

Gateway Review: 30-46 Auburn Road, Regents Park

27 November 2020
IPC Briefing



Council's Position

Control	Proponent	Council	Department
FSR	2.4:1	1.75:1 (6-8 storeys only)	2:1 (no change)
Building Heights	6 – 12 storeys (Max. 47m)	6-8 storeys (28m)	6-12 storeys (Max. 41m)

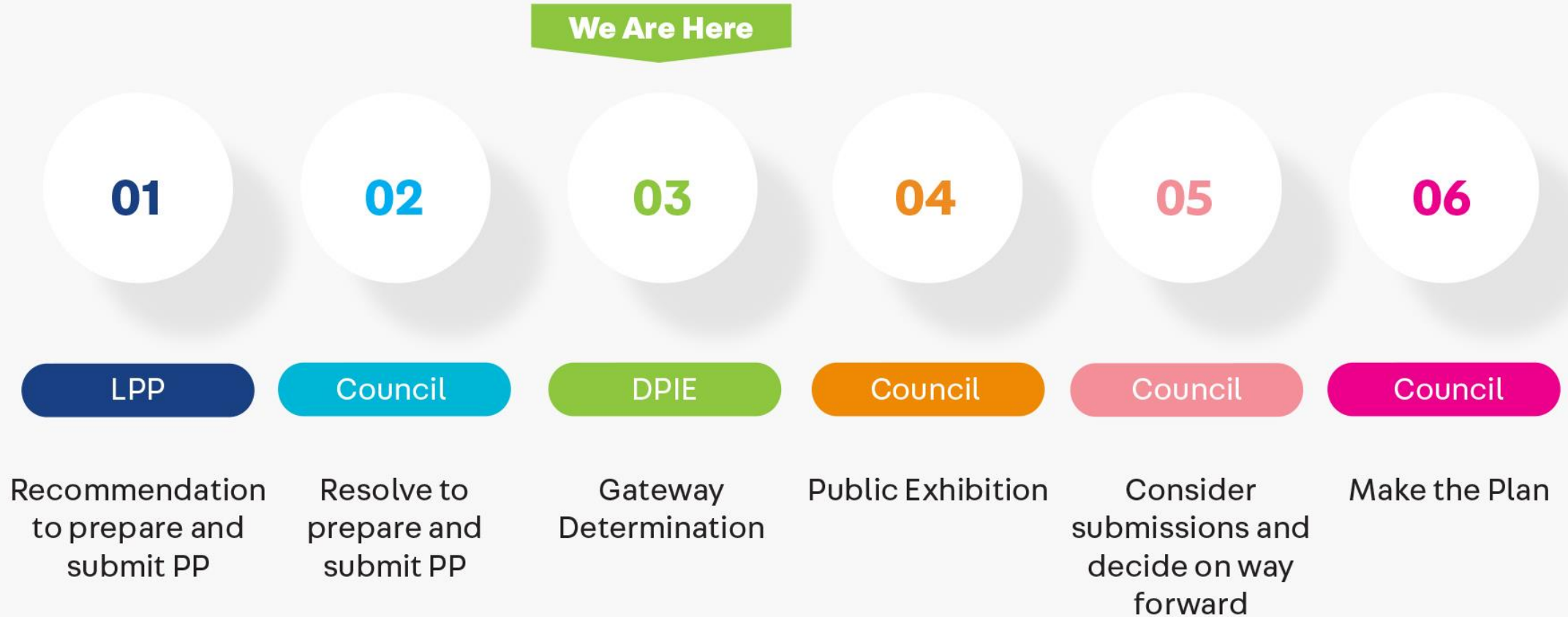
Council's Rationale

- **Consistent with Local strategic framework** including LSPS, Local Area Plans and Housing Strategies;
- Proposed controls are **consistent with 'Small Village Centre'** classification and do not exceed the business zone;
- More **appropriate setbacks** to adjoining industrial land, which is not proposed to change given GSC position;
- **ADG** solar access and separation is more **achievable**;
- Council's proposed height controls minimise **risk of additional storeys** being added.

Council's Position: Other Factors

- Key opportunity site – no other major developments likely on Canterbury Bankstown's portion of Regents Park
- The proponent has not demonstrated any significant public benefit for the increase to density that they are receiving.
- The proponent has not demonstrated a proposal that could reasonably achieve the FSR sought (to close to 2.4:1) without severely compromising the amenity of the site.
- Multiple reviews conducted by various independent experts:
 - **2016** – Pre-gateway Review (decision)
 - **2017** – Independent Hearing and Assessment Panel (IHAP)
 - **2019** – DPIE Review of Gateway
 - **2020** – Gateway Review

Where are we in the Process?



NB: Post-gateway studies to be completed

Subject Site + Context

Subject Site



~ 7 mins (~ 500m) to Regents Park Station



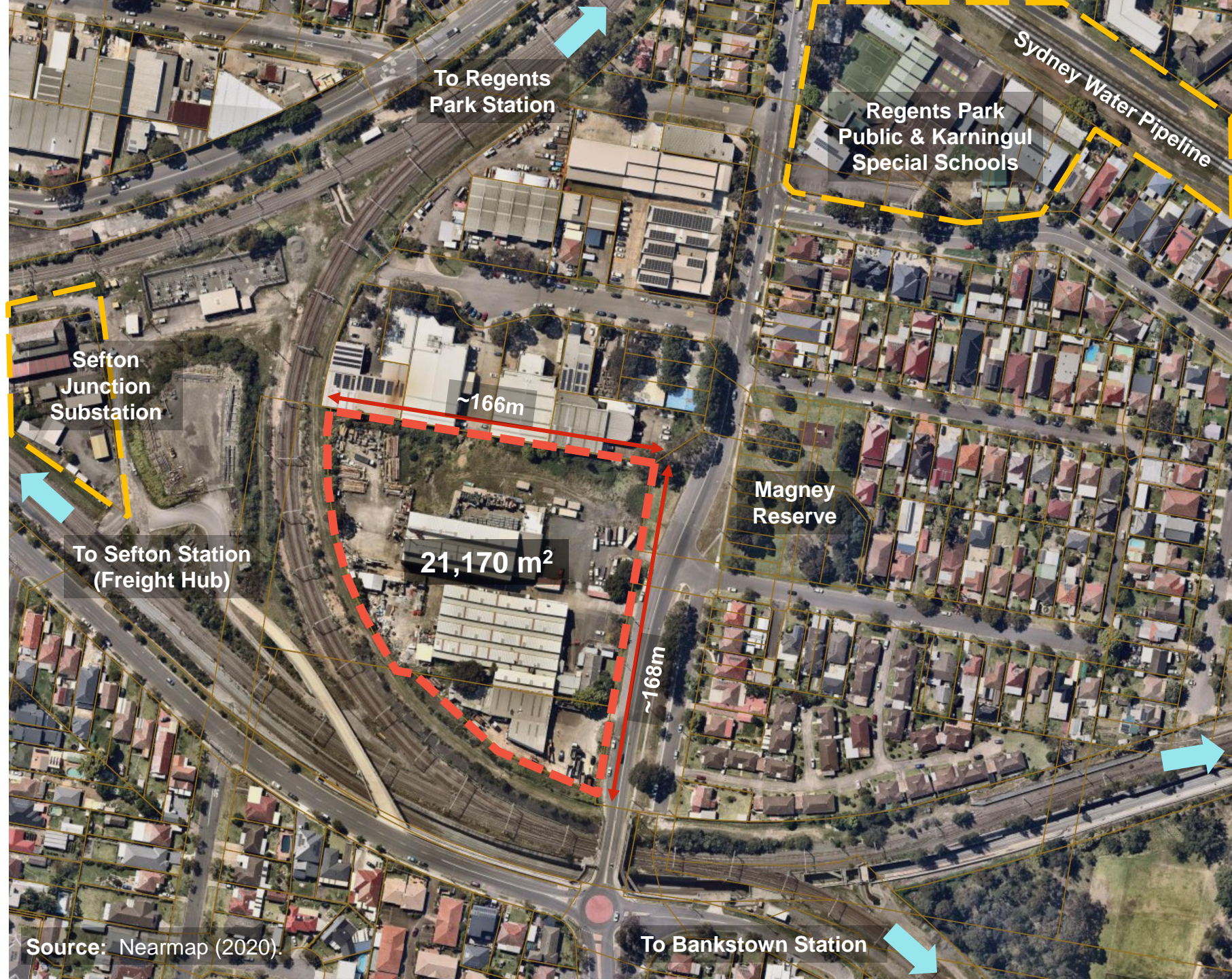
Site area – 2 Ha approximately



168m frontage on Auburn Road








Nearby heritage items



Source: Nearmap (2020)

Subject Site – Context

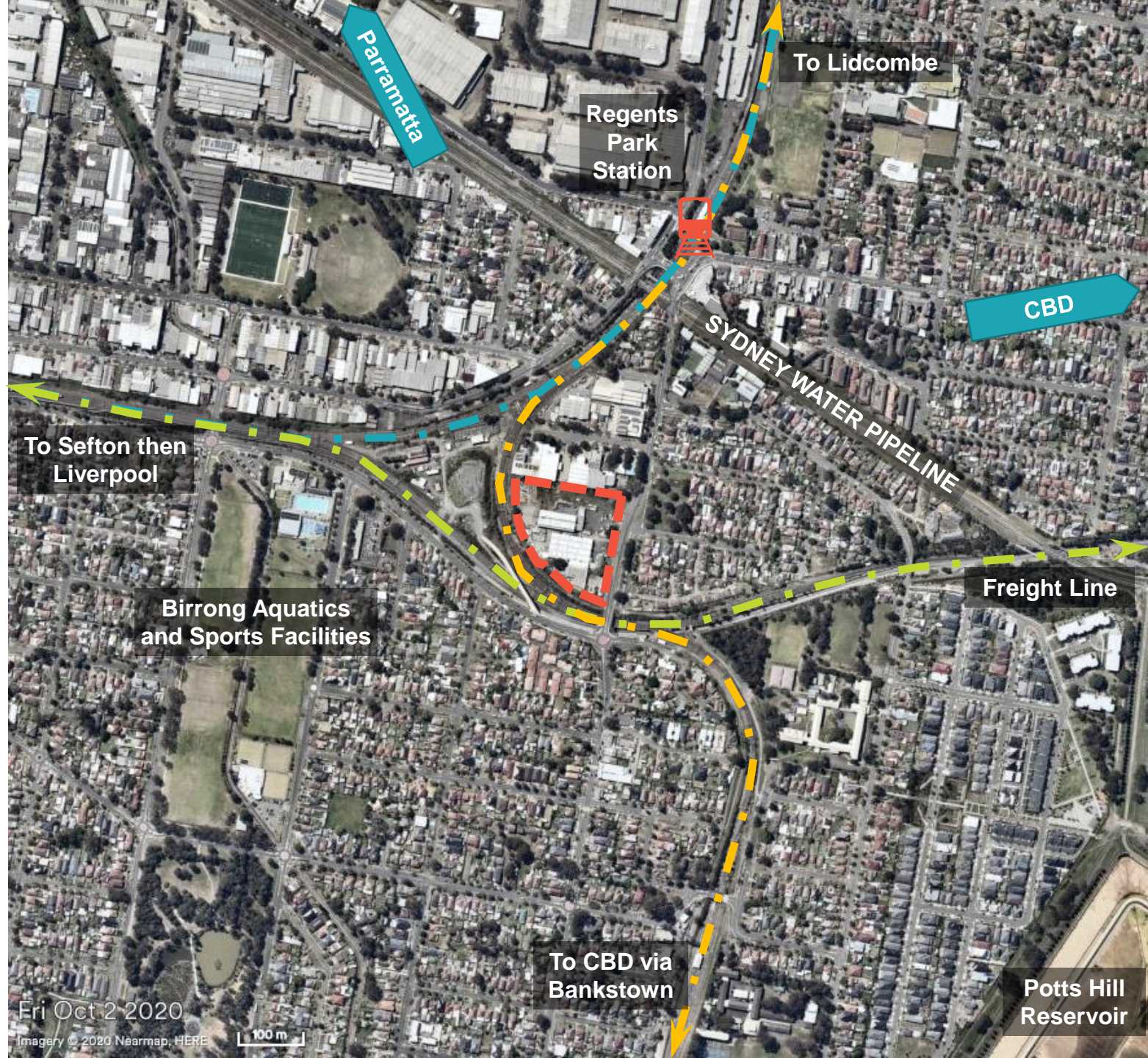
Mode	Sydney CBD	Parramatta
	17km	8km
	50-60 mins	25-35 mins (min. 1 transfer)
	60+ mins	50-60 mins
	35-70 mins	20-45 mins
	~90 mins	40-50 mins

