

**Introduction:**

Firstly, the Department is to be commended for its the comprehensive consultation process. We have no objection to the Precinct proposals generally, but have specific concerns about the future viability of development within the proposed B6 Mixed use zone. We also wish to update/advise the Department concerning our recent submissions to Cumberland Council and the recent resolution of the Local Planning Panel in response to our submissions which recommended that Council officers examine the provision of “shop top housing” within all B6 Zoned land as part of an early “second stream” future review of the Cumberland Council consolidating LEP

This submission primarily deals with issues relevant to the future viability of development within the B6 Zone generally, including proposed B6 Zoned land situated opposite the Precinct along Parramatta road and within the Carter Street Precinct boundaries north of Parramatta Road.

**Discussion:**

*MJ. Developments* owns a large car yard property in Lidcombe along Parramatta Road parallel and opposite to the Carter Street Precinct. Submissions made to Cumberland Council as part of their Local Environmental Plan (LEP) consultation process took issue with the limited range of land uses permitted in the Enterprise Zone (residential land uses are currently prohibited in the B6 Zone as part of mixed-use development). This (exclusion of residential land uses) clearly inhibits viable redevelopment options within the zone. It was further observed as part of our submissions to Cumberland Council that the former Holroyd Local Government Area (LGA) LEP currently permits shop top housing within the B6 Zone. However, the new Cumberland Consolidating LEP proposes to *prohibit* all residential uses within the B6 zone.

Previous submissions by **SIMPLAN** and *MJ. Developments* to Cumberland Council proposed that the (undesirable) creation of “existing use rights” for approved residential developments in former Holroyd LGA could be avoided by undertaking an early review of land use controls in all B6 Zoned land following gazettal of the new Cumberland consolidating LEP. It was submitted that this would also “incentivise” development within the B6 zone. In response to written and verbal submissions to Cumberland Council’s Local Planning Panel, the Panel resolved on 20 February 2020 as follows:

***The Panel recommends that shop top housing be considered for inclusion in the B6 zones as part of the Council’s future strategic corridor planning. The Panel is of the view that the non-residential component of the housing should be at least 30% of the gross floor area of the building.***

**Note:** *The above recommendation was accepted by Council. Council officers have indicated that this will be actioned as part of an early “second stream” review of the new consolidated Cumberland LEP post gazettal.*

With reference to the proposed B6 Zoning shown on the exhibited Carter Street Precinct Plan, we assume the new B6 Zone is intended to have similar land use controls to the existing B6 Enterprise Zone opposite along Parramatta Road (i.e. residential land uses will continue to be prohibited). Apart from improved “Metro” public transport accessibility in the future, the proposed B6 zone within the Precinct would appear to have no overriding planning or development feasibility attributes in comparison with similar “B6” zoned areas located along the opposite side of Parramatta Road which are currently well serviced by public transport. In our view, the land use and employment generating objectives of the new Precinct B6 zone will not be achieved as intended because timely, viable redevelopment is unlikely to occur if a restrictive B6 land use zone that prohibits residential uses continues into the future.

A proportion of “Shop Top” housing as part of future mixed-use development is essential in our view to “incentivise” redevelopment of **all** B6 zones otherwise sites within the new B6 Precinct Enterprise Zone will likely remain vacant for some time or alternatively may attract land uses with a poorer urban design presentation. In contrast, a flexible Enterprise Zone land use initiative will significantly boost redevelopment by making proposals financially feasible and at the same time achieve much needed and timely improvements to the appearance of Parramatta Road. Encouraging and prioritising good urban design outcomes along the highway was a key objective of the Parramatta Road Urban Transformation Strategy.

Apart from designated centres, no significant redevelopment has occurred recently along most of Parramatta Road, including the many car yards located opposite the Precinct at Lidcombe. The age of many of the existing buildings along most of Parramatta Road, many 50 -100 years old, is testament to the current disincentive to redevelop properties. This has created a poor urban environment which will only persist unless a more enlightened planning approach is implemented to expands the range of permitted land uses in the B6 Enterprise Zones not only within the Carter Street Precinct but opposite along Paramatta Road.

A modified B6 Enterprise land Use allowing a proportion of residential uses within future employment generating mixed use proposals is essential for feasible redevelopment to occur.

Appropriate development standards in the Cumberland LEP can mandate a maximum residential component if there are ongoing concerns about employment generation. Future B6 permitted land use zonings post amendment of the Cumberland LEP should also be consistent along both sides of Parramatta Road. The Carter Street Precinct land use and development controls should therefore be

reviewed concurrently with the “second stream study” to be implemented by Cumberland Council (see above) .

A future mixed land use option for the B6 Zone incorporating a proportion of residential use will also better relate to the remaining mix of land uses proposed in the revised Master Plan for the Carter Street Precinct. Industries have changed significantly in the way they operate in recent times with the result that residential uses can happily co-exist with many business and light industrial uses. In addition, supervision of the public domain by apartment dwellers will enhance overall safety within the Precinct.

Finally, it is submitted that permitting a modest amount of residential use in the B6 zone would not prejudice Cumberland Council’s or the Department’s desired employment or residential strategies, as the distribution and amount of residential uses permitted on sites can be strictly controlled by inserting appropriate development standards in any amending LEP (see Panel recommendation above).

Thank you once again for the further opportunity to make a submission to the Department. Please note that copies of our previous submissions were provided to the Greater Sydney Commission, Cumberland Council and to the Department.

Yours faithfully



Ron Sim

**SIMPLAN**  
**Consulting**  
**Town Planners**

*(on behalf of MJ Developments).*

**cc. Cumberland Council**

**Attachment:** Previous submission to Cumberland Council

## Cumberland Council – Submission by MJ Developments – Local Strategic Planning Statement

### Attn. Director Strategic Town Planning (Monica Cologna)

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Dear Madam,

We would firstly like to commend Cumberland Council for preparing the currently exhibited Draft Local Strategic Planning Statement (LSPS). Our understanding is that in addition to outlining Council's broad vision for the LGA (see below) and providing a strategic direction + co-ordinated approach to effectively manage growth and development in the Cumberland area, the LSPS aligns with, and responds appropriately to the provisions of the Central City District Plan, including specific proposals contained in the Parramatta Road Urban transformation Study (PRUTS) + associated "Outcomes" Report (attached). The PRUTS and the PRUTS "Outcomes" feedback report are referenced in the above District Plan. We assume Council's Draft LSPS and the PRUT recommendations/outcomes are subject to amendment – if supported by informed community feedback.

It is noted that Council's Draft LSPS sets a 10-year strategic vision for economic, social and environmental land uses in Cumberland LGA and that following adoption, Council intends to prepare a new Local Environmental Plan (LEP) which will align with the aims and objectives of the LSPS and replace "legacy" LEP's currently applying to the former Holroyd and Lidcombe LGAs.

