars on the road lead to reduced greenhouse gas emissions, improved air quality, and healthier living conditions for all residents.

**Conclusion:**

In conclusion, I wholeheartedly support the TOD proposal for the Homebush area. It represents a visionary approach to urban development that addresses both housing and environmental challenges. However, I urge the Department to consider increasing the Floor Space Ratio (FSR) to facilitate successful property amalgamations and to continue building for a future that embraces higher density living and sustainable urban growth.

Thank you for considering my submission. I am excited about the positive changes that the TOD proposal will bring to our community and look forward to its successful implementation.

Yours sincerely,

[REDACTED]

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 10:11:06 PM

---

Submitted on Wed, 28/08/2024 - 22:10

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

[REDACTED]

**Last name**

[REDACTED]

**I would like my name and personal contact details to remain confidential**

Yes

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

North Strathfield

**Please provide your view on the project**

I support it

**Submission**

[REDACTED]

28/8/24

NSW Department of Planning and Environment

GPO Box 39

Sydney NSW 2001

Subject: Support for Homebush Transport-Oriented Development (TOD) Proposal with Recommendations for Enhanced Amalgamation and Sustainable Urban Growth

Dear Sir/Madam,

I am writing to express my strong support for the proposed Transport-Oriented Development (TOD) plan for the Homebush area, which includes the precinct where my home [REDACTED] Conway Ave North Strathfield is located. The TOD proposal is a visionary plan that aligns with global urban development trends and addresses the pressing housing and environmental challenges facing Sydney.

**Support for the TOD Proposal:**

The TOD proposal presents a comprehensive and forward-thinking strategy that integrates housing development with transport infrastructure. By focusing on increasing housing density around transport hubs, such as North Strathfield, the plan will create vibrant, walkable communities with easy access to jobs, services, and public transport. This approach not only addresses Sydney's housing crisis but also contributes to reducing urban sprawl and promoting more sustainable living.

**Recommendations for Enhanced Amalgamation and Sustainable Growth:**

**Increasing the Floor Space Ratio (FSR):**

To encourage successful property amalgamation and ensure the TOD objectives are fully realized, I recommend increasing the Floor Space Ratio (FSR) for developments in the rezoned areas. A higher FSR would allow developers to build more units on a given plot of land, which could provide the necessary financial incentive for property owners, particularly those in duplexes, to participate in the redevelopment process. This approach would help achieve consistent and higher-density development, aligning with the goals of the TOD proposal.

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The TOD proposal is a step towards transforming Sydney into a more sustainable and livable city, much like other major global cities such as New York, London, Tokyo, and Paris. In these cities, the density around metro stations is significantly higher, and the need for private car ownership is greatly reduced. Residents rely on well-connected public transport networks, which not only reduces traffic congestion but also contributes to a lower carbon footprint.

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**Conclusion:**

In conclusion, I wholeheartedly support the TOD proposal for the Homebush area. It represents a visionary approach to urban development that addresses both housing and environmental challenges. However, I urge the Department to consider increasing the Floor Space Ratio (FSR) to facilitate successful property amalgamations and to continue building for a future that embraces higher density living and sustainable urban growth.

Thank you for considering my submission. I am excited about the positive changes that the TOD proposal will bring to our community and look forward to its successful implementation.

Yours sincerely,

[REDACTED]

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 11:46:46 PM

---

Submitted on Wed, 28/08/2024 - 23:46

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Seul

### **Last name**

Kim

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Five Dock

### **Please provide your view on the project**

I support it

### **Submission**

I have been a resident of Canada Bay Council for the past 7 years and I fully support and welcome the current proposal that can help to resolve the current housing crisis. I actually believe and support even more increased density around both train stations in Homebush precinct but more especially on North Strathfield station as there is already a train station and a Metro station is being built.

### **I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Wednesday, 28 August 2024 11:49:36 PM

---

Submitted on Wed, 28/08/2024 - 23:49

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

**First name**

██████

**Last name**

██████

**I would like my name and personal contact details to remain confidential**

Yes

## **Info**

**Email**

████████████████████

**Suburb/Town & Postcode**

2138

**Please provide your view on the project**

I support it

### **Submission**

I support the government's plan to increase density around train stations due to current housing crisis. I support the current proposal for homebush TOD area and even more increased density to help to resolve the housing crisis as soon as possible. I support even more increased density around North Strathfield station as metro line is being built.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 10:09:11 AM

---

Submitted on Thu, 29/08/2024 - 10:08

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Yu-Na

**Last name**

Kim

**I would like my name and personal contact details to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2046

**Please provide your view on the project**

I support it

**Submission**

I have been a resident of Canada Bay Council for the last 7 years and I fully support and welcome the current proposal that can help to resolve the current housing crisis. I actually believe and support even more increased density around both train stations in Homebush precinct but more especially on North Strathfield station as there is already a train station and a Metro station is being built.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 10:22:36 AM

---

Submitted on Thu, 29/08/2024 - 10:22

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Insook

**Last name**

Seong

**I would like my name and personal contact details to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2046

**Please provide your view on the project**

I support it

**Submission**

I have been a resident of Canada Bay Council and I fully support and welcome the current proposal that can help to resolve the current housing crisis. I actually believe and support even more increased density around both train stations in Homebush precinct but more especially on North Strathfield station as there is already a train station and a Metro station is being built.