Regents Park Station – Primarily services ‘white collar’ workforce movements by:

- T3** T3 Lidcombe (via Bankstown), and
- T3 Liverpool (via Strathfield) – occasionally.

Western Freight Line

Source: Nearmap (2020).



Existing Control – Land Use Zoning

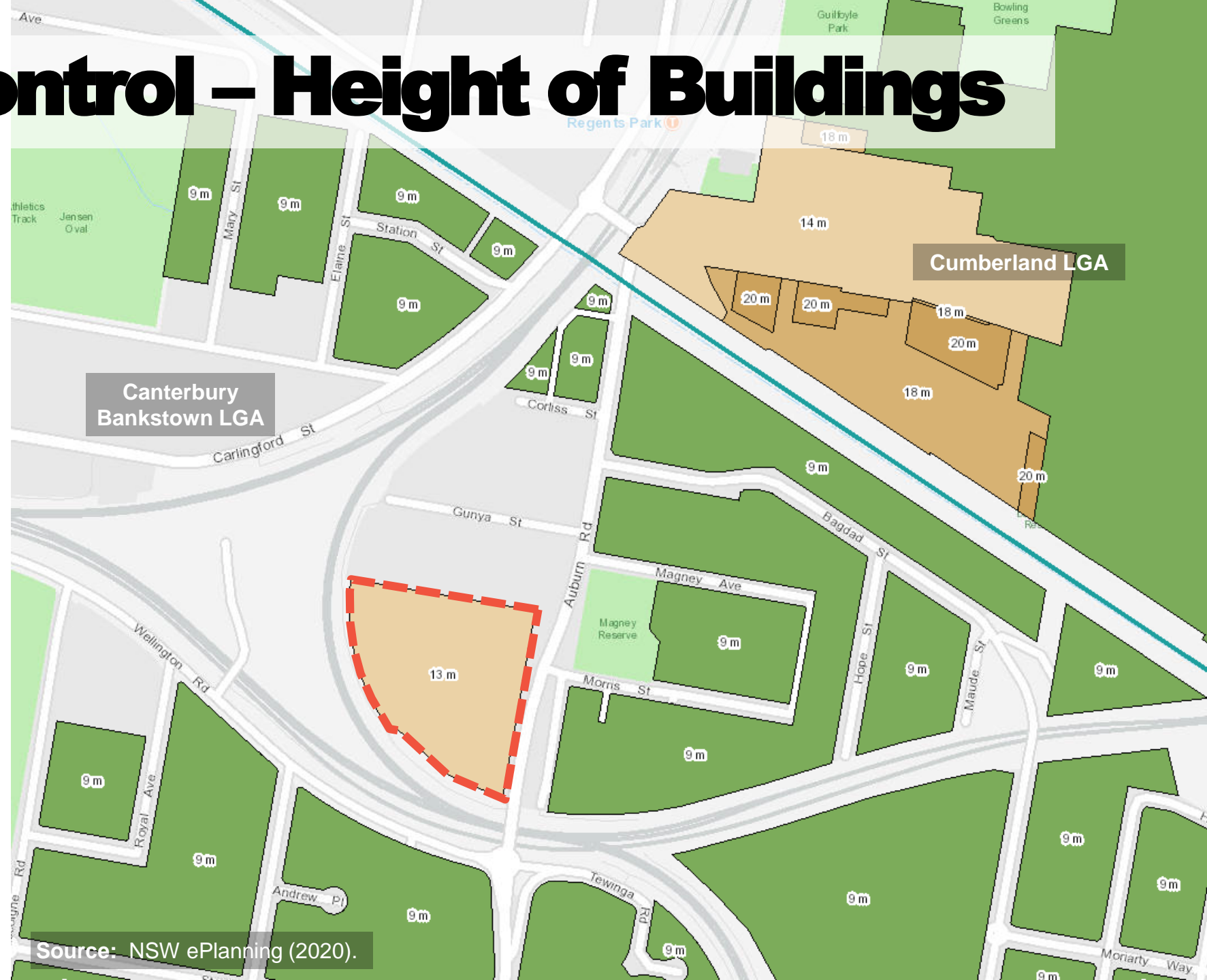
- No change proposed to zoning of the site
- Regents Park Centre is split between our LGA and Cumberland Council
- B2 Local Centre adjacent to train station
- Higher density (R3 & R4) focused in close proximity of business uses
- Isolated R4 next to industrial and low density residential uses.



Source: NSW ePlanning (2020).

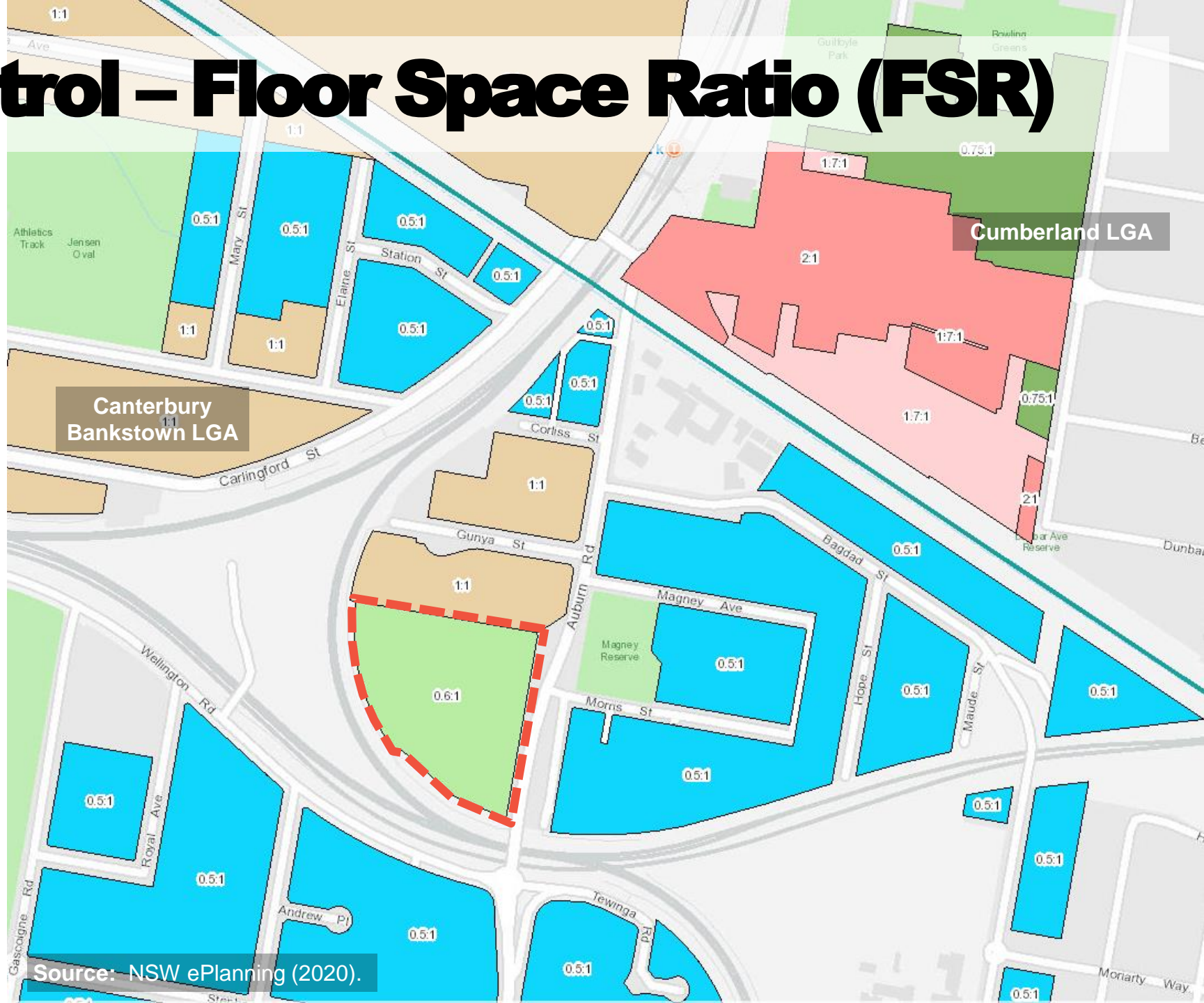
Existing Control – Height of Buildings

- 20m maximum height (~6 storeys) in the R4 High Density Residential directly adjacent to business uses
- Subject site will need to transition to the 9m maximum height across Auburn Road
- Centre hierarchy sets a height cap:
 - 4 storeys for residential uses, and
 - 6 storeys for business uses.



Existing Control – Floor Space Ratio (FSR)

- 2:1 maximum FSR on B2 Local Centre and R4 High Density Residential zoning in Cumberland LGA (close proximity to train station)
- Centre hierarchy sets a maximum FSR of:
 - 1:1 for residential uses, and
 - 2.5:1 for commercial uses.