We previously made extensive submissions to Cumberland Council, the Department of Planning Industry and Environment and to the Greater Sydney Commission relating to our properties in Lidcombe - designated as a "Frame Area" within the PRUTS (Auburn Precinct). A copy of our submissions + details of our properties is **attached**. The fundamental and consistent message in our submissions is that there are "untapped" opportunities to allow appropriately scaled residential development along Parramatta Road in conjunction with employment uses.

*We strongly believe this objective should be reflected in the finally adopted Cumberland Local Strategic Planning Statement.*

This proposed land use strategy may achieve Council's dwelling targets earlier, whilst potentially limiting the need to implement (often contentious) proposals rezoning existing low-density residential zones to permit higher density development. Creating a more flexible (B6) Enterprise Zone along the highway which promotes residential uses, as well as employment activities, will provide a much-needed financial incentive to owners for redevelopment, whilst simultaneously retaining and enhancing employment opportunities along the road corridor that may not otherwise be realised.

Council officers will be aware that the M4 motorway has substantially reduced traffic volumes along Parramatta Road. Traffic volumes are expected to reduce further as additional motorway links are completed, such as the recent opening of the motorway tunnel between Concord and Haberfield/Ashfield and the proposed future motorway extension to St. Peters and to the Northern Beaches. These road improvements and reductions in through traffic have already significantly enhanced the environmental qualities of Parramatta Road to a degree where it is self-evident that residential development as a component of mixed-use development along the highway is entirely appropriate from a town planning and environmental perspective.

The **PRUTS** Outcomes report (attached) also indicates that most residents are generally supportive of additional residential development along Parramatta Road (see Attachment) The State Government has also committed to providing substantial funding for improvements to the public domain along Parramatta Road. We understand that future "Fast Transit" (bus) links along the highway are also planned.

Properties fronting Parramatta Road should in our view be considered for rezoning to permit “shop top housing” along a “revitalised” Parramatta Road serviced by fast, frequent metro bus services. This can best be achieved by allowing “shop-top housing” as a permitted land use within a (modified) B6 Enterprise Zone. An appropriate zoning amendment in the future Cumberland LEP can readily maintain the employment objectives for the road corridor by specifying a minimum FSR for “Enterprise” type land uses as a mandatory component of a larger combined FSR for mixed use development which permits “shop-top” housing. Appropriate Urban Design Guidelines can ensure that taller buildings fronting Parramatta Road appropriately reduce in scale where abutting low-density residential zones – this is possible given the substantial depth of many properties along the road (such as existing car yards).

Additional reasons for considering an amendment to a future B6 Zone along Parramatta Road to include “shop-top” housing as a permitted land use are as follows:

- Existing businesses along the road are suffering financially. Many car yards are becoming progressively less viable due to internet private sales and a reduction in passing traffic. Traditional servicing of vehicles will also decline as electric vehicles become mainstream. Without the introduction of a financial incentive realised by permitting residential uses within a redevelopment “mix”, most businesses along Parramatta Road will have no (financial) incentive to proceed with redevelopment.
- The environment of the subject Lidcombe “frame” properties, other properties in the near vicinity, and within the Auburn Precinct generally (as defined in the PRUTS document) is undeniably poor, and will no doubt erode further if more flexible land use outcomes are not available within a reasonable time frame to owners to incentivise redevelopment.
- In our view, it would arguably be “negligent” from a town planning perspective to ignore the obvious attributes of Parramatta Road for mixed use development. These attributes include the excellent availability of public transport, north facing lots, large property sizes with opportunities for amalgamation and the proximity of excellent shopping centres at Lidcombe and Auburn. In urban design terms, any new development along the Lidcombe part of Parramatta Road and within the Auburn Precinct generally would form a logical extension of the higher density residential typologies permitted within the nearby Homebush and Carter Street Precincts. Access to the proposed Metro rail link to Parramatta and the City from Parramatta Road would also be available. Importantly, an enlightened “mixed-use approach” to future zoning along the highway can promote early urban renewal and the progressive removal of what are essentially low employment generating, unsightly car yards and car repair stations.

Given the above, we seek a brief meeting with Council’s strategic town planning director (Ms. Monica Cologna to express our views). An exchange of opinions will assist us in gaining a clearer understanding of the above issues from a “Cumberland Council perspective” and likely time scale for Council to finalise the exhibited Draft LSPS + prepare a new LEP. We would also seek Council’s feedback at such a meeting concerning the specific land use zoning issues raised in this letter and in our previous submissions (attached). These submissions strongly recommend changes to land use zoning and associated development standards within the PRUTS” Lidcombe Frame Area”, and within the Auburn Precinct generally.

It would be appreciated if you could contact **Mr. Ron Sim** to arrange a suitable time, date and venue for a meeting.

Mr. Sim's contact details are below. We anticipate any meeting would not extend for no more than 0.75 hrs. duration.

Thank you for your ongoing help and feedback concerning this matter.

Kind Regards



Ron Sim (on behalf of M.J. Developments)

28 August 2019

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**Separate Attachments:**

1. Our previous submissions to Cumberland Council (these documents were cc'd to the Greater Sydney Commission and to Urban Growth)
2. "Marked up" extracts from Council's Draft LSPS (which we believe support the thrust of the recommendations in this submission)
3. The PRUTS "Outcomes Report" showing positive feedback for creating additional residential development opportunities along Parramatta Road (responses highlighted).

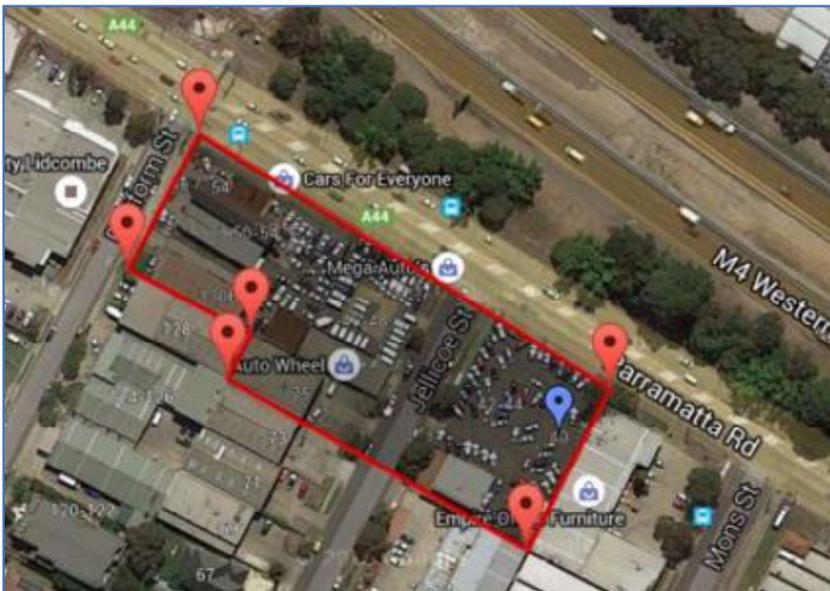
**ADDITIONAL UPDATED SUBMISSION TO CUMBERLAND COUNCIL, GREATER SYDNEY COMMISSION & DEPARTMENT OF PLANNING & ENVIRONMENT ON BEHALF OF M.J. DEVELOPMENTS - WEST CENTRAL DISTRICT PLAN - AUBURN PRECINCT.**

**BACKGROUND:**

**Attached** are self-explanatory copies of a previous submission relevant to the above Precinct recently forwarded to Urban Growth (UG). Copies were provided to the Department of Planning and Environment (Design Branch) and to Council prior to commencement of the District Plan making process. The purpose of this submission was to assist the plan-making process. It includes specific recommendations which aim to revitalise the “Auburn Precinct” along Parramatta Road both economically and environmentally. Most of the issues addressed in the previous submission remain relevant but should also be considered in the context of this updated document.