**I agree to the above statement**

Yes

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 10:53:16 AM

---

Submitted on Thu, 29/08/2024 - 10:53

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Theva

### **Last name**

Surendra

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

North Strathfield

### **Please provide your view on the project**

I support it

### **Submission**

Hi There,

I am an owner of [REDACTED] & [REDACTED] George Street North Strathfield and overall I am supportive of the program of works and understand the requirement of developing more homes near Transport.

However I am concerned on the economic feasibility of the program and its success it being able to be implemented. I have spoken to a few developers and agents that specialize in selling these parcels and they have raised concerns over the affordability housing cap limits and development contributions.

From a personal perspective I was planning on building our family home on [REDACTED] George Street, in the event we aren't able to sell it for an attractive offer we will continue with our

build process and therefore would make it even harder to get people to sell.

I would suggest the State have feasibility discussions with developers and consider what value is required to move existing owners out of their neighborhood.

Thanks

Theva

**I agree to the above statement**

Yes



**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 10:59:14 AM  
**Attachments:** [homebush-tod-submission-sydney-alliance-20240823.docx](#)

---

Submitted on Thu, 29/08/2024 - 10:48

Submitted by: Anonymous

Submitted values are:

### Submission Type

I am submitting on behalf of my organisation

## Name

### First name

Cat

### Last name

Coghlan

### I would like my name and personal contact details to remain confidential

No

## Info

### Email

[REDACTED]

### Suburb/Town & Postcode

Sydney

### Please provide your view on the project

I object to it

### Submission file

[homebush-tod-submission-sydney-alliance-20240823.docx](#) (102.94 KB)

### Submission

29 August 2024

RE: Submission to Homebush TOD consultation

The Sydney Alliance, representing 40 civil society organisations within Sydney would like to oppose the Transport Oriented Development proposal for Macquarie Park in it's current form.

Sydney Alliance calls on the Minns Government to deliver 15-20% affordable housing in perpetuity, in the planned transport-oriented developments.

The Alliance is demanding no less than 1 in 6 homes committed to affordable housing if the government is to adequately address the housing supply crisis.

The Homebush proposal to require only 5-10% of new developments to be zoned for affordable rentals falls short of our hopes of 15% by 800 homes. These are 800 homes that could house the low to medium income families who serve Homebush by cleaning buildings, stocking supermarkets, performing pathology, working in the local aged care homes and the like.

The Alliance is also calling on the Minns Government to listen to the voices of low to middle income earners in Sydney who are looking to them to lead planning reform for the most vulnerable in the community, and to resist the lobbying pressure of those seeking to dilute the positive outcomes from these developments.

Sydney Alliance partners including Shelter NSW, the Tenants' Union of NSW, Faith Housing Alliance, United Workers Union, and Catholic Archdiocese of Sydney Justice and Peace office released a joint statement on 29 November 2023.

Sydney Alliance has been calling on both sides of politics in NSW for over 10 years to mandate a minimum percentage of housing developments be set aside for affordable rental housing, in perpetuity.

- 15%-20% on up zoned land on private land for lower-income-affordable rental housing.
- Minimum of 30% for those on government owned land.

Sydney Alliance says that the issue of homes being affordable in perpetuity is critical; the community will not accept affordable homes returned to developers to be sold at market rates after 10-15 years.

Regards

Cat Coghlan

Co-Lead Organiser Sydney Alliance

---

CEO of Shelter NSW, John Engeler, says it is vital that the next wave of Sydney's housing growth around stations is accompanied by commitments to boost social and affordable housing and improve access to jobs and amenities.

"The people of Greater Sydney are demanding a better deal out of density. We can break the cycle of density proposals leading to a community backlash with a solid government plan to ensure the general community gets a better deal out of increased density.

The right to develop bigger and taller buildings around publicly-funded transport nodes needs to be matched by the requirement to deliver something significant back to the community. That something needs to be truly affordable housing for low-middle income people, great public spaces and buildings that people can be proud of", Mr Engeler said.

---

United Workers Union Director, Mel Gatfield, said the Government needs to prioritise affordable housing and take action before the housing crisis worsened.

"UWU members across the board are reporting housing stress either through mounting interest rate increases, or through an inability to secure an affordable and suitable rental in the current market," Ms Gatfield said.