Street View – North View on Auburn Rd From Bridge



Street View – North View on Auburn Rd

- Looking at 46 Auburn Road from the train crossing bridge



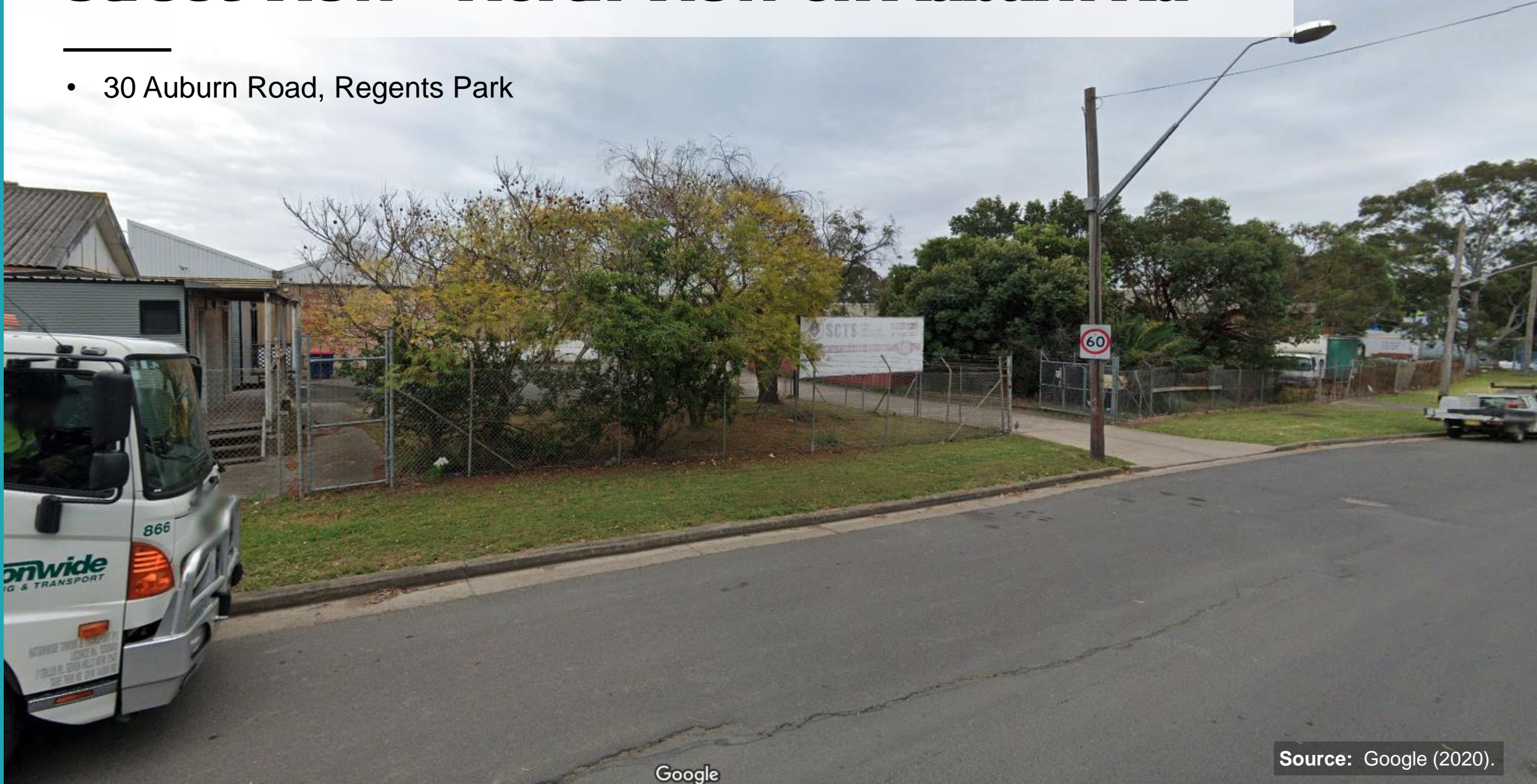
Street View – North View on Auburn Rd

- 46 Auburn Road, Regents Park



Street View – North View on Auburn Rd

- 30 Auburn Road, Regents Park



Street View – North View on Auburn Rd

Magney Reserve

Auburn Rd

MORRIS ST
NO THROUGH ROAD

Street View – South View on Auburn Rd

- 30 Auburn Road, Regents Park



Street View – South View on Auburn Rd

- Intersection of Morris Street and Auburn Road, Regents Park



Street View – Regents Park Centre

- Intersection of Amy Street and Kitchener Avenue, Regents Park (Cumberland LGA)



Street View – Regents Park Centre: Existing R4 High Density Residential

- Rear View from Auburn Road across Sydney Water Pipeline



Planning Proposal Summary

Planning Proposal Overview

Floor Space Ratio (FSR)				
McGregor Coxall Advice (Revised)	Gateway determination (as altered)	Proponent Request	Council Response	Department Recommendation
2.4:1	2:1	2.4:1	1.75:1 (6-8 storeys only)	2:1 (no change)
Building Heights				
McGregor Coxall	Gateway determination (as altered)	Proponent Request	Council Response	Department Recommendation
6 storeys – 23m	6 storey – 19m	6 storeys – 23m	6 storeys – 22m	6 storeys - 23m (+4m)
8 storeys – 29m	8 storeys – 25m	8 storeys – 29m	8 storeys – 28m	8 storeys - 29m (+4m)
12 storeys – 47m	12 storeys – 38m	12 storeys – 47m	NIL. If applied, 12 storeys – 41m	12 storeys - 41m

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FSR Control Rationale

Floor Space Ratio (FSR)		
Proponent Request	Council Response	Department Recommendation
2.4:1	1.75:1 (6-8 storeys only)	2:1 (no change)
Likely Development Outcomes		
<ul style="list-style-type: none"> Minimal setbacks (1-3m along ALL edges) 12 storey element (inconsistent with strategic and site-specific merit test) Significant overshadowing issues 	<ul style="list-style-type: none"> Supports appropriate setbacks for surrounding constraints (train, road and industrial) Consistent with strategic and site-specific merit test Minimal solar access issues 	<ul style="list-style-type: none"> Supports appropriate setbacks for surrounding constraints (train, road and industrial) 12 storey element (inconsistent with strategic and site-specific merit test) Overshadowing issues.

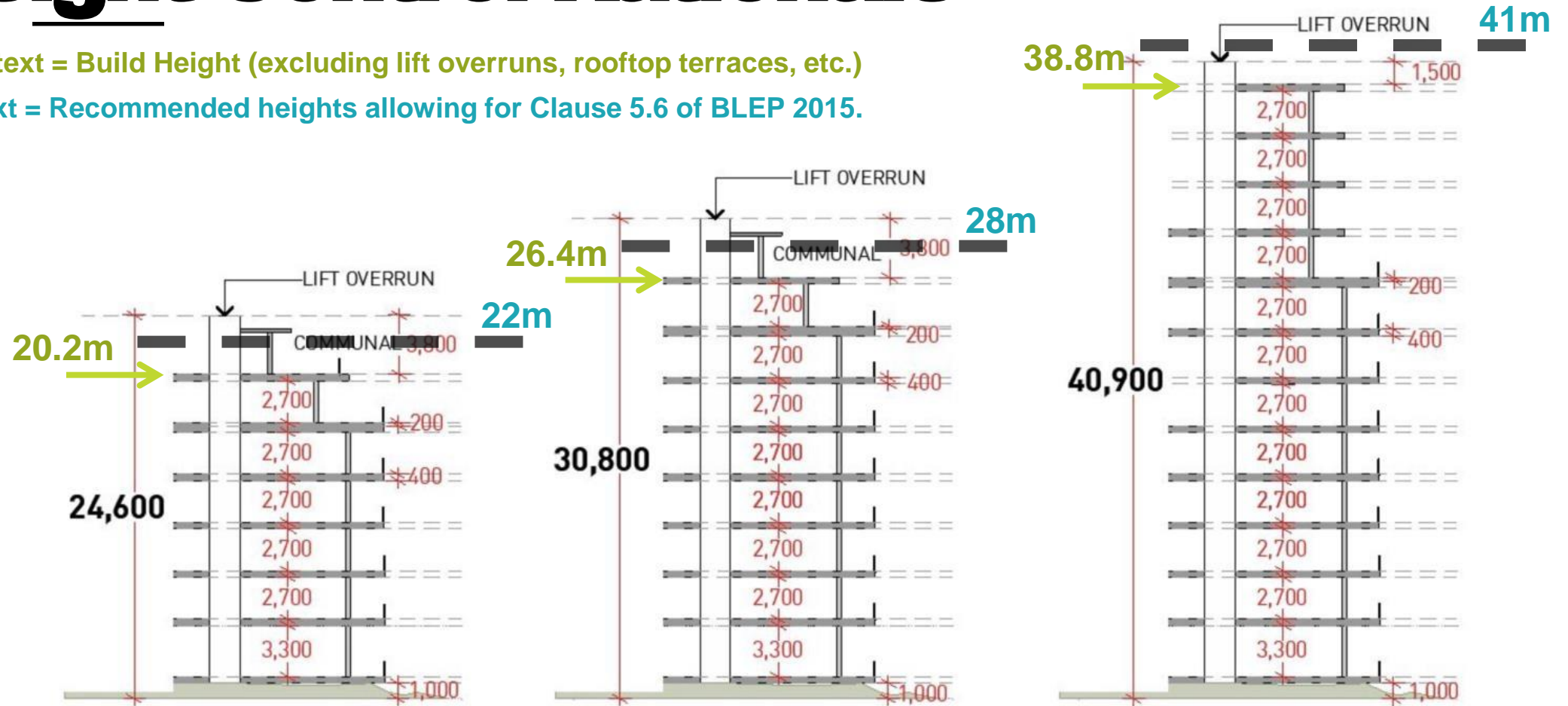
NB: Red, yellow and green 'traffic lights' represent the effectiveness of FSR to influence or direct a development outcomes which benefits the community.

- **Other FSR's** proposed:
 - Are **inconsistent** with the strategic and site-specific merit test for all planning proposals.
 - Create solar access issues to be resolved at the DA stage due to inclusion of a 12 storey element.
- **Council's** supports the recommended FSR of **1.75:1** as it is:
 - **consistent** with the strategic and site-specific merit test.
 - Supports appropriate setbacks
 - ADG Solar Access requirements is should be achievable.

Height Control Rationale

Green text = Build Height (excluding lift overruns, rooftop terraces, etc.)

Teal text = Recommended heights allowing for Clause 5.6 of BLEP 2015.



6 STOREY

Proponent – 23m

Council – 22m

DPIE – 23m

8 STOREY

Proponent – 29m

Council – 28m

DPIE – 29m

12 STOREY

Proponent – 47m

Council – Nil / 41m

DPIE – 41m

Public Benefit Proposed

- Central Green Site Area = 16% of site (~3,400m²)
- Publicly accessible private open space
- Minimum ADG requirement – 25% of the site.
- Unless an increased FSR (>2.25:1) is offered the Applicant has indicated they will not support any other public benefits.



Source: Ground Floor Plan (MRA Studios) dated February 2020



A
990 m²
12 Storey

B
857 m²
8 Storey

G
874 m²
6 Storey

H
701 m²
6 Storey

D
352 m²
8 Storey

I
1,081 m²
6 Storey

C
763 m²
8 Storey

F2
331 m²
8 Storey

F1
320 m²
8 Storey

E
724 m²
8 Storey

Plans

Figure (right): Proponent's Proposed Scheme with McGregor Coxall Heights (Image prepared by DPIE)

Brief Overview of Proposal's History

- **Feb 2014** – Proponent applied for 4:1 FSR
- **May 2016** – North Central Local Area Plan endorsed by Council (covers site area)

The proposal has been reviewed at multiple points along the way by various independent experts:

- **2016** – Pre-gateway Review (decision)
- **2017** – Independent Hearing and Assessment Panel (IHAP)
- **2019** – DPIE Review of Gateway
- **2020** – Gateway Review

The ongoing debate has been related to the FSR and height controls.