This submission also considers the “Draft Parramatta Road Urban Design Guidelines” for the Precinct which accompanied Urban Growth’s Draft Parramatta Road Strategy (endorsed by the Greater Sydney Commission for exhibition with the Draft District Plan).

**Auburn Precinct. (West Central District)**



Subject properties within Precinct 40-44, 46-48, 50-54 Parramatta Road Lidcombe, 76 Jellicoe Street (at rear of 40-44 Parramatta Rd), 75 Jellicoe Street & 130 Platform Street, Lidcombe).

**COMMENTS:**

Urban Growth’s recommendations for the Auburn Precinct are generally positive. The recommendation in the UG “Outcomes Report” to examine the potential to introduce new residential and mixed uses along Parramatta Road and throughout the Auburn Precinct, appropriately supported by the further provision of public transport, open space and social infrastructure is strongly supported. An appropriate zoning/land use mix incorporating residential uses is an important issue for this “Frame Area” to create economically viable renewal opportunities along Parramatta Road. Commercial, light industrial and retail uses necessary to “activate” Parramatta Road must be economic in the context of the overall viability of a proposed development. This means that a residential component in any development is a pre-requisite to “incentivise” redevelopment. In addition, a proportion of

affordable housing may also be a requirement of any future mixed use development if residential uses are permitted.

An increase in the scale of development permitted within the “Frame Area” supported by a more flexible land use mix is also very important to achieve a new, improved urban character for this part of Parramatta Road. A lower built form adjacent to the Highway stepping up to a higher scale and then transitioning to a lower scale built form adjacent to dwellings further south is possible (see sketch below produced for the Auburn “Frame Area” as delineated by Urban Growth).

This submission notes public feedback received by Urban Growth to the effect that building heights in the Platform/Jellicoe Street “Frame Area” need to be lower adjacent to low rise existing dwellings. This objective is generally agreed with. However, it is noted that existing light industrial properties north of Jellicoe Street in some cases extend for a considerable distance south of Parramatta Road. This allows opportunities for taller development adjacent to Parramatta Road for some sites gradually scaling down in height towards existing single dwellings located further south.



As indicated above, land use controls along Parramatta Road within the Enterprise Zone “Frame Area” should permit residential apartments as part of mixed use developments to provide a much-needed economic incentive for redevelopment. The desired percentages of residential and commercial floor space within a development to ensure ground level uses “activate” street frontages can be specified by including a clause specifying this in a planning instrument (Hills Shire Council have included this type of control in a recent Gateway approved Planning Proposal). An alternative is to apply a mixed-use zone to the “Frame Area” which would permit a range of employment generating uses including residential uses (see comments below re. possible mixed use zone in the Auburn Precinct)

It is noted that Urban Growth recommends the creation of ‘Rapid Transit Bus Zones’ along Parramatta Road including fast transit zones adjacent to the Auburn Precinct “Frame Area”. Road widening to facilitate this objective is eminently achievable due to a median strip existing between Parramatta Road and the M4 to the north at this location. This median area extends for several kilometres further west from Lidcombe towards Sydney.

The Parramatta Light rail project (stage 1) has recently been announced. This new rail line will be a 5-minute walk approximately from the subject Granville properties. The State Government has also recently committed to improving the heavy rail line between Lidcombe and Granville. There are sub-regional shopping facilities on Parramatta Road a few minutes

walking distance from the Auburn properties available to service new residents' shopping requirements.

## **CONCLUSIONS:**

There are compelling reasons (a view shared by the former Auburn Council) to permit a much broader range of land uses in this "Frame Area", including development for retail/shop top housing and potentially 'stand-alone' residential uses. These uses could be permitted within an Enterprise or Mixed Use Zone. Current activities (primarily existing car yards extending along the highway) are increasingly unviable due to "internet sales disruption".

There are also presently limited development incentives currently available to property owners to redevelop sites whilst relatively inflexible land use provisions and restrictive, narrowly focussed LEP floor space ratio and building height development standard incentives focussing on a limited range of permitted land use categories remain in place. This is evidenced by the very low rate of redevelopment which has occurred in the locality.

It is therefore recommended that development standards for the subject properties and the "Frame Area" generally be reviewed by Cumberland Council to realise considerable untapped potential for taller built form outcomes along the Parramatta Road Enterprise Zone given the northerly aspect, larger lot sizes, potential for property amalgamation, proximity to taller buildings at Olympic Park and the excellent transport/sub-regional shopping facilities which are currently and/or will soon be available. Achieving an appropriate scale adjoining Paramatta Road and addressing the sensitive "interface area" between taller buildings set back from the highway and the lower density, low rise residential development further south can be adequately controlled within and adjoining the "Frame Area" using development standards to achieve an appropriate transition in building scale (refer to Urban Design guidelines for the Precinct proposed by Urban Growth). This is possible given the substantial area/depth of many lots and untapped potential for property amalgamations. The average age of most buildings in the "Frame Area" would easily be between 50 and 70 years old. This is further evidence that there is currently no incentive to upgrade or redevelop buildings because of the inflexible planning controls currently in force.

We submit that more flexible zoning and land use controls coupled with a review of development standards have the potential to "kick-start" transformation of this somewhat visually "blighted" locality with its increasingly uneconomic business activities to a more contemporary, improved urban form supported by sustainable, economically viable mixed use activities and residential uses. This will "activate" the "Auburn Precinct Frame Area" within a realistic time frame, an objective broadly supported by former Auburn Council in its recent response to Urban Growth's "Outcomes" Report.

It would be appreciated if this document, together with our previous submission can be carefully considered by Cumberland Council to inform future housing strategies in addition to land use controls and development standards specified in any future Planning Instruments applying to the subject properties and to surrounding areas. A copy of this submission has been forwarded to the Greater Sydney Commission and to the Department of Planning and Environment.