"Heaps of workers in the industries we represent are being paid the bare minimums set out in the Award which amounts to around \$900-a-week, meanwhile the average rental in Sydney is \$711-per-week.

"If we don't change the policy settings and change them quickly, we're essentially telling workers in cleaning, in hospo, in early childhood education, in factories and distribution centres that having a house is a luxury, not a right."

---

Justice and Peace Promoter for the Catholic Archdiocese of Sydney, Fr Peter Smith, said "Never in living memory has Sydney housing been more unaffordable than it is now."

"A roof over one's head is out of reach for a growing number of individuals and families, for whom the market has no answer. The Government needs to intervene to require a substantial number of these new dwellings to be set aside for social and affordable housing."

---

CEO of the Tenants' Union of NSW, Leo Patterson Ross, said, "Sydney is in an enduring rental crisis with many people struggling to keep themselves and their family in safe, healthy and affordable housing. Transformational projects like new transport hubs offer big opportunities for more homes and a more diverse range and price of housing but we know these developments won't deliver unless government asks for it. This is just one part of the housing puzzle, we especially need to ensure public and community housing is also being built, but we can't miss any opportunity to ensure our city works for everyone."

---

CEO of Faith Housing Alliance, Rose Thomson, said the community expects a Labor government to prioritise social and affordable housing for low-income households including key workers.

"Housing and homelessness services are telling us that families are cracking under the strain of extremely unaffordable rents. Increased densities around transport hubs must deliver social and affordable rental housing at scale for people who are otherwise locked out of well-located housing."

**I agree to the above statement**

Yes

29 August 2024

RE: Submission to Homebush TOD consultation

The Sydney Alliance, representing 40 civil society organisations within Sydney would like to oppose the Transport Oriented Development proposal for Macquarie Park in its current form.

Sydney Alliance calls on the Minns Government to deliver 15-20% affordable housing in perpetuity, in the planned transport-oriented developments.

The Alliance is demanding no less than 1 in 6 homes committed to affordable housing if the government is to adequately address the housing supply crisis.

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Regards

Cat Coghlan  
Co-Lead Organiser Sydney Alliance

---

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*"The people of Greater Sydney are demanding a better deal out of density. We can break the cycle of density proposals leading to a community backlash with a solid government plan to ensure the general community gets a better deal out of increased density."*

*The right to develop bigger and taller buildings around publicly-funded transport nodes needs to be matched by the requirement to deliver something significant back to the community. That something needs to be truly affordable housing for low-middle income people, great public spaces and buildings that people can be proud of", Mr Engeler said.*

---

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*"Heaps of workers in the industries we represent are being paid the bare minimums set out in the Award which amounts to around \$900-a-week, meanwhile the average rental in Sydney is \$711-per-week.*

*"If we don't change the policy settings and change them quickly, we're essentially telling workers in cleaning, in hospo, in early childhood education, in factories and distribution centres that having a house is a luxury, not a right."*

---

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*"A roof over one's head is out of reach for a growing number of individuals and families, for whom the market has no answer. The Government needs to intervene to require a substantial number of these new dwellings to be set aside for social and affordable housing."*

---

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---

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*"Housing and homelessness services are telling us that families are cracking under the strain of extremely unaffordable rents. Increased densities around transport hubs must deliver social and affordable rental housing at scale for people who are otherwise locked out of well-located housing."*

**From:** [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [DPE Homebush TOD Mailbox](#)  
**Subject:** Webform submission from: Homebush TOD rezoning proposal  
**Date:** Thursday, 29 August 2024 11:06:52 AM

---

Submitted on Thu, 29/08/2024 - 11:06

Submitted by: Anonymous

Submitted values are:

### **Submission Type**

I am making a personal submission

## **Name**

### **First name**

Akalya & Theva

### **Last name**

Surendra

### **I would like my name and personal contact details to remain confidential**

No

## **Info**

### **Email**

[REDACTED]

### **Suburb/Town & Postcode**

Concord West

### **Please provide your view on the project**

I support it

### **Submission**

Hi There,

We are supportive of the program of works and understand the reasons behind it. We are currently joint land owners of [REDACTED] King Street Concord West with my elderly in laws.

The properties within George/King & Victoria street in Concord West have been omitted from the plans on the basis they fall under Canada Bay Councils remit.

However id request these houses be reviewed, If the north Strathfield rezoning goes ahead, these would be the last 30-40homes left in that peninsula and would be surrounded by apartments, particularly as 1 King street, being a bilberga development has the endorsement by council (8-10 storey apartments).



In my view the planning is not consistent and there is a valuation risk for these homes being wedged between apartments.

The department should give consideration to these homes and consider them now under the proposal. If we miss this opportunity I have limited faith in Canada Bay to execute the rezoning - as they have previously rejected King/George & Victoria street proposals in the past.

Thank  
Theva

**I agree to the above statement**  
Yes