Strategic + Site-Specific Merit Test

As outlined in *A Guide to Local Environmental Plans* by DPIE

Strategic Merit Test – Part 1

1.1 Does the proposal give effect to the relevant District Plan with the Greater Sydney Region?

Greater Sydney Regional Plan

Objective 4 – Infrastructure use is optimized

Objective 7 – Communities are healthy, resilient and socially connected

Objective 10 – Greater housing supply

Objective 11 – Housing is more diverse and affordable

Objective 14 – Integrated land use and transport creates walkable and 30-minute cities

South District Plan

Planning Priority S1 – Planning for a city supported by infrastructure

Planning Priority S5 – Providing housing supply, choice and affordability with access to jobs, services and public transport

Planning Priority S12 - Delivering integrated land use and transport planning and a 30-minute city

Planning Priority S16 – Delivering high quality open space

Strategic Merit Test – Part 1 (Cont)

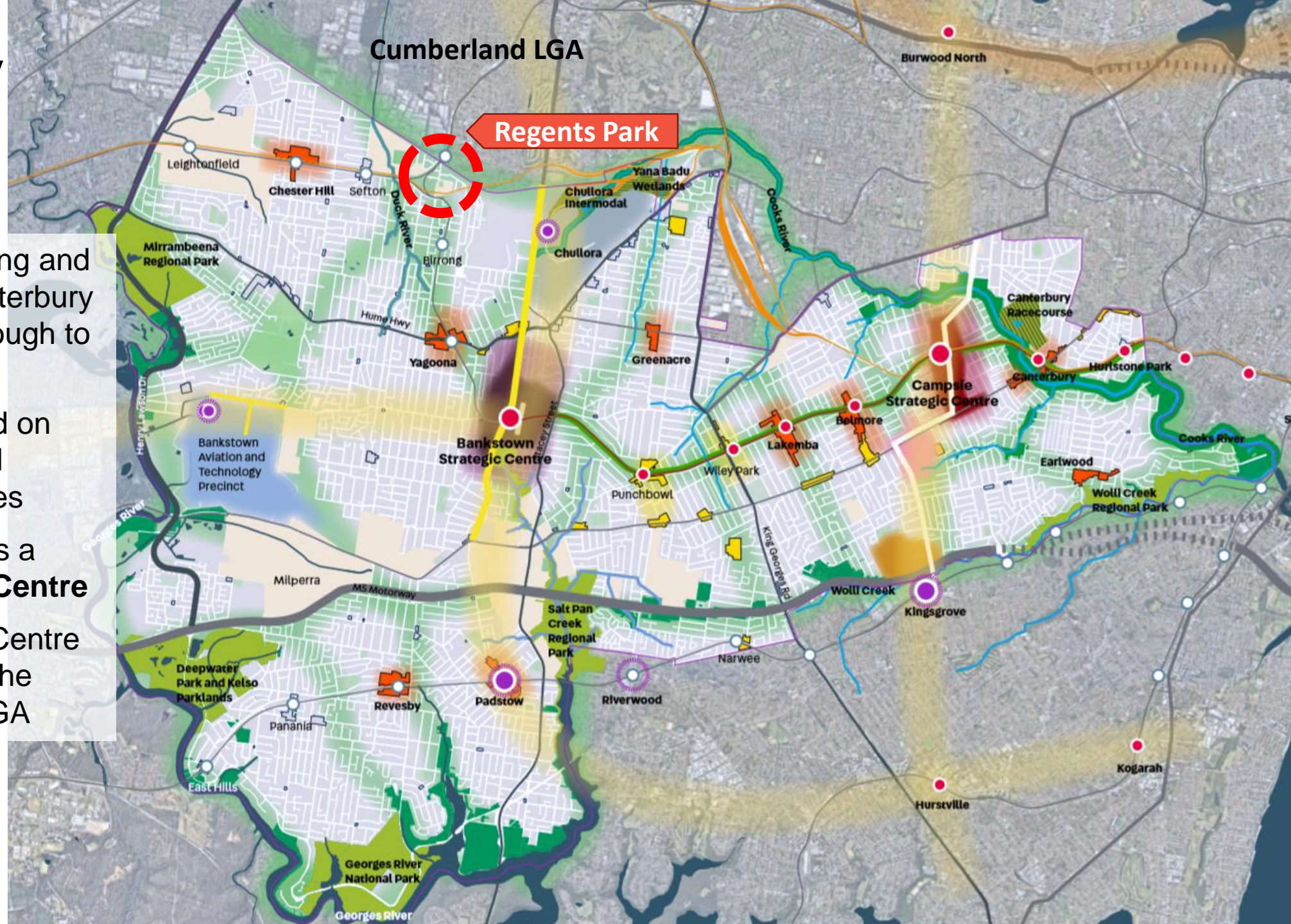
1.2 Does the proposal give effect to relevant LSPS or Strategies endorsed by the Department of Planning?

- The proposal **does not align** with the local strategic planning documents of either Canterbury Bankstown or Cumberland Council.
- The following slides demonstrates that the proposal has little alignment with the housing targets for Regents Park or the associated hierarchy of centres which guides development across Canterbury Bankstown.



CBCity LSPS

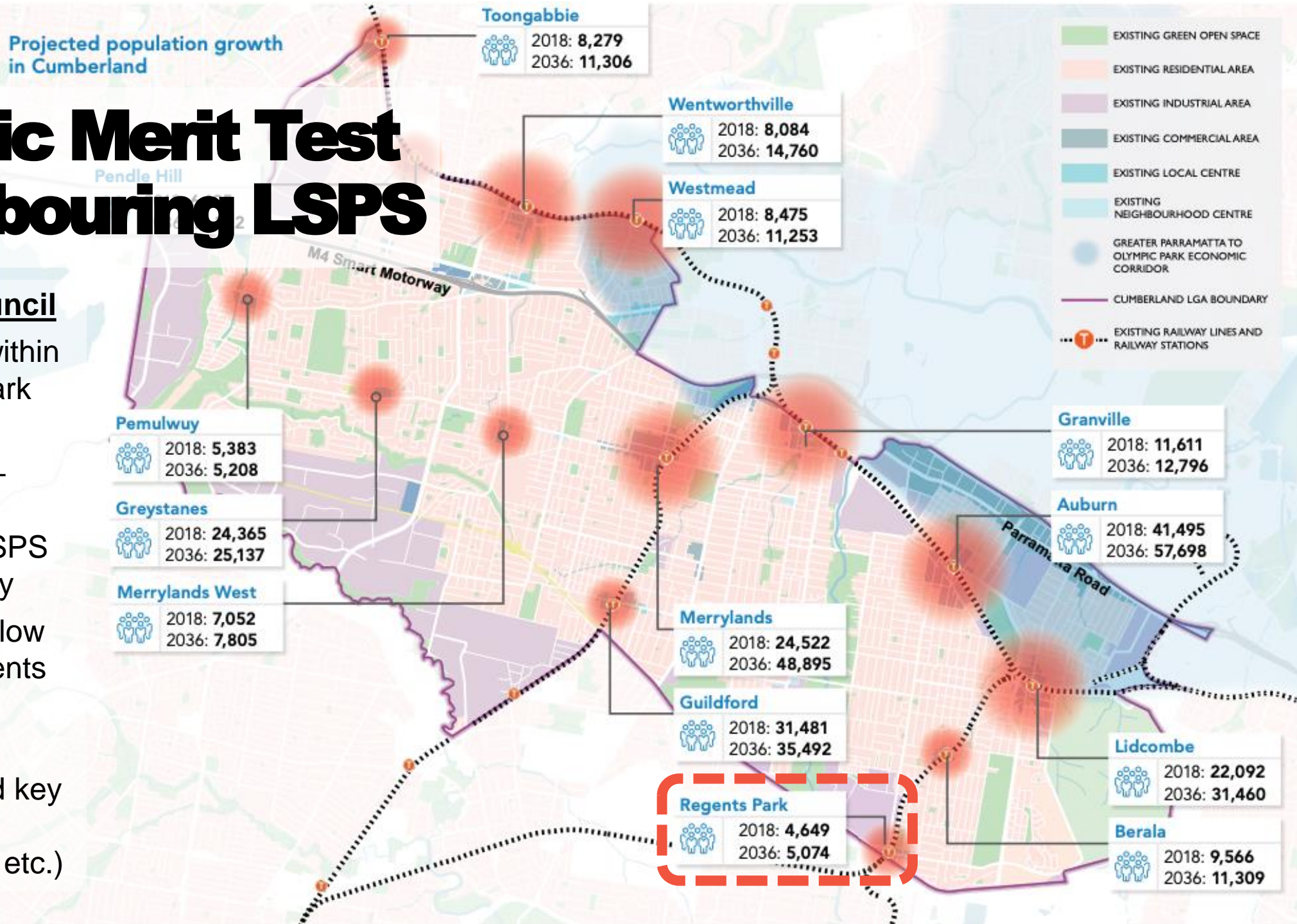
- Plans for housing and job across Canterbury Bankstown through to 2036
- Growth focused on Bankstown and Campsie centres
- Regents Park is a **Small Village Centre**
- Regents Park Centre is shared with the Cumberland LGA



Strategic Merit Test – Neighbouring LSPS

Cumberland Council

- Minimal uplift within the Regents Park Centre.
- **Local Centre** – Lowest level in Cumberland LSPS centre hierarchy
- Predominately low density in Regents Park ward
- Higher density housing around key centres (i.e. Lidcombe, etc.)



Canterbury Bankstown Housing Strategy

- 80/20 approach to growth
- Guided by the hierarchy of centres
- **50,000 dwellings across the LGA**
- 2,600 dwellings over 11 small village centres (~ 240 each – e.g. Regents Park)

Centres Hierarchy	Housing Target	No. of Centres	B2 Local Centre Zone		R4 High Density Residential Zone	
			Height	FSR	Height	FSR
Strategic Centres	18,100	2	Under assessment	Under assessment	Under assessment	Under assessment
Local Centres	10,100	9	TBA	TBA	TBA	TBA
Village Centres	9,100	12	6-8 storeys (< 26m)	2.5:1 – 3:1	4-6 storeys (< 20m)	1:1 – 1.5:1
Small Village Centres	2,600	11	4-6 storeys (< 20m)	2:1 – 2.5:1	3-4 storeys (< 15m)	0.75:1 – 1:1
Neighbourhood Centres (in Suburban Areas)	10,100	Not identified	3-4 storeys (< 15m)	1.5:1 – 2:1	3-4 storeys (< 15m)	0.75:1 – 1:1

Strategic Merit Test – Part 1 (Cont.)

1.3 Is the proposal responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognized by existing strategic plans.

- The proposal is not responding to a change in circumstances.

Site Specific Merit Test – Part 2

2.1 Does the proposal have regard to the natural environment (including known significant environmental values, resources or hazards)?

- The proposal is not affected by any known significant environmental values, resources or hazards in the natural environment.

2.2 Does the proposal have regard to the existing uses, approved uses and likely future uses of land in the vicinity of the proposal site?