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10 March 2017

**SUBMISSION TO URBAN GROWTH NSW ON BEHALF OF  
MJ DEVELOPMENTS P/L.**

**40-44, 46-48, 50-54 Parramatta Road Lidcombe,  
76 Jellicoe Street (at rear of 40-44 Parramatta Rd),  
75 Jellicoe Street & 130 Platform Street, Lidcombe.**



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**15 June 2016**

Urban Growth  
Western Sydney Portfolio  
PO Box 237  
Parramatta NSW 2124

Email: [enquiry@urbangrowth.nsw.gov.au](mailto:enquiry@urbangrowth.nsw.gov.au)

6 June 2016

**Attn. Mr. Mathew White - UGNSW Project Leader**

Dear Sir,

Re. Auburn Precinct – Response to “Outcomes Report” - Draft Parramatta Road Urban Transformation Strategy - Land Use and Development Standards in proposed District Plans. Submission on behalf of owner of 40-44, 46-48, 50-54 Parramatta Road Lidcombe, 76 Jellicoe Street (at rear of 40-44 Parramatta Rd), 75 Jellicoe Street and 130 Platform Street Lidcombe.

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### Background

I refer to Urban Growth’s recent “Outcomes Report” which provides a summary of community and Council feedback to the recently exhibited Precinct Plans for Parramatta Road and in particular feedback relating to the “Auburn Precinct”.

Whilst it is acknowledged that the formal period for submissions in relation to the exhibited Draft Parramatta Road Transformation strategy has concluded, this additional submission is considered necessary to:

- Respond to Urban Growth’s “Outcomes Report”.
- Provide background data including details of current planning controls in relation to particular properties.
- Ensure that currently permitted maximum building height and floor space ratio development standards for certain properties are not diminished as appears to be proposed in the *Draft Auburn Precinct Plan* publicly exhibited by Urban Growth.
- Ensure that currently applicable Auburn LEP “bonus’ provisions for development within the applicable B6 Enterprise Zone are retained and if possible, expanded to include additional land uses in the event rezoning of land is proposed in future “District Plans” to be exhibited during 2017.
- Request Urban Growth to consider amendments to land use controls and related development standards currently applying to the subject properties and to the B6 Enterprise zone generally in order to achieve viable redevelopment potential. The objective is to encourage new development for retail, mixed residential and commercial uses and/or “stand-alone” apartment development as permitted land uses in this locality for inclusion in a future Draft District/Local Environmental Plan and supporting Development Control Plan.

**Note:** The land use changes requested in this submission are also supported by former Auburn Council in its recent submissions to Urban Growth (see “Outcomes” Report).



**Note:** The current Burwood Council LEP permits “shop top” housing as part of mixed use development within its B6 Enterprise Zone. Mixed use redevelopment incorporating an expanded range of permitted land uses including residential uses can act as a catalyst to significantly improve the current poor urban design quality of this part of Parramatta Road.

## **Currently Applicable Planning Controls.**

Permitted and prohibited land uses within the B6 zone are as follows (highlights added):

### **Permitted with Consent:**

*Building identification signs; Bulky goods premises; Business identification signs; Business premises; Community facilities; Food and drink premises; Garden centres; Hardware and building supplies; Hotel or motel accommodation; Kiosks; Landscaping material supplies; Light industries; Markets; Neighbourhood shops; Passenger transport facilities; Plant nurseries; Roads; Timber yards; Vehicle sales or hire premises; Warehouse or distribution centres;*

### **Prohibited:**

Agriculture; Air transport facilities; Animal boarding or training establishments; Boat building and repair facilities; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Correctional centres; Crematoria; Eco-tourist facilities; Electricity generating works; Environmental facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Heavy industrial storage establishments; Highway service centres; Home occupations (sex services); Industrial training facilities; Industries; Marinas; Mooring pens; Moorings; Open cut mining; Port facilities; Recreation facilities (major); Research stations; **Residential accommodation;** Restricted premises; **Retail premises;** Rural industries; Sewerage systems; Sex services premises; Signage; Tourist and visitor accommodation; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities

## **Relevant Development Standards:**

The subject properties are within the “Parramatta Road Precinct” as referenced in Clauses 4.3 and 4.4 of the Auburn LEP written instrument. The LEP specifies the following development standards for the subject properties:

Maximum permitted Building Height, including “bonus” height provisions for certain specified land uses such as hotels, motels and office uses (Clause 4.3 (2A) (a) of LEP) = 27metres

Maximum permitted Floor Space Ratio (FSR) = 1:1. Bonus Floor Space Ratio for Parramatta Road Precinct (Clause 4.4 (2B) (a) and (b) of LEP) as follows:

- 1.5:1 for bulky goods premises, entertainment facilities, function centres and registered clubs, and
- 3:1 for office premises and hotel or motel accommodation.

## **Our Submission:**

Urban Growth proposes the following in the Draft Precinct Plan for Auburn relevant to the subject properties:

- Retention of B6 Enterprise Zone with a focus on employment outcomes
- Maximum permitted building height to be 4 storeys (17 metres)
- No additional residential or retail land uses permitted within the B6 Enterprise Zone along Parramatta Road.

We commend instead the following alternative planning methodology:

### ***The spectrum of permitted Land Uses needs to be broadened:***

The B6 Enterprise Zone should be retained but mixed use development comprising a range of employment generating uses such as retail, offices, light industry and in addition, shop top housing and/or “stand-alone” apartments should also be permitted with consent. Current car yard uses in the area are no longer viable with the advent of

internet car sales. A wider “mix” of permitted land uses including residential and retail development is necessary to encourage viable redevelopment that will also facilitate a new, more attractive streetscape along this part of Parramatta Road.



**3. Current car yard uses predominate along Parramatta Road as shown above. These uses are becoming increasingly uneconomic with the advent of internet car sales. In urban design terms these “open” car display lots and adjacent low rise structures are of poor visual quality. What is required is newer development employing a range of different materials with attractive, modulated facade treatments to achieve high quality urban design outcomes. These developments can be of a scale that complements the substantial width of Parramatta Road including a mix of uses designed to “activate” the area and increase pedestrian activity along the highway.**

***The future environment of the area will be increasingly conducive to a wider range of uses including residential uses which should be encouraged:***

The M4 East is currently being widened and will potentially further reduce traffic volumes along this part of Parramatta Road. This means mixed use development incorporating a residential component or “stand alone” apartment buildings can take advantage of an increasingly “benign” living environment.

Properties along Parramatta Road face north (see photograph below) which means that high levels of solar access and amenity can be achieved. Shop top housing/apartment buildings can incorporate attractive entry foyers at ground level and individual apartment designs can be “cross through” to allow residents access to quieter areas within dwellings.

Living areas of apartments facing north towards Parramatta Road can incorporate adjustable louvres at balconies to control solar access and to minimise any vehicle noise.



***4. This image illustrates the north facing aspect of the subject properties facing Parramatta Road. Future mixed use/residential development can take advantage of excellent solar access and the proposed rapid transit links along Parramatta Road in addition to future light rail opportunities. Existing heavy rail lines are also in close proximity.***

***Currently permitted land uses act as a substantial constraint to economically viable development:***

If a more flexible land use mix incorporating shop top housing, apartments and retail uses is not implemented, currently permitted business uses, and incentivised “hotels and motels” will not by themselves result in the “higher order” redevelopment mix necessary to revitalise this part of Parramatta Road. There is (self-evidently) a limited market available for non-residential development and similarly, a market “ceiling” clearly exists for the quantum of “hotel and motel” uses currently promoted via development standard variations in the Auburn LEP.

