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28 September 2020

Mr Jim Betts  
Secretary  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Mr Betts

## 2020 Revised Draft Masterplan for the Carter Street Precinct

The Property Council of Australia welcomes the opportunity to provide comments to the Department on the revised masterplan for the Carter Street Precinct described in the Explanation of Intended Effects (EIE) released in August 2020.

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes, including residential, industrial and office developments. We are pleased to provide the following comments for your consideration:-

It is understood the revised masterplan is seeking to finalise the 2018 exhibited draft planning controls and provide further refinements in response to the announcement of the Sydney West Metro and the opportunity to provide up to 700 additional homes within walking distance of the Metro station. We support the Department's intention to accommodate additional growth within the Precinct, reflective of its increased accessibility to mass public transport.

The key changes outlined in the EIE involve refinement of the existing planning controls for the Carter Street precinct (which became effective in November 2015), including:

- Introduction of several site-specific changes to incentivise maximum heights of buildings, maximum floor space ratios and introduce maximum car parking requirements, so that development uplift is only available to sites within walking catchment of the Sydney Olympic Park Metro station, and
- providing a mechanism for the delivery public benefits such as schools and open space.

It is understood these changes will be implemented through the insertion of new mapping into *Auburn Local Environmental Plan 2010* and an 'Additional Local Provisions' clause to apply site-specific controls to certain land within the Precinct. Additional height and density will be available to certain sites if their redevelopment provides a reduction of car parking. The provision of additional opportunities for the development of housing and employment to support the significant investment in new transport infrastructure is appropriate.

The table below considers each of the key changes proposed to the planning controls for the Precinct:

<b>Planning Provision 2020 Revised draft Masterplan</b>	<b>Response</b>
<u>Land use zones</u> – Minor change to land use zoning map to facilitate local road in between proposed relocated school and adjoining expanded open space. To enable this, it is proposed to rezone the land zoned RE1 Public Recreation under the 2018 exhibited draft Masterplan to R4 High Density Residential.	These changes are supported.
<u>Maximum Building Height</u> – The review includes refinement of the 2018 draft exhibited Height of Buildings controls and refines final tower heights and preferred locations across the Precinct. Site specific amendments which provide an increase to the maximum height of buildings. Increases in building height are focused south of the proposed related school and expanded open space.	These changes are supported.
<u>Floor Space Ratios (FSR)</u> – Refinement of FSR to reflect revised tower heights and preferred locations across the Precinct. Site specific increases to FSR north and south of the proposed relocated school and expanded open space. The increase will facilitate additional height in exchange for capped or reduced car parking.	These changes are supported.
<u>Incentives clause</u> – Incentives clause supported by a Key Sites map, which provides additional floor space and height where reduced car parking is provided. This clause will only apply to selected sites within walking catchment of the Metro station.	This change is supported.
<u>Design Excellence</u> – Refinement of the design excellence criteria to align with the Parramatta LEP 2011 provisions for design excellence and implementation via City of Parramatta’s Design Excellence Advisory Panel. No FSR or height bonuses provided under revised mechanism.	We support the introduction of design excellence as a planning consideration for this Precinct, however, we do not support the use of a competitive design process without height or density bonuses being offered to compensate for the costs incurred through running a design competition.

<p><u>Car Parking Rates</u> – Introduces capped and maximum car parking rates for development on single land holding identified on the Key Sites map. Introduces reduced car parking rates for Key Sites within incentives provision for increased height and floor space.</p>	<p>We generally support this however, there must be interim arrangements put into place to manage the transport needs of residents for the duration of the period before Metro service commences.</p>
<p><u>Active Street Frontages</u> – Introduction of new clause and supporting map to mandate the provision of non-residential uses at ground floor along the identified primary street frontages within B2 Local Centre zone.</p>	<p>These changes are appropriate and supported.</p>
<p><u>Additional Permitted Uses</u> – Additional uses within the R4 High Density Residential zone for small scale food and beverage in high amenity areas, neighbourhood supermarket west of Hill Road, exhibition homes (display apartments) and refinement of the additional permitted uses to reflect the underlying zone’s permissibility at 2 Hill Road.</p>	<p>These changes are appropriate and supported.</p>
<p><u>Development Framework</u> – Introduction of clause to require the consent authority to have regard to the <i>Carter Street Precinct Development Framework</i> in assessing development applications for land in the Carter Street Precinct.</p>	<p>These changes are appropriate and supported.</p>
<p><u>Administrative changes</u> – Reorganisation of existing Carter Street Precinct provisions into a single “Part 7” of the Auburn LEP and remove references to ‘Priority Precinct’ within Auburn LEP.</p>	<p>These changes are appropriate and supported.</p>

### Savings and Transition Arrangements

These proposed changes to the Carter Street Precinct are positive and will take advantage of the benefits the Sydney Metro West will deliver when it is completed. Should any landowner be intending to develop their land on the basis of the current controls that were made in 2015, there should be a savings clause included in the final instrument to allow any existing Development Application that is in the planning system to continue to be determined under those controls.

### Satisfactory Arrangements Clause

Clause 6.8 of *Auburn Local Environmental Plan 2010* requires satisfactory arrangements for provision of ‘designated State public infrastructure’ to be made prior to the approval of any development application within the Carter Street Precinct. The clause applies to development for the purpose of residential accommodation or any commercial purpose.

It is noted that a draft State VPA has been prepared and is currently on exhibition for comment. The VPA has been negotiated the major landowner in the Precinct. It is not clear from the EIE whether other landowners will be required to also negotiate a VPA with the State Government or will contribute to State infrastructure through another mechanism.

Nevertheless, it is important that there is transparency and certainty surrounding the expected contributions that will need to be paid to State and local government authorities so that those costs can be factored into the development feasibility of any redevelopment project.

Should you have any questions regarding the content of this submission please contact Troy Loveday, NSW Policy Manager, on 0414 265152 or [tloveday@propertycouncil.com.au](mailto:tloveday@propertycouncil.com.au)

Yours sincerely



**Belinda Ngo**  
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**Property Council of Australia**