- The site is currently zoned R4 High Density Residential, with an FSR of 0.6:1 and 13m building height limit (3-4 storeys) reflective of the surrounding 1-2 storey R2 Low Density Residential.
- The 2.4:1 FSR and 6-12 storey building heights with minimal setbacks (1-3m) sought by the applicant **does not have regard** to the existing low density uses and likely future uses of the surrounding land. Especially the industrial lands which would be unfairly encumbered by setback requirements if rezoned to a residential use, under the applicant's latest scheme.

Site Specific Merit Test – Part 2 (cont.)

2.3 Does the proposal have regard to the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision?

- Beyond the publicly accessible green space (close to minimum ADG requirements), the proposal doesn't have regard to increased demand for services or infrastructure from the proposal.
- Minimal public benefit for the increased density and height sought.
- Local area plans outline required infrastructure and the applicant only proposes to support some of these.

Council has previously recommended the following indicative improvement works in the local area:

- Embellish Magney Reserve
- Construct footpaths on both sides of Auburn Road and the streets surrounding Magney Reserve
- Embellish local streets with street trees
- Formalise a north-south cycle link along Auburn Road

Merit Test Summary

The increased controls sought in this Gateway Review by the applicant do not meet all of the strategic and site-specific merit tests.

Strategically

1. **Inconsistent** with local strategic documents (LSPS and Housing Strategy as endorsed by DPIE)
 - Hierarchy of centres
 - Nearly triples delivery of anticipated housing targets for the Regents Park 'Small Village' Centre

Site-specifically

1. Lack of regard to existing uses, approved uses and likely future uses of land in the vicinity of the proposal site. To achieve a 2.4:1 FSR the applicant utilises:
 - Insufficient setbacks,
 - Significant impacts on resident amenity,
 - Inappropriate heights for the local area.
2. Lack of increased services or provisions to support the increased demand from the planning proposal beyond development contribution fees.

Supports Council's position that 1.75:1 and 6-8 storey buildings is appropriate in Regents Park, not the 2.4:1 and 12 storey structures sought by the applicant.

Site Analysis

By Architectus

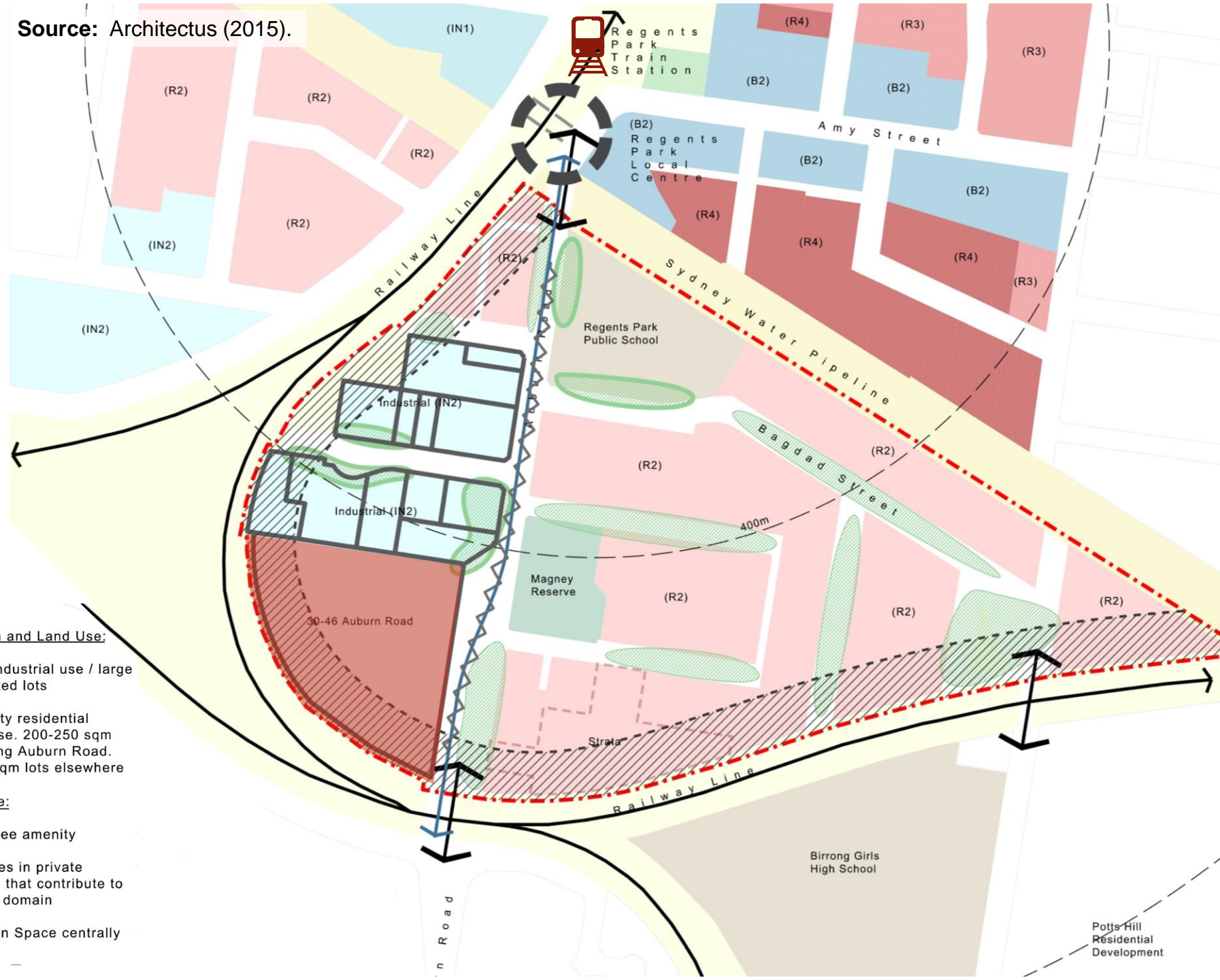
Site Analysis

Source: Architectus (2015).

Legend

- - - Precinct Boundary
- Location:
- 400m / 800m catchment from Regents Park Train Station
- Bus Routes
- Local Schools
- Pedestrian link to Birong Leisure Centre
- Regents Park Local Centre shops and services
- Transport:
- Limited local road connections
- Heavy Vehicle Traffic
- Traffic Congestion
- Railway Noise
- Railway Line

- Built Form and Land Use:
- Existing Industrial use / large consolidated lots
- Low density residential existing use. 200-250 sqm lots fronting Auburn Road. 500-600 sqm lots elsewhere
- Landscape:
- Existing tree amenity
- Large Trees in private ownership that contribute to the public domain
- Local Open Space centrally located



Potts Hill Residential Development

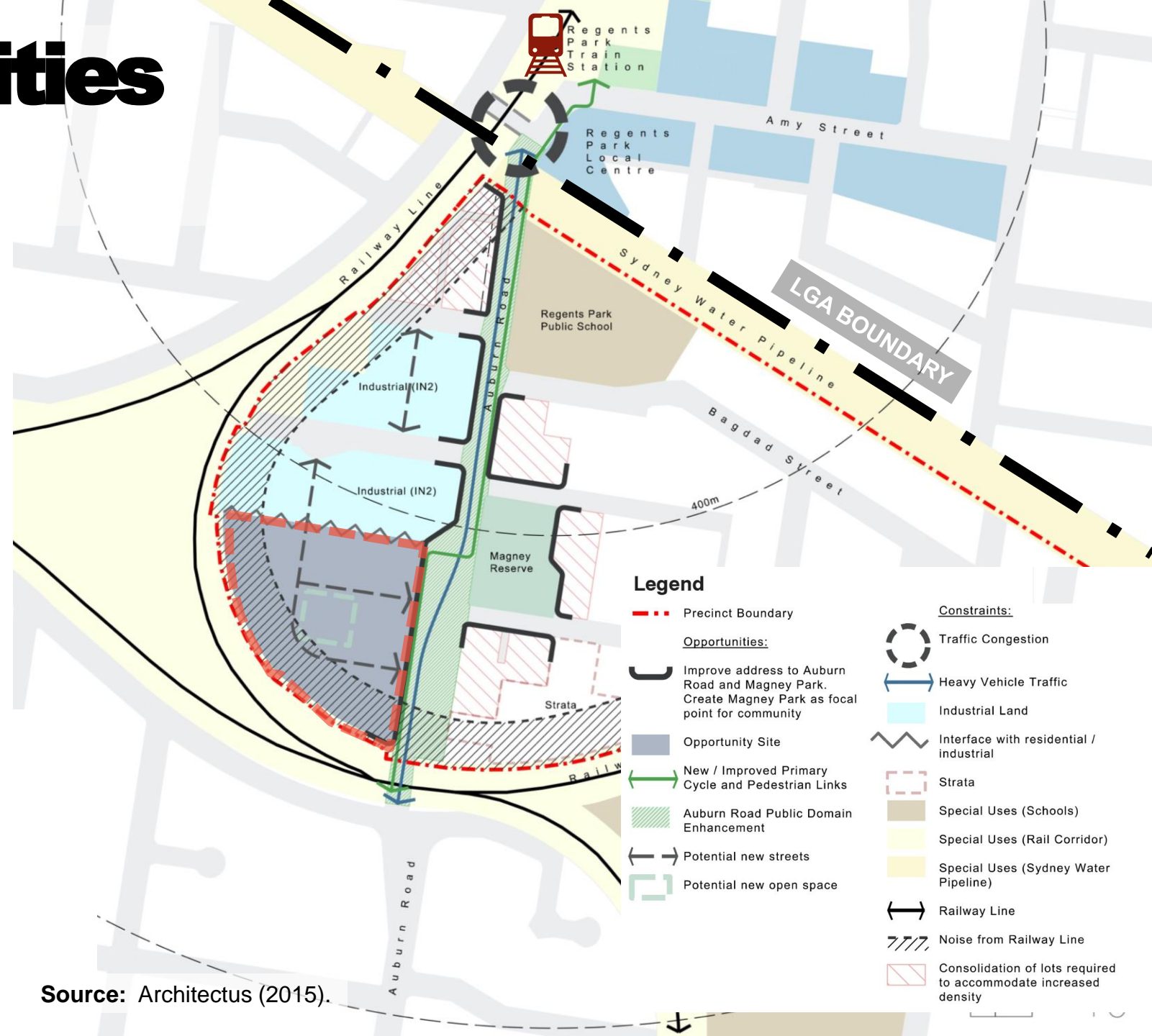
Site Opportunities + Constraints

Proponent's Position

- The site is unconstrained

Council's Response

- Train line – Heavy freight and passenger
- Industrial uses
- Low-medium density residential context
- Auburn Road – hard edge with heavy traffic
- Bridges constrain connectivity
- Heritage within surrounding context