***There should be no reduction in currently achievable development potential and current development standards for the Parramatta Road area should be reviewed***

Current LEP height controls including FSR bonuses available for “hotel and motel development” must not be subject to “downsizing” in any new Plan for this locality. Exhibited proposed Precinct Plan controls require redrafting to reflect this.

We would strongly argue that the maximum permitted “bonus” building height (27 metres) and related FSR “bonus” of 3:1 currently permitted for properties fronting Parramatta Road be reviewed as part of the future Precinct/District Plan process. Such a review could examine the possibility of allowing additional building height and an increased FSR for developments along the highway given the northern aspect and substantial separation of many sites from areas of lower density residential development further south. The substantial scale of recent development constructed at Olympic Park also demonstrates that high standards of urban design are achievable.

Larger lot sizes in this area are also conducive to revised development standards for this part of Parramatta Road. Redevelopment of these lots including sites with potential for property amalgamation will allow greater design flexibility and provision of generous building setbacks. We contend that an “incentivised” regime of development standards should be applied to all future mixed use developments and to “stand-alone” residential developments so as to encourage economically viable land uses and improved urban

design outcomes. Any concerns relating to the built form transition between (taller) mixed use buildings and lower rise residential dwellings to the south can be addressed via specific LEP building height and floor space ratio development standards supported by appropriate Development Control Plan provisions drafted in consultation with the community.



**5. The image above shows the subject properties fronting Parramatta Road (top of photograph) which have secondary frontages to Platform Street and Jellicoe Street (arrowed). This allows secondary vehicular access to maintain uninterrupted traffic flows along Parramatta Road. Dual property frontages can also facilitate improved site planning and urban design opportunities. The subject sites also have potential for amalgamation with adjoining properties further south to further enhance development potential.**

***Affordable housing opportunities are available:***

There are significant opportunities to provide elements of affordable housing as part of future mixed use or “shop-top” housing or apartment development. Achieving this objective can be “incentivised” by linking building height/floor space ratio incentives to contributions for affordable housing via an LEP Clause to achieve a “win-win” scenario (a methodology successfully tested in the former Ashfield Council’s LEP 2013).

***Excellent public transport, and recreational facilities are in close proximity:***

The subject sites and surrounding area have excellent public transport connections. Rapid transit bus links are proposed by Urban Growth along Parramatta Road and heavy rail facilities are situated nearby to the south at Lidcombe and to the north at Olympic Park. Light rail is also proposed north of Parramatta Road to link the fast growing regional centres of Parramatta and Burwood as shown in Urban Growth’s “Draft Integrated Land Use and Transport Concept”. Heavy and light rail stations are easily accessible from the subject sites and surrounding locality. Regional outdoor recreation facilities are also accessible a short distance away to the north at Sydney Olympic Park (see Diagram below).



**6. Urban Growth - Draft Integrated Land use and Transport Concept (Extract)**

- Broken **Blue** line indicates proposed rapid or suburban bus route
- Broken **Red** line shows proposed light rail
- Unbroken **orange** line shows existing heavy rail

**Sub-regional retail and community facilities are available in close proximity**

Lidcombe sub-regional shopping centre is located less than 7 minutes' walk from the subject properties. Over 28,000m<sup>2</sup> of retail and community facilities are currently available at this Centre. Woolworths, ALDI, two "mini-majors" and approximately 60 specialty stores are represented. Approximately 1,000 parking spaces over four levels are provided, allowing easy access to the shopping mall.



**7. Lidcombe Shopping Centre  
- 92 Parramatta Road.**

## Conclusion:

There are compelling reasons (a view shared by former Auburn Council) to permit a much broader range of land uses in this area including development for retail/shop top housing and potentially 'stand-alone' residential uses. Current activities (primarily existing car yards extending along the highway) are increasingly unviable.

There are also presently limited development incentives currently available to property owners to redevelop sites whilst inflexible land use provisions and restrictive, narrowly focussed LEP floor space ratio and building height development standard incentives focussing on specific land use categories remain in place.

It is important however, that, at the very least, building height and floor space ratio "bonus" provisions currently specified in the Auburn LEP for certain types of development within the B6 Enterprise Zone along Parramatta Road are retained for the subject properties. In our view, these 'bonus' development standards should be applied to a wider range of permitted land uses such as retail and/or residential development.

However, we also consider that development standards for the subject properties and surrounding area generally require review to realise what we consider is considerable additional untapped potential for a taller built form outcome along the Parramatta Road Enterprise Zone given the northerly aspect, larger lot sizes, potential for property amalgamation, proximity to taller buildings at Olympic Park and the excellent transport / sub-regional shopping facilities situated nearby.

The sensitive "interface area" between taller buildings and lower density, low rise residential development further south can be adequately controlled using development standards to achieve an appropriate transition in building scale. This is possible given the substantial area of many lots and potential for property amalgamations.

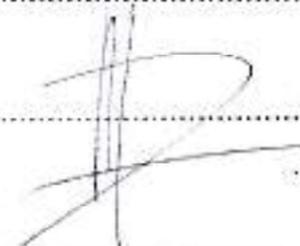
Finally, we respectfully submit that our suggested review of development standards, together with modifications to land use controls have the potential to "kick-start" transformation of this somewhat visually "blighted" area with its increasingly uneconomic business activities to a more contemporary, improved urban form supported by sustainable, economically viable mixed use activities and/or 'stand-alone' residential development. This will "activate" the 'Auburn Precinct' within a realistic time frame, an objective broadly supported by former Auburn Council in its recent response to Urban Growth's "Outcomes" Report.

It would be appreciated if our submission can be carefully considered by Urban Growth, Cumberland Council and the Department of Environment and Planning to inform future planning controls to be specified in any future Draft District/Local Environmental Plan applying to the subject properties and to the surrounding area.

Yours faithfully



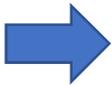
.....Ron Sim - Director - **SIMPLAN P/L** on behalf of:



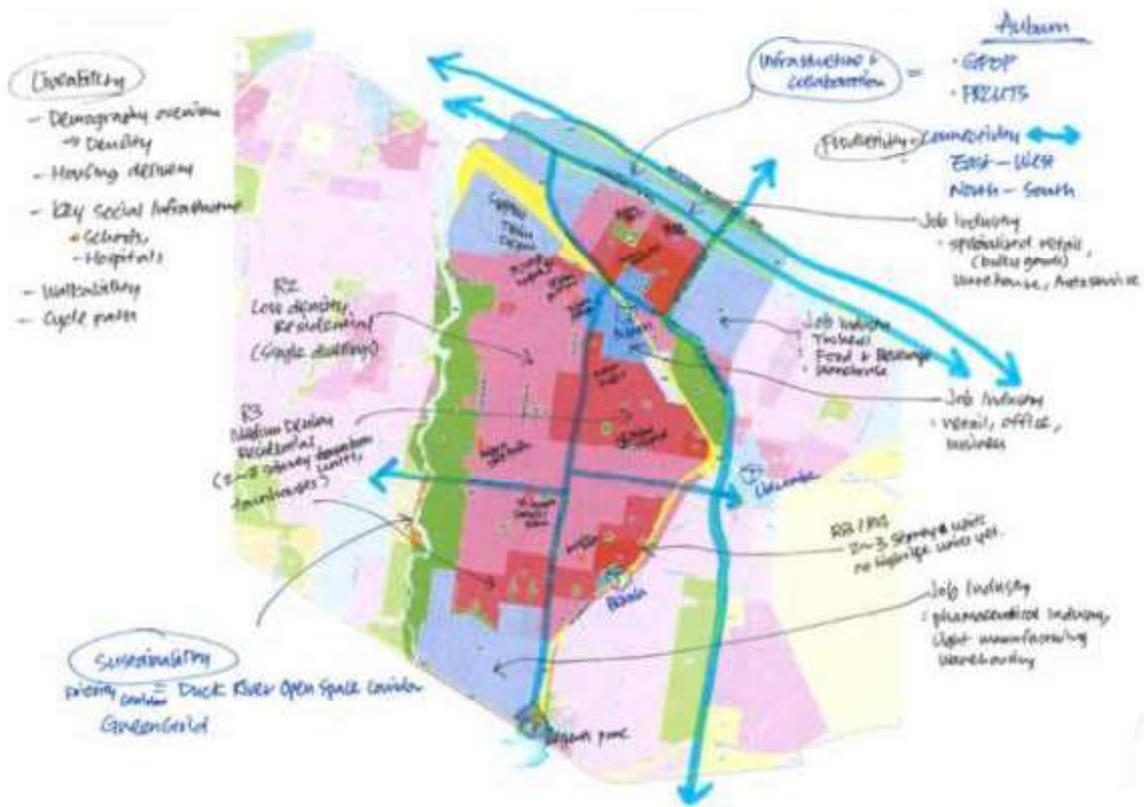
.....Malcolm Jacobsen (owner) - M.J. Developments. 15 June 2016.

# Extracts from Cumberland Council LSPS

## PRINCIPAL LOCAL CENTRE: AUBURN



Auburn is culturally vibrant centre providing street-life activities from popular eat streets and retail centres that deliver distinct night-time economy. North Auburn along Parramatta Road has been identified under the Parramatta Road Corridor Urban Transformation Strategy. This strategy will help to revitalise this corridor to grow with new jobs and housing opportunities.





**OUR STRATEGIC CORRIDORS**

Cumberland has a number of strategic corridors within the area that provide strategic land use opportunities for housing and jobs, supported by government investment. *Cumberland 2030* recognises the importance of our strategic corridors to facilitate sustainable growth in the area. These include the Greater Parramatta to Olympic Park, Parramatta Road corridor, Woodville Road corridor and T-way corridor.

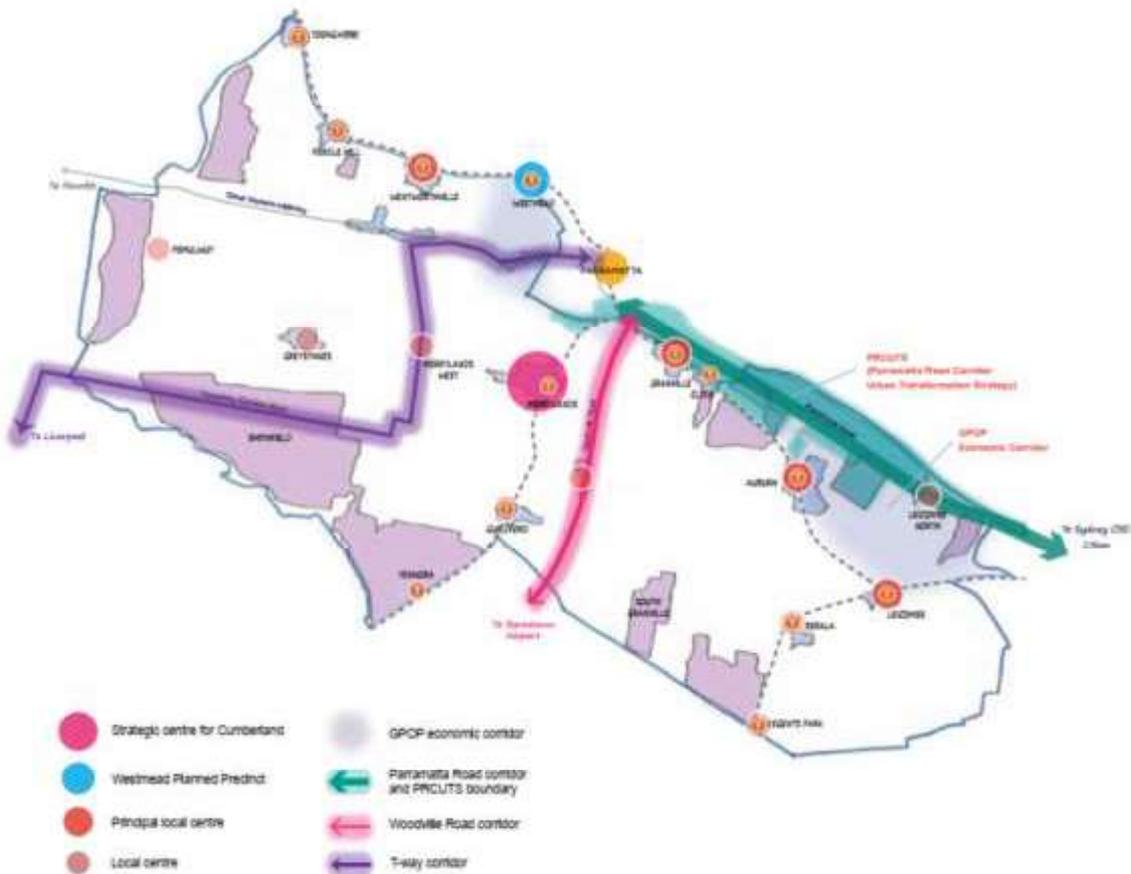


**Greater Parramatta to Olympic Park (GPOP)**

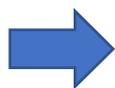
A number of the key visions under the Greater Parramatta to Olympic Peninsula (GPOP) present opportunities for the Cumberland.

**Parramatta CBD and Westmead Health and Education Super Precinct:** The employment opportunities to be developed for the Parramatta CBD will provide local jobs and reduce travel times to work. Sector specialisation in health and education in Westmead will provide job opportunities for residents working in health such as an education super precinct will attract students to Cumberland due to its proximity to Westmead. As part of future housing, worker and student accommodation will need to be considered to ensure the Cumberland community benefits from the prospects presented in the Greater Parramatta area.