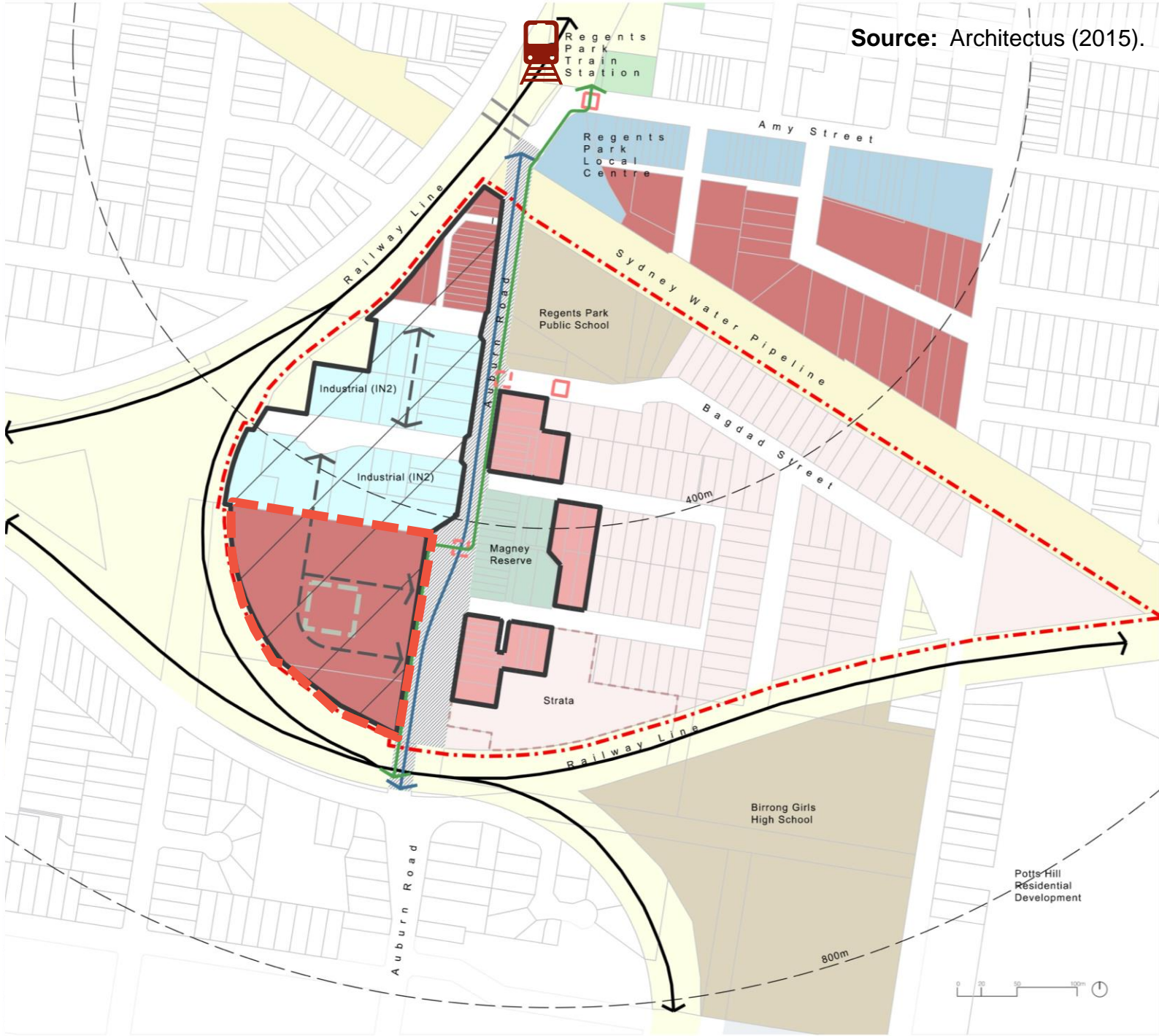


Source: Architectus (2015).

Vision

Legend

- · - · Precinct Boundary
- Land Uses:
- Residential (low density)
- Residential (medium density)
- Residential (high density)
- Local Centre
- Industrial
- Public Open Space
- Growth Area - residential intensification of opportunity sites
- Transition Area - adjacent low density residential areas
- Special Uses (Schools)
- Special Uses (Rail Corridor)
- Special Uses (Sydney Water Pipeline)
- Potential new open space
- Movement:
- Primary Road Movement Corridor - Auburn Road - including bus routes
- New / Improved Primary Cycle and Pedestrian Links
- Pedestrian Crossing (existing)
- Pedestrian Crossing (recommended - subject to RMS approval)
- Auburn Road Public Domain Enhancement
- Potential new streets



Source: Architectus (2015).

UD Analysis – Proposed Development

By Architectus

Introduction

Architectus history of engagement

- Have been engaged on behalf of Council since 2014
- Reviewed latest design submissions
- Numerous different team members have undertaken reviews over the years (all with same density conclusions), Greg Burgon consistent as team lead

Key issues identified

- Maximum height
- Building setbacks
- Solar access to each building
- Length of building, natural ventilation and building site coverage
- Access and address
- Maximum FSR



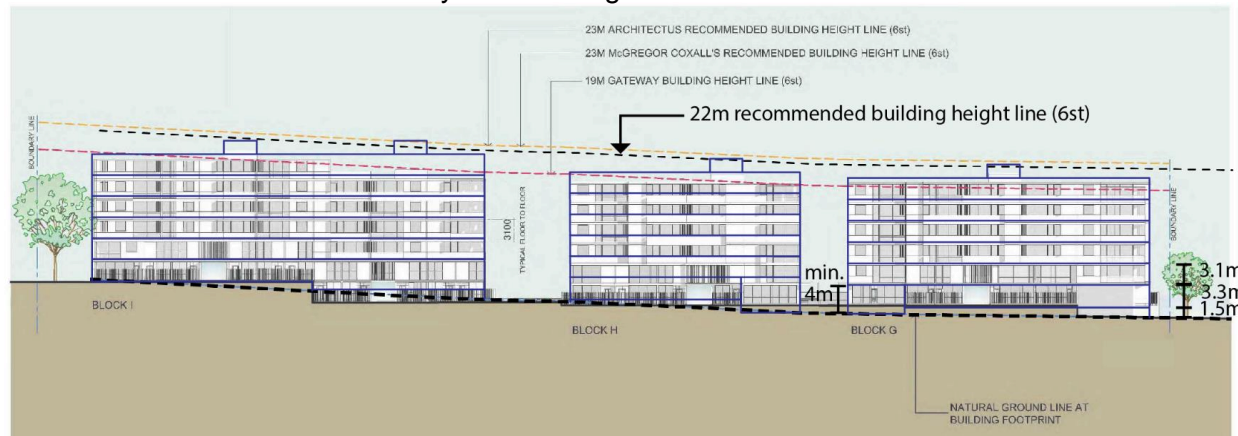
Source: Proponent's Proposed Scheme with McGregor Coxall Heights (Image prepared by DPIE)

Maximum Building Heights

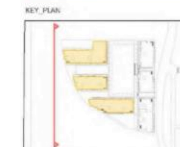
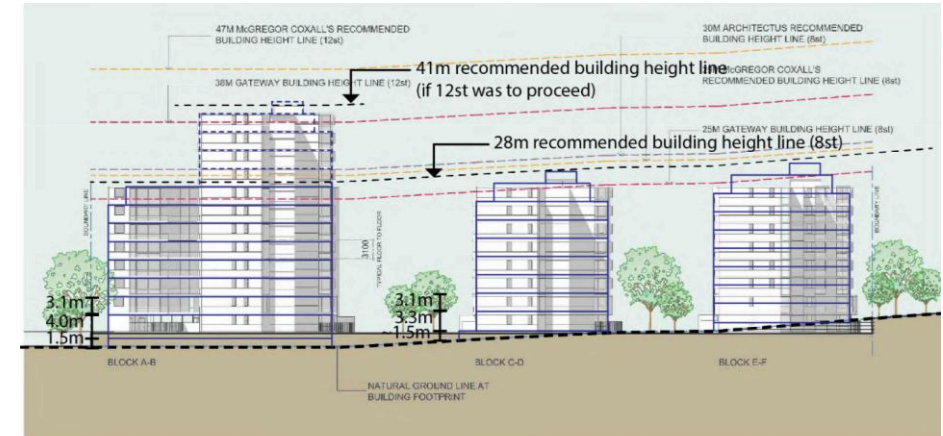
Building Heights			
	Proponent (S&T Rec.)	Architectus	Department
Auburn Road edge	6 storeys – 25m	6 storeys – 22m	6 storeys - 23m (+4m)
Rest of Site	8 storeys – 31m	8 storeys – 28m	8 storeys - 29m (+4m)
NW Corner	12 storeys – 41m	NIL. If applied, 12 storeys – 41m*	12 storeys - 41m

- Disagrees with 12 storey maximum as this is outside the range of heights for similar areas in the LGA and would have undesirable view and overshadowing impacts

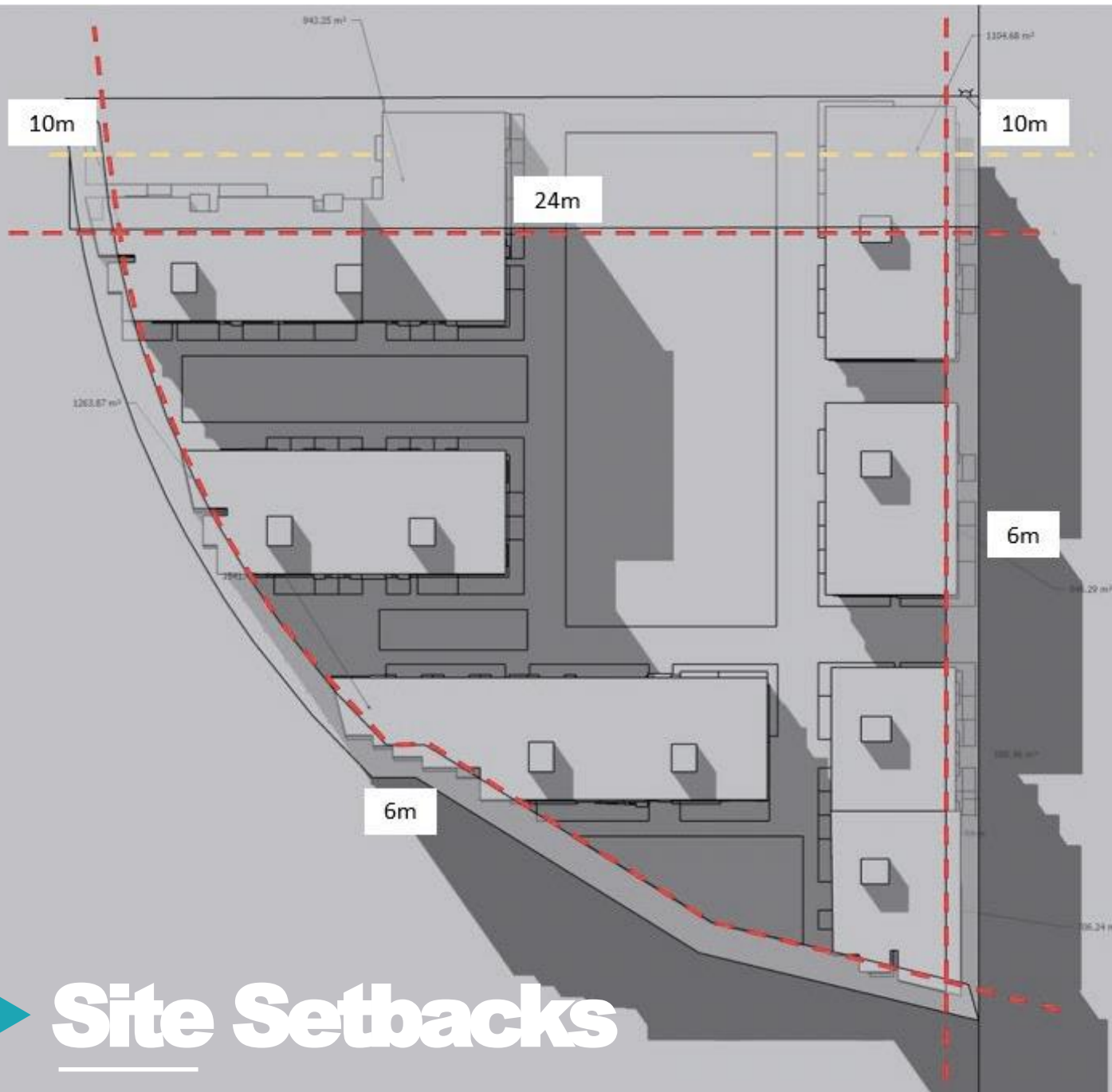
* As per Bankstown LEP 2015, Clause 5.6, roof features including lift overruns and accessible roof terraces that do not contribute to GFA may exceed height with dev. consent



ELEVATION - AUBURN ROAD (EAST)



ELEVATION - RAILWAY CORRIDOR (WEST)



Setbacks important to:

- maintain appropriate amenity protection from adjacent land uses (ie, industrial, rail and major road),
- Allow for deep soil planting and shared cycle paths.
- The lack of appropriate setbacks, residential amenity impacts and overall building bulk suggests the building footprint coverage is too large for the site.

Figure (left): Proponent's scheme (Studio MRA – August 2020) with Council's setbacks. Source: Attachment M, DPIE Review, November 2020

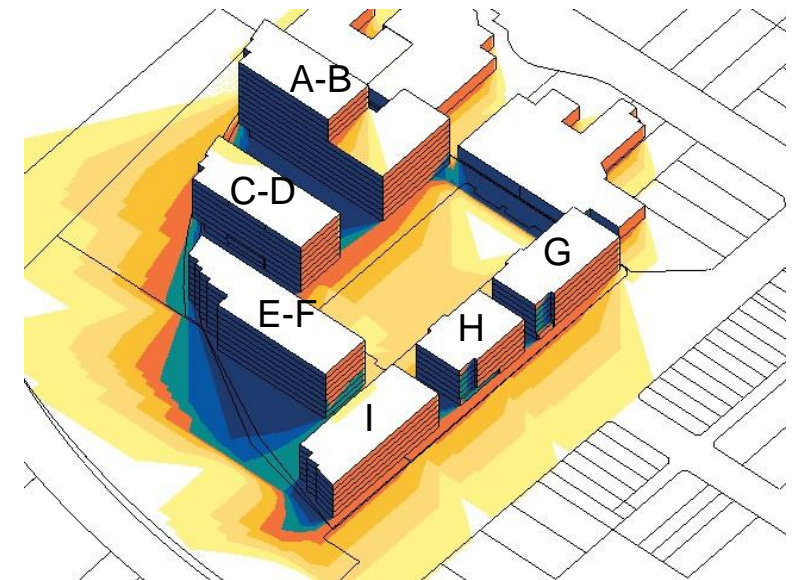
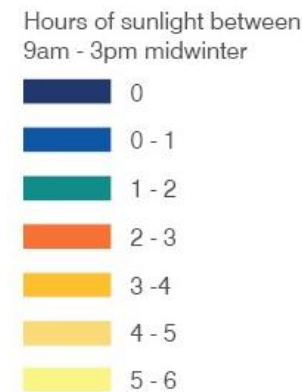
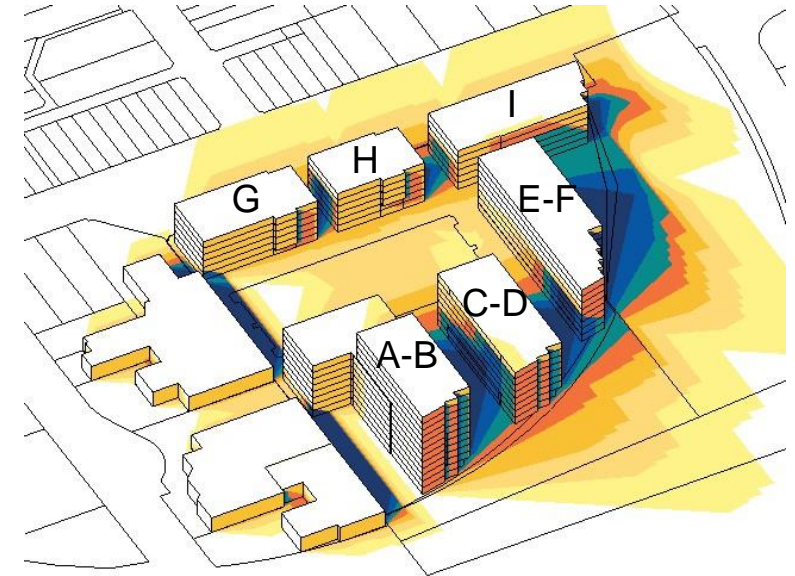
Site Setbacks

Table 1: Proposed Setbacks for 30-46 Auburn Road, Regents Park.

Surrounding Use	Apartment Outlook on to use	Council Proposed (NCLAP)	Applicant Design (Apr 20)	Variance
Auburn Road	Yes	6m	2.8m – 3.7m	> -2.3m
Industrial Land	No	10m	2.3m – 3m	> -7m
	Yes	24m	18m	-6m
Railway Corridor	No	6m	1.5m – 2m	> -4m

Solar Access

- ADG quite clear on individual ‘building’ approach to solar analysis, not collectively as advised by the Proponent.
- Buildings A-B, C-D and E-F **fail to comply** individually with the maximum 15% requirement in a building receiving no sun (ADG objective 4A-1.3).
- In addition, buildings C-D and E-F **also fail to comply individually with the minimum 70% of apartments** receiving at least 2 hour direct sunlight between 9am-3pm mid winter (ADG objective 4A-1.1)



Source: Solar access map, 9am to 3pm mid-winter, prepared by Smith & Tzannes in their peer review, dated August 2020

Solar Access

- The proponent provided more detail floorplate layouts and ADG analysis to demonstrate compliance.
- While the proponent has amended plans since Architectus' review in June 2020 to reduce south facing units and maximise mid winter solar access, not all apartments comply on a building by building basis
- With the western side of the site (Buildings A-B, C-D and E-F) housing 69.3% of the proposed yield for the entire site, ADG non-compliance is not acceptable

Number of units achieving solar compliance to living rooms

Target: min. 70% per building

<u>Building A-B</u>	104/189 units (55.0%)
<u>Building C-D</u>	54/101 units (53.5%)
<u>Building E-F</u>	77/126 units (61.1%)
<u>Building G</u>	60/60 units (100.0%)
<u>Building H</u>	60/60 units (100.0%)
<u>Building I</u>	45/45 units (100.0%)
TOTAL	444/600 units (74.0%)

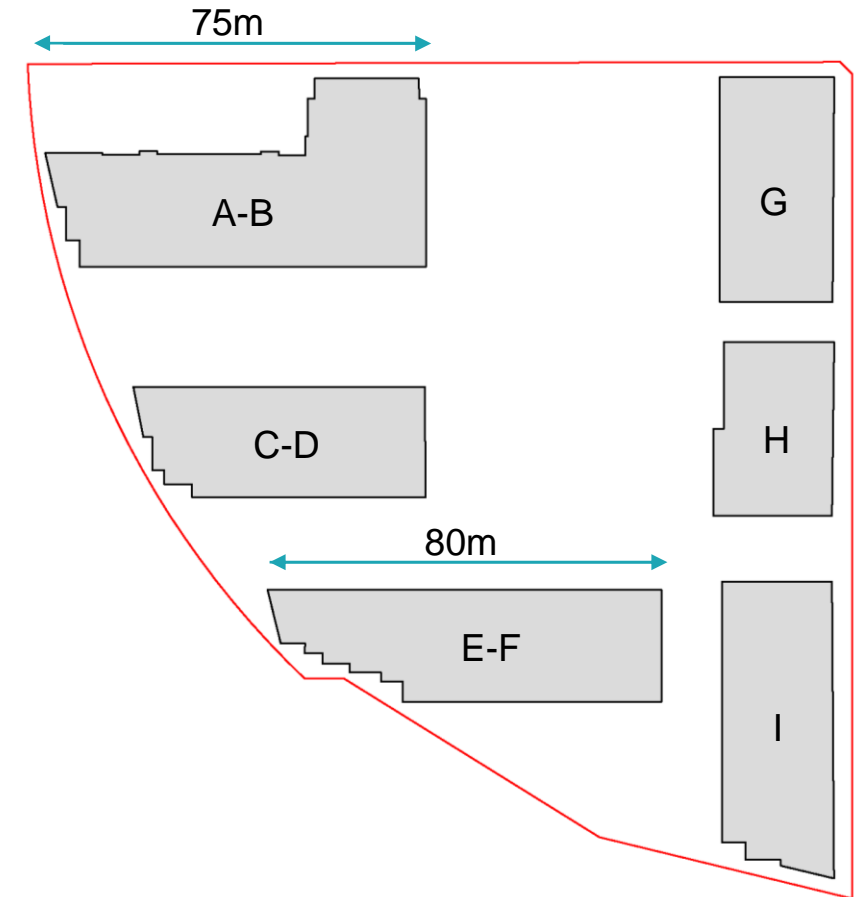
Number of units receiving no sun during mid winter

Target: max. 15% per building

<u>Building A-B</u>	35/189 units (18.5%)
<u>Building C-D</u>	27/101 units (26.7%)
<u>Building E-F</u>	34/126 units (27%)
SUB-TOTAL	96/416 units (23.0%)
<u>Building G</u>	0/60 units (0.0%)
<u>Building H</u>	0/45 units (0.0%)
<u>Building I</u>	0/79 units (0.0%)
TOTAL	96/600 units (16.0%)