**Essential Urban Services, Advanced Technology and Knowledge Sectors:** The benefits of the specialisation sectors and urban services improvements proposed for Auburn will further encourage local employment opportunities and provision of necessary services for the Cumberland community and surrounding areas.



## Extracts from Cumberland Council LSPS



### **Parramatta Road Corridor**

The Parramatta Road Corridor is a priority project under the Central City District Plan. Council is working with the State Government to deliver on its 30-year strategic plan to transform the Parramatta Road corridor. The Parramatta Road Corridor Urban Transformation Strategy will bring a coordinated approach to development inside the Parramatta Road corridor. Council is committed to supporting new jobs and houses in the Auburn precincts and Granville West Frame Area.



# About this chapter

This chapter provides a summary of the feedback on the eight Precinct Plans, including:

- a summary of community feedback on each Precinct Plan
- a summary of local council feedback on each Precinct Plan, and
- our initial response to community and local feedback on each Precinct Plan.

## About the Precincts

The draft Strategy identified eight Precincts to be the focus of growth and renewal within the Corridor because of their access to jobs, transport, infrastructure and services. Each Precinct is being planned to accommodate a different mix of housing, jobs and public spaces in a way that is sensitive to its character and heritage.

For more information on the eight Precinct Plans, please see the draft Strategy at [www.urbangrowth.nsw.gov.au](http://www.urbangrowth.nsw.gov.au)





 Precinct Area     Frame Area

# Feedback on the Auburn Precinct Plan

**Vision:** Taking advantage of its location close to major employment areas such as Parramatta and Sydney Olympic Park, Auburn can be a location for significant employment growth, supported by moderate scale residential development and an improved streetscape.

Source [draft Parramatta Road Urban Transformation Strategy](#), September 2015. All vision statements were developed with councils.

## Engagement snapshot for the Auburn Precinct

The following table outlines the diverse range of feedback channels and consultation activities<sup>^</sup> that were organised for the Auburn Precinct.

ACTIVITIES	 <b>1</b> shopping centre displays	 <b>1</b> community market pop ups	 <b>1</b> train station pop ups	 <b>2</b> community information and feedback sessions
	RESPONSE CHANNELS	 <b>30*</b> responses to the paper and online surveys	 <b>8</b> focus group participants	 <b>10*</b> community submissions

\* The total number of people who submitted a survey is greater than the number above, as not all participants linked their survey to a Precinct.

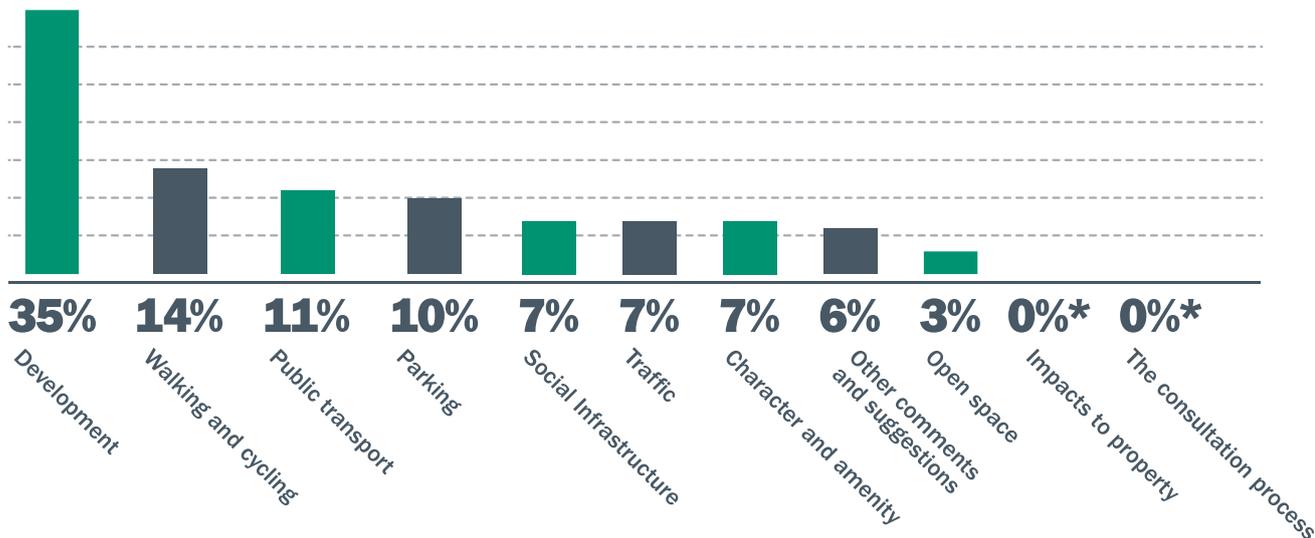
<sup>^</sup> All activities were organised on an LGA basis.



To see more details on the Auburn Precinct Plan please see the draft Parramatta Road Urban Transformation Strategy at [www.urbangrowth.nsw.gov.au](http://www.urbangrowth.nsw.gov.au)

## Feedback on key themes

The graph below presents council and community feedback on the Auburn Precinct Plan against 11 themes. This data is drawn from online/paper surveys and submissions. A breakdown of feedback from councils and the communities is provided in the following sections.



The percentages in the above graph indicate the frequency of comments made by theme.

\* represents less than 0.5% of responses

## What we heard from council

Auburn City Council was the only local council to provide feedback on the Auburn Precinct Plan. A summary of the council's comments and recommendations on the Precinct Plan is provided below.

### Auburn City Council

- Request for the Auburn Precinct to receive a greater share of the \$200 million Urban Amenity Improvement Program funding
- Recommend that economic investment and employment creation be considered as part of the funding allocation model, together with planned increases in residential accommodation and population
- Recommend that connectivity be improved between the Auburn Precinct and adjoining current and planned employment nodes in Silverwater, Carter Street and the Granville Precinct
- Recommend improvements (or new routes, if possible) to walking and cycling routes in Silverwater
- Recommend improvements to walking and cycling facilities at the M4 interchange and the Stubbs Street Bridge as part of the final Urban Amenity Improvement Program
- Suggest road improvements for multiple sections of Parramatta Road, Silverwater Road and St Hilliers Road
- Recommend the Auburn Precinct be considered in the context of Silverwater when finalising plans for the area
- Recommend greater incentives for both housing and economic growth for the Auburn Precinct through adjusting planning controls along Parramatta Road to enable an appropriate mix of uses, including retail/office-commercial/residential floor space

## What we heard from the community

The summary of community feedback on the Auburn Precinct Plan below is presented in order of the themes that received the most comments in the online/paper survey and submissions (as shown in the graph on page 28). This summary reflects the most frequently raised topics under each theme – it is not exhaustive of all comments made on the Auburn Precinct Plan.