Length of building, natural ventilation & footprint coverage

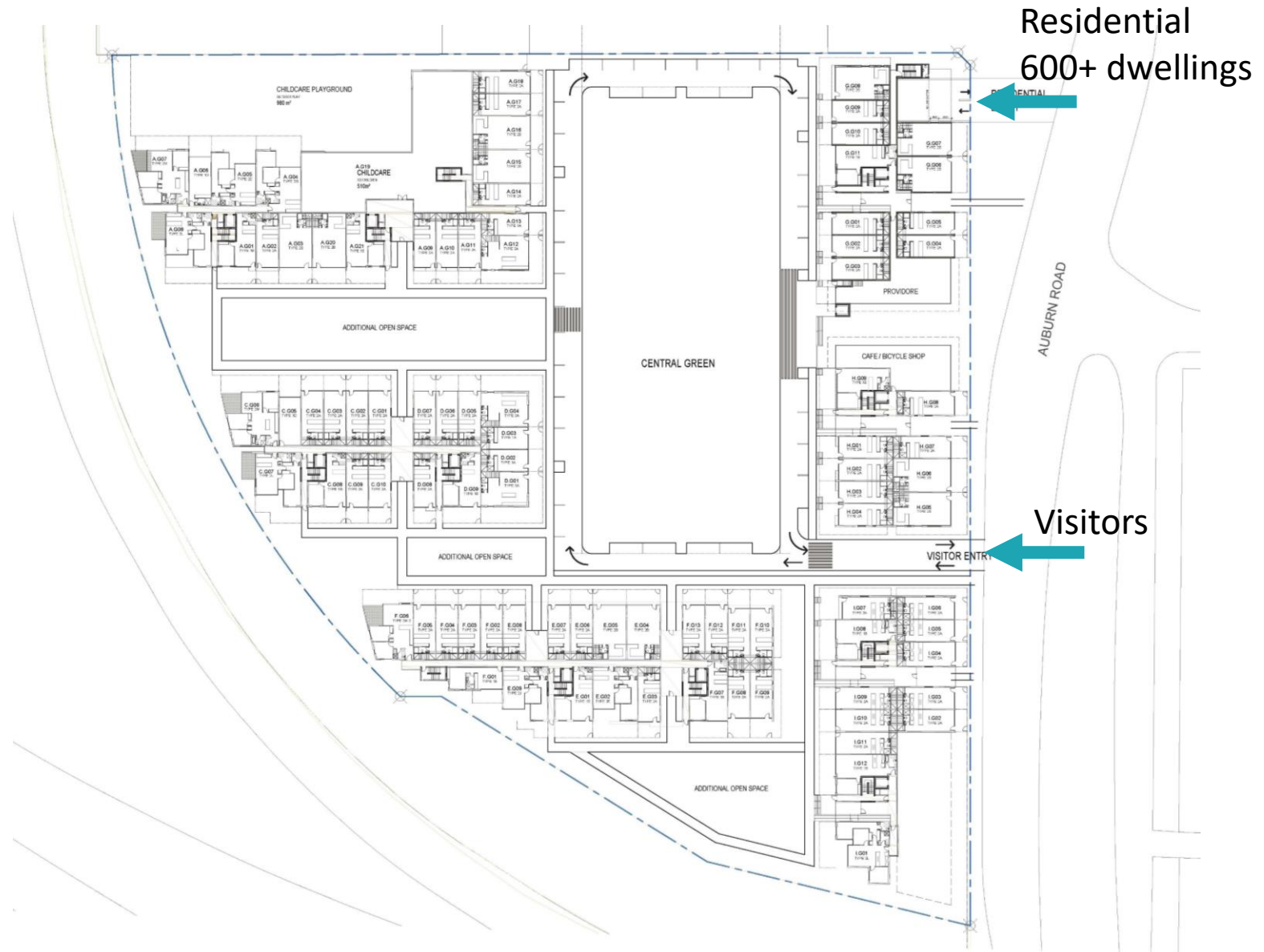
- Generally buildings longer than 60m length as its difficult to:
 - Cross ventilate (long corridors, single sided units)
 - Solar access
- Buildings A-B and E-F exceed 60m in length (75-80m long)
- Conflict between acoustics and cross ventilation outcomes adjacent to the rail line to achieve ADG requirement will be difficult with existing design.
- Excessive footprint site coverage and building length exacerbates solar access issues, natural ventilation and visual bulk.



Schemes	Building Footprint Site Coverage
McGregor Coxall	32%
Proponent's	38%

Access and address

- Limited access of Auburn Road
- Limits the ability to stitch into the local neighbourhood and create a new 'block' pattern to support future development.
- Lack of clear address – especially to the Western Buildings.



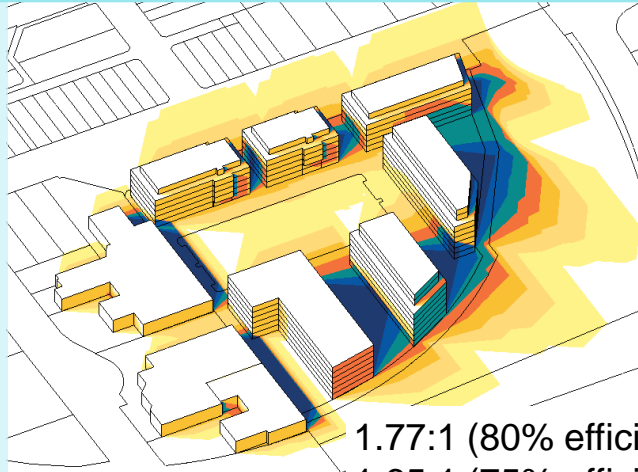
Maximum FSR

McGregor Coxall

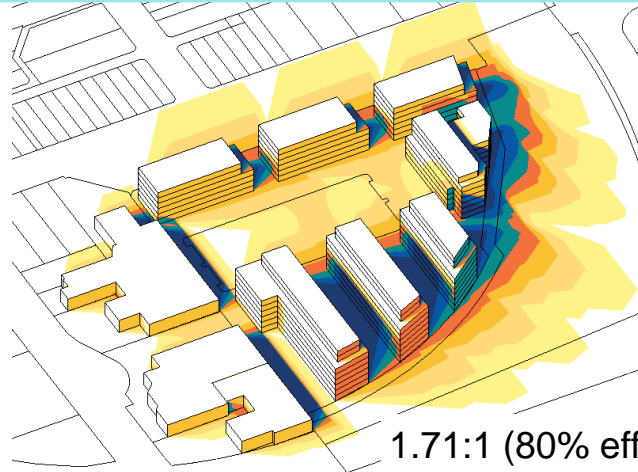
Smith & Tzannes

Architectus

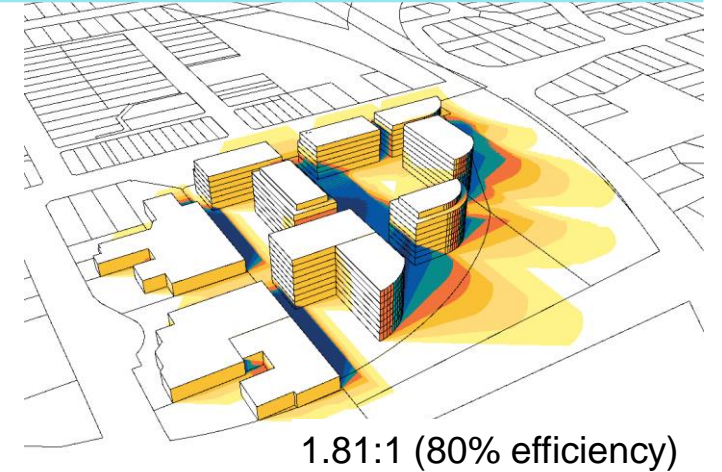
6-8 Storeys



1.77:1 (80% efficiency)
1.65:1 (75% efficiency)

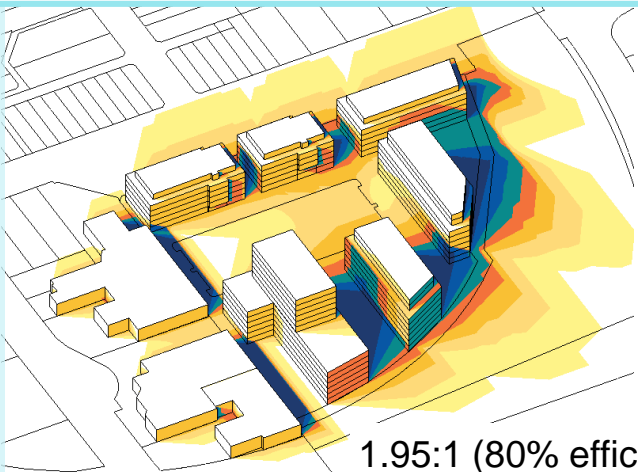


1.71:1 (80% efficiency)
1.60:1 (75% efficiency)

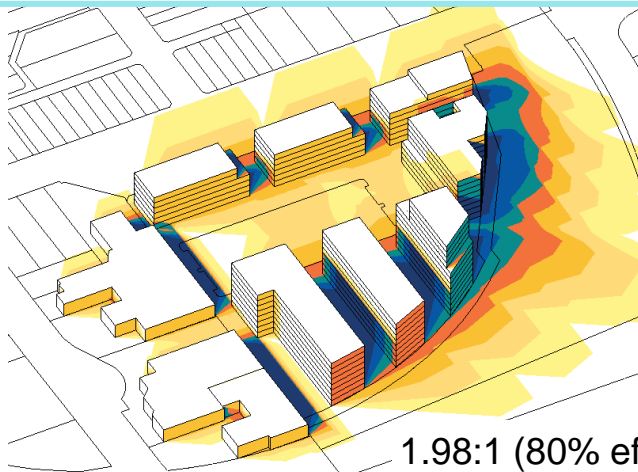


1.81:1 (80% efficiency)
1.69:1 (75% efficiency)

6-12 Storeys



1.95:1 (80% efficiency)
1.82:1 (75% efficiency)



1.98:1 (80% efficiency)
1.86:1 (75% efficiency)

In Summary

- Architectus has demonstrated with each review that an ADG compliant, high quality design with residential amenity **cannot be achieved** under the proposed density; and that a maximum FSR of 1.75:1 and maximum building heights of 22m (6 storeys) and 28m (8 storeys) should apply.
- While some clarifications relating to ADG compliance and building envelope separation has been provided by the Proponent, there remains a number of outstanding ADG and urban design issues particularly related to building setbacks from boundaries, and solar access compliance.

Wrap Up

Recommendation

Floor Space Ratio (FSR)

- **Support 1.75:1** proposed by Council provides:
 - Appropriate setbacks,
 - 6 – 8 storey built form,
 - Strategically appropriate within the hierarchy of centres

Height of Buildings (HOB)

- **Support heights of 22 and 28 metres** proposed by Council when considering Clause 5.6 of *BLEP 2015* allowing rooftop terraces, lift-overs and such above the approved building control
- Clause 4.6 variations will NOT be required.
- The heights proposed by applicant and DPIE would not suitably control delivery of the intended built form.

Floor Space Ratio (FSR)		
Proponent Request	Council Response	Department Recommendation
2.4:1	1.75:1 (6-8 storeys only)	2:1 (no change)
Building Heights		
Proponent Request	Council Response	Department Recommendation
6 storeys – 23m	6 storeys – 22m	6 storeys - 23m (+4m)
8 storeys – 29m	8 storeys – 28m	8 storeys - 29m (+4m)
12 storeys – 47m	NIL. If applied, 12 storeys – 41m	12 storeys - 41m

Contributing Factors

- Key opportunity site – no other major developments likely on Canterbury Bankstown's portion of Regents Park
- The proponent has not demonstrated any significant public benefit for the proposed increase
- The proposal has had multiple reviews conducted by various experts:
 - **2016** – Pre-gateway Review (decision)
 - **2017** – Independent Hearing and Assessment Panel (IHAP)
 - **2019** – DPIE Review of Gateway
 - **2020** – Gateway Review
- The proponent has not demonstrated a proposal that could reasonably achieve the FSR sought (to close to 2.4:1) without severely compromising the amenity of the site.

Any Questions?