### Development

Development was the most frequently discussed theme in the feedback, accounting for 35% of comments made in surveys and submissions.

**Community feedback to the proposed development for the Auburn Precinct was divided evenly between those who supported and opposed the changes.** Other frequent comments included:

- support for increased height, floor space ratio and density along Parramatta Road and near Auburn Station
- request for development to link with local retail key services, the Auburn Town Centre, Auburn Station, employment hubs and social infrastructure
- opposition to increased heights development next to single storey dwellings, such as those on Delhi Street, Bombay Street, Platform Street and Jellicoe Street, and
- concerns from commercial property owners that employment and housing targets will not be met if the current business and enterprise zonings remain.

👉 You've got to provide shops and cafes... you need to attract businesses who want to have offices here, and to have more infrastructure (such as better social and transport infrastructure) to keep them there'.  
– *community feedback*

👉 Enabling for greater residential land use opportunities will take advantage of the projected growth in jobs within the area, by allowing more residents to live closer to employment areas'.  
– *community feedback*



### Walking and cycling

Walking and cycling accounted for 14% of comments made in surveys and submissions.

**The most frequent matter raised was the need to ensure the cycling and walking pathways provided direct connections to key local destinations such as Bunnings, Costco, Reading Cinema, Lidcombe Community Centre, Wentworth Point, and Auburn Station.**

Other comments included:

- support for improvements to pedestrian and cyclist amenity
- requests that cyclist and pedestrian safety is a high priority, and
- requests to connect active transport links to increased heights areas.



### Public transport

Public transport accounted for 11% of comments made in surveys and submissions. **The majority of feedback focused on the need for public transport improvements to support the projected population increase.**

👉 ... increased building heights provide an opportunity to ensure high quality public domain outcomes across the site. Pedestrian amenity and improved bus stop facilities will be key to achieving an integrated transport solution...'  
– *community feedback*

 **Parking**

Parking accounted for 10% of comments made in surveys and submissions. Most of the comments focused on the **need for more parking in the area**, particularly off-street parking and commuter parking at Auburn Station.

 **Social infrastructure**

Social infrastructure accounted for 7% of comments made in surveys and submissions. Participants said there was a need for **more social infrastructure such as schools, childcare and health services to support population growth**.

 **Traffic**

Traffic accounted for 7% of comments in surveys and submissions, with most people raising **concerns about increased population compounding existing congestion**.

📌 When on-site car parking is not provided the streets get cluttered with overflow parking from units. Wentworth Point demonstrates the failure of not providing adequate parking’.  
– *community feedback*

 **Character and amenity**

Character and amenity accounted for 7% of comments made in surveys and submissions. **The feedback welcomed public amenity improvements for the Precinct, with a preference for landscaping, streetscaping, gathering spaces and more public toilets**. Feedback also showed that the cultural diversity of Auburn was highly valued by the community.

 **Other**

Feedback that could not be accommodated into other listed themes accounted for 6% of comments made in surveys and submissions. Most of these comments were from people stating that the Precinct Plan was unclear and difficult to understand.

 **Open space**

Open space accounted for 3% of comments made in surveys and submissions, with most feedback requesting more open space for the Auburn Precinct.

 **Impacts to property**

Impacts to property accounted for less than 0.5% of comments made in surveys and submissions.

 **Consultation process**

Feedback on the consultation program accounted for less than 0.5% of comments made in surveys and submissions. Suggestions were made for future communications about the Strategy, including:

- letterbox drops
- notices in local libraries
- communications through Wentworth Point Community Central
- information in community languages, and
- consultation with the surrounding communities of Wentworth Point and Sydney Olympic Park.

## Our initial response

Further community consultation will occur prior to any proposed changes to local zoning and development controls. This consultation will occur in line with statutory processes. Where appropriate, key components of the Strategy will be included within the District Plans presently being developed by Greater Sydney Commission (GSC), Department of Planning and Environment (DPE) and councils. The District Plans will then be implemented through councils' Local Environmental Plans (LEPs) in coordination with the delivery of key infrastructure.

Below we have provided our initial responses to the matters most frequently raised in the feedback and outline how we will finalise the Strategy in collaboration with local councils and government agencies.



### Development

- The overall vision and function of the Auburn Precinct will be re-examined. Council, UrbanGrowth NSW, DPE and GSC, through the relevant District Plan, will analyse and determine if Auburn Precinct should:
    - be identified primarily as an economic and employment centre with limited residential uses located close to Auburn Town Centre and the train station as outlined in the draft Strategy.
    - OR
    - whether there is potential to introduce new residential and mixed uses along Parramatta Road and throughout the Precinct, appropriately supported by the further provision of public transport, open space and social infrastructure.
- If this is not resolved in the Strategy it will be addressed in the district planning process.
- A consultant team will assist to review and refine the land uses, scale and access and movement principles. This will include potential mechanisms to incentivise housing and economic growth through adjusted planning controls.
  - The consultant team will also revise the draft Urban Design Guidelines in conjunction with revisions to the Precinct Plans, and specifically respond to community feedback requesting more detailed controls that guide transitions between taller buildings and low density development at the Precinct edges. Particular focus will be on Delhi, Jellicoe, Bombay and Platform Streets as identified in submissions.



### Public and active transport and traffic

- All council and community feedback about transport services will be provided to Transport for NSW (TfNSW) and Roads and Maritime Services (RMS) to inform their public transport and roads planning along the Corridor.
- Rezoning of land will be triggered by mechanisms that align the coordination and delivery of services and infrastructure as identified by DPE and GSC.
- We will examine potential intersection upgrades, road improvements, walking and cycling connections.



### Character and amenity

- The local amenity improvement works proposed as part of the Urban Amenity Improvement Program (UAIP) will need to be reconsidered. Whilst the criteria for determining UAIP works will remain unchanged, the future desired character of the Auburn Precinct may support additional works that could be funded under the draft UAIP.



## Impacts to property

- Further community consultation will occur prior to any proposed changes to local zoning and development controls. These changes will be facilitated and approved by DPE, GSC or the local councils. Rezoning will only occur after the adoption of the final Strategy and is intended to be implemented in stages in response to the delivery of key infrastructure.
- In the event that a compulsory land acquisition is needed to deliver infrastructure or open space, this will occur in full consultation with the landowner. UrbanGrowth NSW does not have the power to make compulsory acquisitions. Any land acquisitions would be undertaken by the state or local government agency responsible for delivering the infrastructure or open space.
- We strongly recommend that landowners obtain independent professional advice prior to making any significant decisions about their property.



## Social infrastructure and open space

- We are working with the NSW Government Architect's Office and other specialist consultants to determine the optimal location, amount and type of future open space and social infrastructure required to support the renewal of the Precinct.
- We will also continue to work closely with the NSW Department of Education (DOE), NSW Health and Local Health District (LHD) to ensure schools and health facilities can support the future population.
- The Urban Amenity Improvement Program and the Open Space and Social Infrastructure Schedule will be updated to include governance, funding and timing arrangements.